



**June 14, 2023**

**Second Draft Spend Plan for funds appropriated to address the 2018 Copper River Chinook and sockeye salmon and the 2020 Copper River and Prince William Sound (PWS) Chinook, sockeye, and chum salmon disaster determination.** NOAA Fisheries allocated \$34,326,265 for these salmon fishery disasters on May 6, 2022. The scope of this fishery disaster includes fisheries for Chinook, sockeye, and chum salmon. A subsequent request for a fishery disaster determination for the 2020 Prince William Sound pink and coho salmon fishery was approved by the Secretary of Commerce on December 16, 2022. A separate spend plan will be developed for the pink and coho salmon fishery disaster.

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

ADF&G, Attn: Karla Bush  
PO Box 115526  
Juneau, AK 99811-5526

**Comments must be sent by June 21, 2023,** for consideration in the final iteration of the spend plan.

**Process to develop the spend plan:** ADF&G posted an initial draft spend plan for public comment in May 2023 and received about 49 written comments on the initial plan (Appendix 1). ADF&G revised the plan based on those comments and is requesting public comment on this second draft spend plan before the plan is finalized and submitted to Pacific States Marine Fisheries Commission (PSMFC).

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

#### Commercial Harvesters

- ADF&G received comments in support of an equal share distribution and comments in support of a tiered payment approach. ADF&G is proposing a hybrid approach where permit holders who meet the eligibility criteria would receive a minimum 'base' payment and an additional 'tiered' payment would be added for those permit holders who have historically participated in the fishery. Tiered payments are proposed based on each permit holder's average gross revenue value for the five years prior to the disaster year. Gross revenue estimates are calculated post-season and informed by the Commercial Fishery Operator Report (COAR) data.
- The Copper River/Prince William Sound Marketing Association is funded by an annual tax on the setnet and drift gillnet fisheries and was impacted by the 2018 and 2020 CR/PWS disasters. ADF&G is proposing a direct payment to the marketing association based on 1% of the 2018 CR drift and 2020 setnet and drift gillnet funds.

- ADF&G is proposing to reduce the proportion of drift gillnet funds for crew members from 10% to 5% based on public comments that not all drift gillnet vessels employ an extra crew member.

Processors

- Tender vessels have been allocated 4% of the processor pool funds.
- ADF&G proposes to use COAR buying data instead of COAR production data to determine eligibility for processing companies. The 2018 portion of this fishery disaster is specific to the Copper River, Districts 200 and 212, and COAR production data is based on where processing occurred and not a specific management area where fish were harvested. The value information in COAR buying data is the exvessel price paid to harvesters as opposed to wholesale value from COAR production data.
- ADF&G proposes to include a 25% cap on the pro rata disbursement of total allocation to processors to be responsive to public comments requesting consideration of fishery disaster impacts on smaller processing companies that have a higher dependence on the CR/PWS salmon fisheries.

Research

- The allocation to research was reduced to 11% as a compromise based on public comment recommending a reduction from 12% to 10%.

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

1) assist fishery participants harmed by the 2018 and 2020 salmon fishery disasters and 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

**The proposed categories and allocations reflect consideration of comments received from stakeholder input.**

Category	Allocation	Estimated funds <sup>a</sup>
Research	11%	\$3,768,000
Communities	3%	\$1,027,000
Harvesters	57%	\$19,527,000
Processors	29%	\$9,934,000
Program support	<0.2%	\$68,000
<b>Total</b>		<b>\$34,324,000</b>

<sup>a</sup> Additional funds will be allocated to Pacific States Marine Fisheries Commission (PSMFC) to administer the federal grant

**Research:** Funds are proposed to be allocated to support projects intended to improve available fishery information and help prevent and/or mitigate future fishery disasters. The scope of this fishery disaster includes Copper River Chinook and sockeye salmon and Prince William Sound Chinook, sockeye, and chum salmon. Recent Alaska disaster spend plans have used competitive and non-competitive bid processes to award research funds. If a non-competitive award process is used, research projects that are responsive to the research themes would be described directly in the spend plan.

The following research themes were suggested by stakeholders and ADF&G research and management staff as priorities for funding. Potential ADF&G projects that could be funded under each research theme in the final spend plan are also described.

- Research that improves understanding of the relative importance of specific mechanisms that drive productivity of Alaska salmon, which could include:
  - how climate-driven conditions in freshwater/ocean environments impact future runs;
  - freshwater and early marine survival bottlenecks, habitat use, and movement patterns;
  - the role of diet, health, and disease on the survival of juveniles and spawning success of adult salmon.

Potential projects:

1. Environmental monitoring of Klutina Lake and the Gulkana River drainage, including temperature monitoring and year-round zooplankton sampling.

- Research to inform non-adult abundance estimates that can be used in developing or improving forecasting tools.

Potential projects:

1. Smolt enumeration of Klutina River to inform spawner/recruitment dataset.
2. Smolt weirs or other monitoring projects on Gulkana River mainstem and West Fork.

- Improved methods and information for estimating adult salmon harvest and abundance.

Potential projects:

1. Genetic stock identification (GSI) based run reconstruction for Copper River Sockeye salmon from scale sample archives.
2. Estimate travel time of sockeye salmon from the commercial fishery district to Miles Lake and upstream to Fish Wheels and Chitna to develop an indicator of inriver salmon.
3. GSI analysis of samples collected from Copper River Chinook salmon harvested in commercial gillnet, personal use, and subsistence fishery.
4. Expand the genetic baseline for Copper River sockeye and Chinook salmon populations.
5. Continue genetic sampling of sockeye salmon commercial harvest.

ADF&G received public comment recommending research to study hatchery/wild interactions but is not including it in this spend plan as these studies are currently underway. Both hatchery and wild salmon stocks were similarly impacted by the fishery disaster.

**Communities (~\$1,027,000):** Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. Fishery disaster funds allocated to communities impacted by the fishery disaster can only be used for managing, repairing, or maintaining approved infrastructure, services, or habitat that support salmon fisheries in the affected areas. Only communities that have a demonstrated loss of salmon landings due to the fishery disaster are proposed to be eligible for community funds. Fishery disaster funds are Federal funds and cannot be used for projects where matching funds are required and this includes state or local match requirements.

Experience with recent fishery disasters has shown that not all communities eligible for fishery disaster funds are able to participate in the process because the community entity must have capacity to administer the receipt of funds through a federal grant subaward process and the funds may only be used for approved projects directly related to the fisheries in the disaster determination. To accommodate the

variety of needs and administrative capacities of communities eligible for disaster funds, ADF&G proposes to include a spend plan provision allowing eligible communities to opt-out of receiving disaster funding for the 2018 Copper River Chinook and sockeye salmon and 2020 Copper River and PWS Chinook, sockeye, and chum salmon disasters. Allocations to communities that opt-out will be added to the final allocations for participating communities. This will help ensure that community-designated funds are fully utilized and made available to communities that decide to participate in the disaster funding process.

Proposed eligibility criteria for communities:

1. Fish ticket port of landing data must show that Chinook and/or sockeye salmon from the Copper River drift gillnet were landed in the community in 2018 and/or that Chinook, sockeye, and/or chum salmon from Prince William Sound were landed in the community in 2020.
2. Estimated loss in gross revenue value for those salmon species landed in the community in 2018 and 2020 combined must be at least \$150,000 as compared to the respective previous five-year average (2013-2017 and 2015-2019).

Based on the proposed criteria, the following communities may be eligible for community-designated funds: Cordova, Whittier, Valdez, Seward, and Kenai.

**Harvesters (~\$19,527,000):** This category includes permit holders, vessel crew, and the Copper River Prince William Sound Marketing Association. ADF&G proposes direct payments to commercial fishery permit holders and vessel crew who meet all eligibility criteria. Commercial Fisheries Entry Commission (CFEC) permit information and fish ticket data from commercial salmon landings will be used to determine eligibility and payment for permit holders. Eligibility for vessel crew will be verified using ADF&G commercial crew license or CFEC permit data and an affidavit from the permit holder or vessel owner.

**Processors (~\$9,592,000):** ADF&G proposes direct payments to companies that own processing facilities and tender vessel owners that meet all eligibility criteria. ADF&G proposes to allocate 4% of the processor share to tender vessels and 96% to eligible processing companies. Commercial Operators Annual Report (COAR) buying data will be used to determine eligibility and payment for processors. Tender vessel eligibility is proposed to be determined based on vessel contracts and verified using ADF&G fish ticket information.

**Program Support (\$68,000):** ADF&G is proposing to designate funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

## Commercial Harvester Funds

ADF&G proposes to allocate harvester funds proportional to the estimated loss in gross revenue for the 2018 Copper River District Chinook and sockeye salmon drift gillnet fishery and the 2020 Prince William Sound (Area E) Chinook, sockeye, and chum salmon fishery which includes drift gillnet, set gillnet, and purse seine gear sectors. The estimated loss in gross revenue is calculated by subtracting the value of the fishery in the disaster year from the previous five-year average value (2013-2017 and 2015-2019). ADF&G is proposing to include a direct payment to the Copper River Prince William Sound Marketing Association equal to 1% of the total estimated gross revenue loss for the drift gillnet and set gillnet sector.

Fishery	Gross revenue disaster loss	Proportion of total loss	Funds based on loss	1% to marketing association	Final funds
2018 Copper River drift	\$19,702,388	39%	\$7,703,960	\$77,040	\$7,626,921
2020 CR/PWS drift gillnet	\$26,320,103	53%	\$10,291,596	\$102,916	\$10,188,680
2020 PWS set gillnet	\$1,114,346	2%	\$435,728	\$4,357	\$431,370
2020 PWS seine	\$2,802,224	6%	\$1,095,716	n/a	\$1,095,716
Total	\$49,939,061		\$19,527,000	\$184,313	\$19,342,687

### 2018 Copper River drift gillnet ~\$7,626,921

The allocation is proposed to be divided into two pools, one for S03E permit holders (95%) and one for vessel crew members (5%). The proposed split between permit holders and crew members is based on half of the vessels employing up to one crew member who earns a 10% share.

2018 S03E Permit Holders. Proposed eligibility criterion for 2018 Copper River permit holders:

- S03E permit holder must have made a Chinook or sockeye salmon landing in 2018 in District 200 or 212, Copper River.

Funds are proposed to be paid to the person listed as the 2018 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2018 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2018 and permanently transferred a permit away in 2018 will not receive payments.

**ADF&G is proposing that each permit holder who meets all eligibility criteria will receive a minimum ‘base’ payment of \$10,000.** If multiple eligible permit holders made landings in 2018 on the same limited entry permit, the base payment will be split pro rata to the value of each eligible permit holders’ Chinook and/or sockeye salmon landings in 2018. A total of 482 permit holders made landings on 477 S03E permits in 2018.

Additional ‘tier’ payments are proposed to be added to the base payment as described below for permit holders who also made Chinook and/or sockeye salmon landings during the five year period from 2013 to 2017 in District 200 or 212. Four tiers are proposed based on each permit holder’s 5-year average CFEC estimated gross revenue for Chinook and/or sockeye salmon. After accounting for minimum payments, the remaining funds are proposed to be allocated to four tiers and eligible permit holders in the same tier would receive an equal share of the tier allocation. ADF&G did not use the CFEC quartiles, as suggested in public comment because those are based on all salmon species and this fishery disaster does not include pink or coho salmon. An estimated 456 permit holders may be eligible for an additional tier payment.

Tier Level	2013-2017 average CFEC gross revenue value of Copper River Chinook and Sockeye salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$74,000	25%	56
2	\$53,000 - \$73,999	25%	83
3	\$38,000 - \$52,999	25%	104
4	≤ \$37,999	25%	213

2018 drift gillnet vessel crew. Copper River drift gillnet vessel crew must meet the following proposed criteria to be eligible for an **equal payment** of the 2018 gillnet vessel crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed Copper River drift gillnet crew eligibility criteria:

1. Crew member must have held a 2018 commercial crew license or a 2018 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2018 commercial Copper River drift gillnet salmon fishery for a qualified S03E permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member may not be eligible for fishery disaster funds as an S03E permit holder in 2018.

### 2020 Prince William Sound drift gillnet ~\$10,188,680

The allocation is proposed to be divided into two pools, one for S03E permit holders (95%) and one for vessel crew members (5%). The proposed split between permit holders and crew members is based on half of the vessels employing up to one crew member who earns a 10% share.

S03E Permit Holders. Proposed eligibility criterion for 2020 drift gillnet permit holders:

- S03E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound, Area E.

Funds are proposed to be paid to the person listed as the 2020 'Permit holder' and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.

**ADF&G is proposing that each permit holder who meets all eligibility criteria receive a minimum 'base' payment of \$10,000.** If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is proposed to be split pro rata to the value of each eligible permit holders' Chinook, sockeye, and/or chum salmon landings in 2020. A total of 491 permit holders made landings on 487 S03E permits in 2020.

Additional 'tier' payments are proposed to be added to the base payment as described below for permit holders who also made Chinook, sockeye, and/or chum salmon landings during the five year period from 2015 to 2019 in PWS. Four tiers are proposed based on each permit holder's 5-year average CFEC estimated gross revenue for Chinook, sockeye, and/or chum salmon. After accounting for minimum payments, the remaining funds are proposed to be allocated to four tiers and eligible permit holders in the same tier would receive an equal share of the tier allocation. ADF&G did not use the CFEC quartiles, as suggested in public comment because those are based on all salmon species and this fishery disaster does not include pink or coho salmon. An estimated 457 permit holders may be eligible for an additional tier payment.

Tier Level	2015-2019 average CFEC gross revenue value of PWS Chinook, Sockeye, and Chum salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$108,000	25%	57
2	\$83,000 - \$107,999	25%	86
3	\$60,000 - \$82,999	25%	119
4	≤ \$59,999	25%	195

2020 drift gillnet vessel crew. Prince William Sound drift gillnet vessel crew must meet the following proposed criteria to be eligible for an **equal payment** of the 2020 drift gillnet crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed Prince William Sound drift gillnet crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial drift gillnet salmon fishery for a qualified S03E permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member may not be eligible for fishery disaster funds as an S03E permit holder in 2020.

### 2020 Prince William Sound set gillnet ~\$431,370

The allocation is proposed to be divided into two pools, one for S04E permit holders (85%) and one for setnet crew members (15%). The split between permit holders and crew members is based on an average crew size of one to two people, each earning a 10% crew share.

2020 S04E Permit Holders. Proposed eligibility criterion for 2020 set gillnet permit holders:

- S04E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound, Area E.

Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.

**ADF&G is proposing that each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$10,000.** If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment is proposed to be split pro rata to the value of each eligible permit holders’ Chinook, sockeye, and/or chum salmon landings in 2020. A total of 26 permit holders made landings on 26 S04E permits in 2020.

Additional ‘tier’ payments are proposed to be added to the base payment as described below for permit holders who also made Chinook, sockeye, and/or chum salmon landings during the five year period from 2015 to 2019 in PWS. Four tiers are proposed based on each permit holder’s 5-year average CFEC

estimated gross revenue for Chinook, sockeye, and/or chum salmon. After accounting for minimum payments, the remaining funds are proposed to be allocated to four tiers and eligible permit holders in the same tier would receive an equal share of the tier allocation. ADF&G did not use the CFEC quartiles, as suggested in public comments because those are based on all salmon species and this fishery disaster does not include pink or coho salmon. An estimated 23 permit holders may be eligible for an additional tier payment.

Tier Level	2015-2019 average CFEC gross revenue value of PWS Chinook, Sockeye, and Chum salmon landings	Tier Allocation	Est. number of eligible permit holders
1	≥ \$100,000	35%	5
2	\$75,000 - \$99,999	25%	5
3	\$50,000 - \$74,999	25%	7
4	≤ \$49,999	15%	6

2020 set gillnet crew. Set gillnet crew must meet the following proposed criteria to be eligible for an **equal payment** of the 2020 set gillnet crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed Prince William Sound set gillnet crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial set gillnet salmon fishery for a qualified S04E permit holder, based on an affidavit from the permit holder.
3. Crew member may not be eligible for fishery disaster funds as an S04E permit holder in 2020.

### 2020 Prince William Sound seine ~\$1,095,716

The allocation is proposed to be divided into two pools, one for S01E permit holders (80%) and one for vessel crew members (20%). The split between permit holders and crew members is based on average crew size and crew shares and considers the higher initial costs borne by seine vessel operators that are typically reimbursed through standard deductions to crew pay.

2020 S01E Permit Holders. Proposed eligibility criterion for 2020 seine permit holders:

- S01E permit must have been used to make Chinook, sockeye, or chum salmon landings in 2020 in Prince William Sound.

Funds are proposed to be paid to the person listed as the 2020 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2020 and certified they were unable to participate to qualify for an emergency transfer and permit holders who did not make any landings in 2020 and permanently transferred a permit away in 2020 will not receive payments.



**ADF&G is proposing that each permit holder who meets all eligibility criteria receive a minimum ‘base’ payment of \$1,000.** If multiple eligible permit holders made landings in 2020 on the same limited entry permit, the base payment are proposed to be split pro rata to the value of each eligible permit holders’ Chinook, sockeye, and/or chum salmon landings in 2020. A total of 223 permit holders made landings on 218 S01E permits in 2020.

Additional ‘tier’ payments are proposed to be added to the base payment as described below for permit holders who also made Chinook, sockeye, and/or chum salmon landings during the five year period from 2015 to 2019 in PWS. Four tiers are proposed based on each permit holder’s 5-year average CFEC estimated gross revenue for Chinook, sockeye, and/or chum salmon. After accounting for minimum payments, the remaining fund are proposed to be allocated to four tiers and eligible permit holders in the same tier would receive an equal share of the tier allocation. ADF&G did not use the CFEC quartiles, as suggested in public comment because those are based on all salmon species and this fishery disaster does not include pink or coho salmon. An estimated 203 permit holders may be eligible for an additional tier payment.

<b>Tier Level</b>	<b>2015-2019 average CFEC gross revenue value of PWS Chinook, Sockeye, and Chum salmon landings</b>	<b>Tier Allocation</b>	<b>Est. number of eligible permit holders</b>
1	≥ \$100,000	25%	12
2	\$50,000 - \$99,999	25%	23
3	\$20,000 - \$49,999	25%	62
4	≤ \$19,999	25%	106

2020 seine vessel crew. Prince William Sound seine crew must meet the following proposed criteria to be eligible for an **equal payment** of the 2020 seine vessel crew funds. Direct payments to minors are not authorized by the terms of the Federal grant but may be authorized to guardians in the same household on behalf of an eligible minor.

Proposed Prince William Sound seine crew eligibility criteria:

1. Crew member must have held a 2020 commercial crew license or a 2020 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database.
2. Crew member must provide information to show they participated as fishing crew in the 2020 commercial seine salmon fishery for a qualified S01E permit holder, based on an affidavit from the permit holder or vessel owner.
3. Crew member may not be eligible for fishery disaster funds as an S01E permit holder in 2020.

## 2018 Copper River and 2020 Prince William Sound Processors (~\$9,934,000)

Processing companies (96% of the processor pool):

Salmon processing companies that meet all proposed criteria would be eligible for payment based on the estimated loss in exvessel value using COAR buying data for 2018 Copper River District Chinook and sockeye salmon and 2020 Prince William Sound (Area E) Chinook, sockeye, and chum salmon, including salmon harvested under hatchery cost recovery permits. The estimated

loss is calculated by subtracting the exvessel value in the disaster year (2018 and 2020) from the respective previous five-year average (2013-2017 and 2015-2019).

Processing company eligibility criteria:

1. Processing company must own a facility that processed Copper River Chinook or sockeye salmon in 2018 and/or Prince William Sound Chinook, sockeye, or chum salmon in 2020.
2. Processing company must have a demonstrated loss in exvessel value greater than \$10,000 combined for 2018 Copper River Chinook and sockeye salmon and 2020 Prince William Sound Chinook, sockeye, and chum salmon.

Disaster payments to processing companies are proposed to be **pro rata** to each company's demonstrated loss relative to the total loss of all eligible processing companies, up to a maximum of 25% of the total allocation to processors.

Tender Vessels (4% of the processor pool):

Eligibility criterion for tender vessels:

- Vessel must have operated as a tender in the 2018 Copper River Chinook and sockeye salmon and/or 2020 Prince William Sound Chinook, sockeye, and chum salmon fishery as demonstrated by a contract with a processor for salmon tender services. ADF&G fish ticket data will be used to verify that the vessel was used to tender Chinook, sockeye, and/or chum salmon.

Tender vessel owners that meet the eligibility criterion are proposed to receive one share of the tender vessel allocation for each qualifying year, for a maximum of two shares. Equal share amounts will be determined based on eligible applications received for tender vessel payment. Total allocation divided by the eligible applicants and years of eligibility will be one share.

ADF&G is seeking public comment on criteria for tender vessel eligibility and distribution of funds to tender vessels.

## Appendix 1. Public comment on initial draft of the spend plan.



18 May 2023

Attn: Karla Bush  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811-5526  
[dfg.com.fisheriesdisasters@alaska.gov](mailto:dfg.com.fisheriesdisasters@alaska.gov)

Dear Ms. Bush:

OBI Seafoods supports the proposed spend plan for the funds allocated to address the 2018 Copper River Chinook and sockeye salmon and the 2020 Copper River and Prince William Sound (PWS) Chinook, sockeye, and chum salmon fishery disasters. The allocation of \$34,326,265 reflects the seriousness of the disasters and the need to provide assistance to the affected fishery participants.

OBI Seafoods has been actively engaged in processing salmon in Prince William Sound region since 1985, establishing a long-standing presence in the region. Over the years, this processing operation has had numerous positive impacts on both our company and the surrounding community. Our operation create job opportunities, offering employment to a considerable number of individuals directly involved in the processing facilities. These jobs provide stable income and support local families, fostering economic stability and growth in the area. Moreover, the processing of salmon brings about a multiplier effect on the local economy. It stimulates ancillary industries, such as packaging, transportation, and logistics, creating additional employment and business opportunities. This ripple effect generates a positive economic cycle, benefitting the entire community by enhancing revenue streams, tax contributions, and overall prosperity.

Overall, OBI supports the Draft Spend Plan, and would like to specifically address the proposed allocations to the research, harvesters, processors, and inclusion of hatchery cost recovery for both harvesters and processors. These allocations seem reasonable and align with the guiding principles for the distribution of disaster funds, which aim to assist the affected participants and improve fishery information for future management approaches.

### **Research**

Regarding the research category, the suggested research themes are relevant and crucial for improving our understanding of the salmon fishery and its future performance. OBI appreciates the inclusion of topics such as the impact of ocean/climate conditions on future runs, freshwater and early marine survival bottlenecks, and the role of diet, health, and disease on salmon survival and spawning success. These research priorities will contribute to better forecasting tools and management approaches.

### **Harvesters**

The proposed allocations for the harvesters and processors categories, based on estimated loss in gross revenue, are reasonable and will provide direct support to the affected individuals and businesses. The use of commercial fishery data and permit information for eligibility and payment determination is a fair approach.

### **Processors**

The proposed allocation for processors, which currently stands at 28%, should adequately account for the challenges processors face in recovering from these disasters. However, we believe tenders should be included in the calculation for processors. OBI Tenders were paid their full contract regardless of the amount of fish they purchased on the grounds.

Processors play a critical role in adding value to the salmon catch and facilitating its entry into various markets, contributing significantly to the overall economic viability of the fishery. By allocating a portion of the funds to support processors, we can ensure the long-term stability and resilience of the processing sector.

### **Hatchery Cost Recovery**

In addition to the proposed allocations, we humbly suggest the inclusion of supporting hatchery cost recovery in not only the harvester category but also the processor category. As mentioned in the Draft Spend Plan, the cost recovery goals for PWS sockeye and chum salmon were not met in 2020. OBI Seafoods, along with two other processors were awarded the hatchery cost recovery bid in 2020, and we invested a significant amount of funding upfront to cover the processing of hatchery cost recovery salmon. These costs, which encompass various aspects such as facility maintenance, staff salaries, equipment, and fish production, significantly impact both harvesters and processors. By incorporating hatchery cost recovery into the equation, we can ensure a fair and balanced approach that reflects the true expenses incurred throughout the entire value chain.

In conclusion, we express our appreciation for the dedicated efforts made in developing the spend plan and addressing the salmon disasters. We also commend the inclusion of public comment solicitation, and we are grateful for the opportunity to contribute our input. We support the proposed spend plan and believe that incorporating hatchery cost recovery in both the harvester and processor categories will further strengthen the plan's effectiveness. We look forward to the release of the second draft of the spend plan and the finalization of a comprehensive plan that addresses the needs of all stakeholders affected by these fishery disasters.

Sincerely,

Mark Palmer  
President

Brian O'Leary  
VP Alaska Kodiak/PWS Operations

**From:** Alex K  
**Sent:** Tuesday, May 16, 2023 11:22 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Fisheries Disaster Relief Response

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. It should be based off a 5-year average. Fishermen are independent businesses, and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a person's hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore, they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionately high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

**From:** Kuzmin Alexander  
**Sent:** Tuesday, May 16, 2023 10:56 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster response

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. It should be based off a 5-year average. Fishermen are independent businesses, and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a person's hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore, they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionately high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

I am writing to provide comment on the draft spend plan for funds appropriated to address the 2018 Copper River Chinook and sockeye salmon and 2020 Copper River and PWS Chinook, sockeye and chum salmon disaster determination.

The draft spend plan attempts to strike a fair and equitable division of disaster relief to multiple affected parties throughout the seafood industry into the communities which have a stake in the success and failures of the Area E commercial salmon fishery.

The current draft excludes meaningful relief, if any to processor facilities that count 2018 as a first year of operations. That group is most likely small, maybe even just one, but is also a recipient of the negative financial impacts from these return failures.

Under this proposed model a newer facility cannot compete with the years of production possible in the 2013-2017 and 2015-2019 look back years. Basing the distribution of relief support at a pro-rata share of demonstrated lost production value relative to total lost value of all eligible facilities produces a disproportionately low allocation to a facility in which the actual 3 years of operation include 2 disaster years.

I am advocating for utilizing a metric that recognizes losses incurred by these outlier facilities as well as the lost opportunity to compete with the production possibility available during the look back periods. These prior history periods include some of the highest Copper River production in history of the fishery.

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

Alexis Cooper

**From:** Ketch Em  
**Sent:** Friday, May 12, 2023 8:38 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Fwd: Disaster money

Hello

My name is Andrew Eckley

10 year Area E fisherman in support of Darin Gilmans proposal

Thank you

----- Forwarded message -----

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.

The majority of fishery disasters have been based off quartiles to date, it should remain that way.

**From:** Anica Estes  
**Sent:** Tuesday, May 9, 2023 10:11 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Draft spend plan

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

Hello,

I am a fisherman in PWS and Copper River; I agree with the equal split of disaster funds.

I've been fishing for over 30 years and I've had amazing years and I've had years where the many variables involved with fishing are out of my control, causing my year end catch numbers to be low.

When a fisherman has a costly breakdown, crew problems, or any other unforeseen issues that prevent a boat from fishing, that takes them off the high-liner list at no fault of his own.

These disastrous factors can often cost a fisherman their season; a high liner fisherman should not receive more disaster funds than a fisherman who's had a bad season.

Please keep the equal split of the disaster funds amongst qualified applicants. Thank you.

Steve Estes

Sent from my iPhone

**From:** Ben V  
**Sent:** Tuesday, May 16, 2023 5:14 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)

My name is Ben Van Dyck and I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. It should be based of a 5 year average. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionally high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

Thank you  
Ben Van Dyck

**From:** brent davis  
**Sent:** Tuesday, May 9, 2023 9:34 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Comments 2018, 2020 Copper River/PWS Spend Plan

Karla Bush,

Thank you for your consideration. I am a longterm participant in the Area E Driftnet fishery (25 + years). I leased a permit for the entire 2020 season and according to the spend plan would be a "Tansferee?" I took the risk. My understanding of the spend plan is that I would be part of the disaster relief. I want to say I appreciate the inclusion. Thank you.

In 2018 I leased two separate permits, each for only part of the season. I realize that I am an anomaly in this category. According to my reading of the spend plan, I would receive relief based on my deliveries relative to the other permit holders on those permits for that year. Again, I would like to say thank you for allowing for this situation in the spend plan.

I plan to continue to participate in this fishery, add to the local economy, and live in Cordova. This relief can make a big difference to a individual business/fisherman like myself.

Sincerely,  
Brent Davis



**From:** Bill Markowitz  
**Sent:** Wednesday, May 10, 2023 5:33 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster relief funds 2018 & 2020

Greetings,

I am sending this email in regards to the recent disaster relief funds appropriated by Congress for the 2018 and 2020 Copper River and Prince William Sound salmon fisheries.

I feel that as a Copper River/PWS Salmon permit holder the only "Fair and Just" way to distribute these funds would be an equal division of funds amongst permit holders in the affected fisheries.

If the division of funds were to be based on catch history this would not be fair *UNLESS* the funds were to be distributed in such a way that a permit holders with the smallest catch records for the qualifying seasons would receive a higher percentage of funds.

An example of this would be:

- Gillnetter A catches \$200k of fish
- Gillnetter B only catches \$30k worth of fish

Why would it be fair for Gillnetter A to receive more funds when due to his gross stock he *did not* have a disaster as compared Gillnetter B?

Gillnetter B is the permit holder who truly had a disaster due to his low gross stock.

From these examples it can be demonstrated that distribution of funds based on catch history is *NOT* a fair method of distribution.

The only way to fairly distribute the funds would be an equal distribution amongst permit holders.

Thank you for your consideration,

William J Markowitz  
Area E gillnetter

**From:** Brandon M  
**Sent:** Thursday, May 11, 2023 5:13 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Pws and Copper River disaster

I am against the equal share for the 2018 Drift Gillnet Disaster, I am also against the equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more than others. The quartiles reflect a persons hard work and time commitment to the fishery. Fishermen should be compensated based on how hard they work, not just because they are a permit holder in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.  
The majority of fishery disasters have been based off quartiles to date, it should remain that way.

Thank you.

Brandon Maxwell  
F/V Squaw Bay, F/V Keta

**From:** Chelsea H  
**Sent:** Friday, May 19, 2023 4:06 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Draft Spend Plan Comments: 2018 and 2020 Copper River Fishery Disaster

Dear Ms. Bush, and whomever else this may concern,

I am a vessel owner and stakeholder in the Copper River and Prince William Sound fisheries. These are my personal comments as a fishery participant and not comments made on behalf of any organization to which I belong, serve of the board, or any organization in which I have previously worked for.

After reviewing the initial spend plan, there are a few points I would like to comment on:

I encourage the final spend plan to utilize a tiered system based on catch history to determine amounts, rather than an equal split amongst all permit holders. As an example, catch history could be compared to the CFEC quartile tables to determine the tiers in which permit holders fall — that said, no permit holders should be left high and dry and there should be a minimum amount that all permit holders qualify for, even if they are a new entrant into the fishery.

My reasoning for this suggestion is that there are fishermen who typically fish consistently from May through September, and some that only fish several weeks each year, and there is a great deal of variability and diversity between the two. Dividing the relief funding via tiers or utilizing the quartiles to determine relief amounts would help to compensate fishermen more comparably to their own catch history, while ensuring those that fall as outliers on the bottom are still provided some relief.

I also would like to comment on the crew percentage — most vessels in the Copper River/Prince William Sound gillnet fleet do not have a deckhand, though there is a small proportion of the fleet that does operate with one. 10% of the participant funding allocated to crew seems unreasonably high for the number of boats that have full-time, full-season crew. Additionally, crew license holders, like myself and many other spouses of permit holders, may pop on to vessels for some openers but not all openers. Many crew do not complete a whole season with the same boat, or even the same fishery. That said, some vessels do have consistent crew year after year. Some vessels have 2 or 3 crew that each spend a short amount of time on the vessel, but are not there all together. These nuances will likely complicate the distribution for crew, and I encourage the final spend plan to keep the qualification for needing an affidavit from the permit holder, as the crew allocation could become very bogged down if 2018 crew license holders from other fisheries or regions attempted to apply for this funding.

Though I don't have specific data to back up my estimate here, I do have experience in this fishery for over 10 years as a vessel owner and have crewed off and on in this fishery since 2004. My best estimate on the number of boats with a crewman, is at most 15-20% of the fleet, but it likely is lower. A suggested formula for the amount for crew, would be to take 10% of 20% (ie, 2%) of the total drift gillnet allocation and allocate that to crew instead of 10%.

Additionally, I would like to see the research allocation to be capped at no more than 10% of the total and for the additional percentage points from that category to be allocated to either the communities or harvesters group. I am supportive of research, particularly that which can inform the future of our fisheries and ideally help to strengthen our fisheries against future disasters. Ultimately, however, disaster relief funding is meant to offset economic impacts to harvesters and provide relief and I would prefer to see harvesters, as the most numerous stakeholder group, to receive a higher allocation.

I would like to see the research projects awarded with a competitive process that also utilizes local fishery stakeholders (ie, fishermen and/or processors) as well as local adfg fishery managers via the project selection panel as I believe that fishery stakeholders, as daily observers in the field, are frequently the most informed about management and research needs and should be considered a significant resource and knowledge base for researchers.

Thank you for your time,

Chelsea Haisman  
F/V Isla Kay

COPPER RIVER  
PRINCE WILLIAM SOUND  
MARKETING ASSOCIATION  
A Regional Seafood Development Association

Copper River Prince William Sound Marketing Association

May 18, 2023

Karla Bush, Federal Fisheries Coordinator  
Alaska Department of Fish and Game  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99802

Ms. Bush,

As stated in our correspondence dated March 30, 2023, Copper River Prince William Sound Marketing Association should be included in the 2018 & 2020 salmon disaster funding spend plan & disbursement. Two Copper River & Prince William Sound salmon harvest gear groups have voted to become tax paying members of the regional seafood development association. At this time, those gear groups are salmon drift gillnet permits (S03E) and salmon set gillnet permits (S04E) in Area E. We understand that disaster declarations have been made impacting these permit holders and thereby CR/PWS MA in 2018 and 2020.

Copper River Prince William Sound Marketing Association, the Regional Seafood Development Association ([AS 44.33.065](#)) for Area E, levies a 1% tax ([AS 43.76.350](#)) on the salmon drift and set gillnet limited entry permit holders in this region. This tax is withheld from fishermen by processors, collected by the State of Alaska Department of Revenue, and passed through the state budget to us directly, in full by the Department of Commerce, Community & Economic Development. This is a voluntary tax passed by a majority vote of the S03E permit holders in 2005 and S04E entry permit holders 2009 according to state statutes. The 1% tax assessment is calculated and listed on each ADFG fish ticket. This 1% assessment on the commercial salmon harvest of those gear groups is the sole source of our funding and therefore, CR/PWS MA believes that we are entitled to, and should be paid, 1% of any fishery disaster relief payments that may be paid to Area E drift gillnet or set gillnet permit holders.

In the DRAFT Spend Plan explanation related to inclusion of Communities states “Municipalities and boroughs rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries” and that “communities that have a demonstrated loss of salmon landings due to the disasters will be eligible”. As explained above, CR/PWS MA has been authorized to tax S03E & S04E permit holders 1% on all deliveries. This tax assessment is our sole source of funding unlike municipalities and boroughs that have additional streams of revenue. Our demonstration of loss is evidenced by the fact that this disaster funding exists at all. If fishermen have been impacted by a disaster then the regional seafood development association is directly impacted as well by default. As an example, the CY20 assessment collected from permit holders was a combined total of \$159,542.86 down from an average of 405K. See table below.

**Regional Seafood Development Association 1% Voluntary Assessment  
RECEIVED FROM STATE OF ALASKA , PAID BY AREA E/PWS DRIFT &  
SET PERMIT HOLDERS**

Year Tax Collected	Year Tax Disbursed	PWS DRIFT permits	PWS SET permits	Expected disbursement
CY 2006	FY 2008	284,719.48		0 284,749.64
CY 2007	FY 2009	355,010.46		0 355,010.46
CY 2008	FY 2010	282,779.27		0 282,779.27
CY 2009	FY 2011	327,476.45	9,193.07	336,669.52
CY 2010	FY 2012	481,627.76	15,460.71	497,088.47
CY 2011	FY 2013	517,334.97	16,386.95	533,721.92
CY 2012	FY 2014	589,415.85	28,343.45	617,759.30
CY 2013	FY 2015	516,043.54	12,630.84	528,674.38
CY 2014	FY 2016	545,334.07	18,754.84	564,088.91
CY 2015	FY 2017	351,308.90	10,450.90	361,759.80
CY 2016	FY 2018	356,300.24	6,108.33	362,408.57
CY 2017	FY 2019	380,570.45	3,222.92	383,793.37
CY 2018	FY 2020	450,301.00	51,255.00	*501,556.00
CY 2019	FY 2021	486,734.93	26,784.67	*513,519.60
CY 2020	FY 2022	150,777.00	8,765.80	159,542.80
CY 2021	FY 2023	261,581.00	10,322.00	271,903.00
CY 2022	FY 2024	300,512.09	20,039.22	320,551.31

\*included previously unreported set net assessed funds

As is demonstrated in the table, 2020 was particularly catastrophic to our organizational budget and operations which required use of limited savings resources in order to continue operations without severe layoffs and program reductions. The impact of continues to reverberate and programs remain curtailed as a result.

Please find attached State of Alaska RSDA statutes and regulations for further clarity on Regional Seafood Development Associations and the taxes that they are authorized to levy.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Christa Hoover  
Executive Director

Board of Directors:

Bret Bradford	Thea Thomas
Bill Lindow	Matt Maxwell
Brad Reynolds	Danny Carpenter
Phil Oman	John Williams
Emma Owecke	

**From:** Daniel R  
**Sent:** Wednesday, May 17, 2023 9:23 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Federal Fishery Disaster

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

To whom it may concern,

Regarding the recent disaster determination for the 2018 and 2020 Copper River and Prince William Sound salmon fisheries, I am writing to share my voice in this consideration. As a 17 year crew member and veteran of the Alaska commercial fishing industry, I want to make sure these funds are designated for the appropriate members and are ensured to be shared appropriately. Previous disaster funds have been successfully claimed, yet no consideration has been made for the reimbursement of the crew members of the vessels affected. In short, these funds get distributed to owners/operators —which is great for them — but are not always distributed to the crew members who are integral to all these commercial operations. I am writing in hopes that perhaps this round of relief may be specifically designated to be shared with the crew members who keep these fisheries in operation. I would like to see these funds divided up just as our crew contracts are drawn up - often around 10% of the catch share. I would like to see specific wording guaranteeing these funds make it to the appropriate crew members. Without commercial fishing crew, these boats could not operate.

Please include stipulations that the funds dispersed are part of a mandatory disbursement to the crew that were on board for these seasons affected.

Daniel

**From:** Darin g  
**Sent:** Friday, May 12, 2023 1:18 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster Drift Gillnet

Looking at the spend plan, it should be based off a 5 year average for the fishermen. The complaint about this style of disaster relief is what about new entrants that don't have the history in the fishery? A simple solution would be to take a five year average of the fishery, say its 50,000 dollars and in 2020 the new entrant made 35,000 dollars. Well the new entrant would be compensated 15,000 dollars. This is more than fair to the new entrant. Being a new entrant into a fishery you are likely to be in the lowest quartile of the fishery.

Sea Grant has a description about new entrants and what to expect when buying into a fishery.

[Alaska Sea Grant: Step 2: Determine Your Fishery's Value](#)

On the website it is stated "a first year fisherman is more likely to be in the bottom group than the top quartile, so it is prudent to put yourself in the bottom half of gross earnings in you first few years, and plan how to manage your expenses and debts accordingly."

By giving the new entrants a fleetwide average over the past five seasons and compensating them based on that average is more than fair to the new entrant.

-Thank You

**From:** Darin gilman <>  
**Sent:** Tuesday, May 9, 2023 9:19 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Initial Spend Plan

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionately high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

**From:** Darin gilman <>  
**Sent:** Monday, May 8, 2023 7:01 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Initial Spend Plan

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.  
The majority of fishery disasters have been based off quartiles to date, it should remain that way.

Also, would like to advocate for some apportionment to be delegated out the processors proceeds to tender fleet. Could be based off an average of number of days tendering over the past five seasons and show lost number of days in 2018 and 2020.

-Thank you

**From:** Elliott I  
**Sent:** Thursday, May 11, 2023 7:05 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** comments

Hello this Elliott Irvin, setnetter from the eshamy district. I would first like to thank you for your hard work putting together this spend plan. After reading the details it is obviously well thought out and conscientiously addresses the needs of all the affected stakeholders. From the perspective of a setnetter there is one aspect of the plan that could be examined further. In 2018 the copper experienced what most would call a run failure. As a result the entire drift fleet moved across the sound to the eshamy and coghill district. Normally, half the fleet would remain in Cordova. For the setnetters the result is predictable and obvious. With twice the amount of gillnets in the only small area we are allowed to fish, we will generally catch half the amount of fish. The added pressure in 2018 had a direct financial impact. That was a tough year for everyone, after looking at my tax returns we did earn far less than a typical year. This is just some food for thought! Again I want to thank you for doing a great job on this spend plan. I don't know if any of us deserve anything, it is called fishing not catching. That being said I certainly won't complain about getting money. Thanks for reading my two cents.

**From:** Erik S  
**Sent:** Wednesday, May 17, 2023 7:48 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Spend Plan Comment: 2020 Copper River and Prince William Sound (PWS)

Hello,

Permits used for hatchery cost recovery should not be included in the harvester category. I'm sure that we have made up for their loss, in the years that followed.

When the fishermen don't make the money needed fishing, we go out and get winter jobs to pay for our short comings. Cost Recovery is never really "out" anything. The money gets made up the following years. Would the additional disaster money go directly to the workers who missed out on hours in 2020 or would it just be going back to the Board for the general fund?

Thank you,  
Erik Scott  
F/V Early Run



**From:** fred m  
**Sent:** Saturday, May 13, 2023 5:19 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Copper River and 2020 PWS Draft Spend Plan

Attn: Karla Bush,

I believe that the disaster money should be distributed amongst the CR/PWS Gillnet fleet by some type of catch history, rather than evenly distributed to all permit holders.

Not all fisherman are the same. For some, it is the only source of income they have to support their families. It is treated as a business. They take out loans, go in debt, and have to work hard to make ends meet. For others, it's a side job. They have a good winter job with retirement and benefits, and their time and capital investment in the fishery is minimal. There are also spec buyers in the permit market that put a few landings a year on their permit just in case a possible buyback, or in this case disaster money comes along the way.

Please check out the quartile system on the CFEC database. This would be an excellent guideline. I have no idea of how many comments that you are receiving on dividing up these funds. I do know that 20% of the fisherman catch 80% of the fish, so please keep that in mind if you get more comments wanting an even distribution. Thank you for your time,

Fred Marinkovich  
CFEC Permit # S03E

**From:** Guido C  
**Sent:** Wednesday, May 17, 2023 11:58 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Copper River and 2020 PWS Draft Spend Plan

Generally I support the draft spend plan as written. I was happy to see that each eligible permit holder will receive equal shares.

I am a hard NO regarding COST RECOVERY vessels receiving any additional disaster funds. They were paid already for their services by the processors and then participated in the commercial fishery.

And finally it was unclear regarding the 10% crew share payment. It could be interpreted that crew members were receiving 10% off the top of the entire allocation for a particular gear group they fished in. That can't be correct, can it? I think fisherman who employed a crew member should get a 90% share and his or her crew would receive 10%. This issue is very confusing for those that I have discussed it with. In any case I will reiterate. Fisherman who employed crew should receive 90% and crew 10%.

Thank you for considering these comments. Regards, Richard Casciano

**From:** Jennifer L  
**Sent:** Monday, May 15, 2023 2:55 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Copper River and 2020 PWS Draft Spend Plan

To Whom it May Concern -

As a lifelong gillnet fisherman in the Prince William Sound, I am strongly encouraging you to use a five year quartile average in determining the distribution of resources intended to support the losses connected to the 2018 and 2020 Copper River and 2020 Prince William Sound chinook, sockeye, and chum salmon fisheries. Calculation of the five year quartile average is the quickest and most equitable way to determine the impact the disasters had on individual business related to their production and business model. We are all individual businesses and should be recognized as such. The data necessary to perform the calculation is easily available to the State of Alaska and the Alaska sea grant actually references the quartile reports as accurate information for business planning. In the spirit of the disaster declaration, the idea of equal shares is not an equitable nor fair way to distribute the limited resources.

**Please support the five year quartile average methodology.**

Thank you for your consideration.

Willard Larson

Interesting.

I don't know what the percentage should be, but far less than ten. Maybe 5.

Most of us are solo operators. I can think of 1 friend that has a crewman, but any other operator that comes to mind just fishes by themselves. Myself included.

I think with 10% withheld, the limited number of crew will get a larger percentage than is representative of reality, while most permit holders will artificially get reduced by 10%.

My two cents

Thanks

James

**From:** jerry m  
**Sent:** Saturday, May 13, 2023 8:21 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster funds

The gillnet shares should be equal  
Jerry mccune

Joe Reutov

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. It should be based off a 5-year average. Fishermen are independent businesses, and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a person's hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore, they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionately high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

Joe Reutov

**From:** John J  
**Sent:** Monday, May 8, 2023 7:22 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster determination for 2018 and 2020 Copper River and Prince William Sound

I am resending my comments from May 10, 2022 with the addition of line 5.

I would like to voice my opinion on Equal Shares vs Catch History. I am very much in favor of Equal shares for several reasons,

- (1) Break downs, they do happen and if a fisherman loses an engine he or she could be down for several openers and if that happens during any peak time it can be very costly and it does happen and it happens every season.
- (2) New people buying into the fishery would be impacted very much because they do not have a catch history but they are invested in the fishery the same as everyone else, I have been in the fishery for 53 years and I have no issue with equal shares including these new fishermen. Very simple, the people that want to go off of catch history for these two years would not be the same people that would want to go with equal shares on any other given years, as we all know as fishermen, you may be top dog today but on other days you are fighting with breakdowns, health issues along with many other things that get in our way to making a living.
- (3) Expedience for payout. By going with catch history the time frame to payout would be longer and most fishermen would want to receive their share and catch up from the poor seasons.
- (4) Family hardships. Sadly family issues happen, sickness, injuries, family death, and they may happen during the peak time of fishing, things happen out of our control so we have to do what we can to mitigate our lost opportunities and most of the time those lost opportunities can not be made up. The only fair way in my opinion is Equal Shares to all fishermen.
- (5) If payout is based on catch history, then the top fishermen for these 2 years would be receiving the bulk amount which conflicts with the main reason for disaster funds, which are to help those people that have been impacted. Everyone that fished in those 2 disaster seasons were not impacted the same, so catch history would be rewarding those that had the biggest income or would be rewarding those that had the worst income for 2018 and 2020. This is why I am in favor of equal shares to all that fished in 2018 and 2020. It does not favor one group over the other, instead these funds would give everyone equal shares to help everyone impacted equally. Those that were on the top of the catch history for 2018 and 2020 would not be receiving what they may feel entitled to and those that made very little may feel they should receive more due to poor seasons, but equal shares would help every fisherman that was impacted for 2018 and 2020.

If there was a survey or questionnaire sent out to all 500 plus fishermen it would come back heavily in favor of Equal Shares without a doubt, one only needs to look at the average income for these fisheries vs the incomes made by the top 10% of the fleet and it would not be close. Every fisherman has felt the heavy burden of a poor season even when the season itself was good, just from the reasons I laid out above. We as fishermen have all felt the highs and lows of our business so we should all agree (in a perfect world) this is not the time to see how much the individual can get over the whole because they may happen to be on a high note as far as the disaster years are concerned. Thank you, John Johnson

**From:** jordan s  
**Sent:** Sunday, May 14, 2023 8:13 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Who I have fished for

I crewed deckhand 2019 gillnet for a boy I grew up beside. [REDACTED]

[REDACTED].  
I no longer and since then consider him family or a friend. Have tried burying the hatchet.  
No longer desire too.

[REDACTED]. Not  
much else. He has thrown me/my family name under a bus with false accusations of adultery. To the point, I get  
harassed by others within the sport/drift/seine fleets.

I still pray that the money will not go to the wrong people or any shell scam of false accusations of crew/boat fraud

**From:** jordan s  
**Sent:** Sunday, May 14, 2023 1:10 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Area E disaster relief payment plan

Crew payments should be 3% across the board if at all.- 0%  
Payments,  
For walking on and off a deck?  
I have done more intense fisheries where I didn't make a penny.

2018- no money for permit holders, the west side of sound?  
Flats being closed creates more pressure on the rest of the areas.

I have fished the flats on my boat fall of 2019 for coho. Was crowded then with a poor return of the silver stock.

Since I got my business I crew gillnet (summer of 2019) for a few days of picking pink and wasn't paid anything but  
harassment.

Finally got my boat going again after months of working for others.  
Picked a few pinks on west side finished on flats with a few coho.

Crewed on Pws seine boat in 2018. Few weeks. Fv ltwgzxmf fxf xpk r fs stw si~3

I'm not looking for a big paycheck but do not want to see the fleet/state get scammed.

2020 money for seine sockeye?  
Crew should be 3% if at all. Walking on and off a deck.?

2018 processor money but none for the permit holder, west side of the sound.?

**From:** Kari G  
**Sent:** Friday, May 12, 2023 8:24 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Disaster

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

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.  
The majority of fishery disasters have been based off quartiles to date, it should remain that way.

-Kari Gilman

I have a comment about the draft spend plan for the 2018 Copper River Chinook and sockeye salmon and the 2020 Copper River and Prince William Sound (PWS) Chinook, sockeye, and chum salmon disaster— regarding this section:

**“Funds are proposed to be paid to the person listed as the 2018 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who did not make any landings in 2018 and certified they were unable to participate to qualify for an emergency transfer and permit holders who permanently transferred a permit away in 2018 will not receive payments.”**

I believe the topic of barring permit holders who permanently transferred a permit away needs to be discussed and given more detail. This statement is too broad and excludes harvesters that deserve payment. If a permit holder fished their permit in the disaster year and held it through the entirety of the salmon season, they should be eligible. For example, if someone fished their permit during the 2018 salmon season but then permanently transferred it away during the fall/winter of 2018, they should still be eligible because they held the permit during the salmon season and participated in the fishery. If they used the permit and landed fish, they should be able to receive payment from this program. Harvesters who held emergency transfer permits will receive payment even though they don't technically hold that permit through the entirety of the year, but harvesters that transferred their permit away after the season would not be eligible to receive payment in the current draft spend plan. All harvesters who held a permit and landed fish during the 2018 Copper River Chinook and sockeye salmon and the 2020 Copper River and Prince William Sound (PWS) Chinook, sockeye, and chum salmon disaster fishery should be eligible for payment even if they permanently transferred their permit after the season, they were all affected by the disaster regardless of permit status after the season ended.

Thank you for your consideration.

Kas

**From:** Kenneth  
**Sent:** Monday, May 8, 2023 5:07 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 and 2020 cr/PWS disaster spend plan comments

Hello,

I am writing comments to oppose the draft spend plan and offer suggestions for improvements. I would urge the commission and ADFG to consider a tiered approach instead of equal payments. Not all permit holders participate equally or were effected to the same level, the drift fishery is very dynamic with multiple runs and so I believe that all payouts should be made based somewhat on catch history. The tiered approach protects the bottom tier so everybody will get something, but does not reward those who didn't actually participate except as hobbyist fisherman.

There is precedent for this with the 2018 gulf of alaska cod disaster. I also would like to point out that not every permit holder hires a deckhand, so sending 10% of the participant total allocation to a crew pool is excessive.

I also believe that allocating 12% to research is very excessive. This should be lowered to 5% and the remaining 7% be paid to participating fisherman.

Please reconsider these changes to make this spend plan more equitable to affected participants.

**Kenneth B Jones**

**From:** Kiril R  
**Sent:** Tuesday, May 16, 2023 10:38 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)

Agree

**From:** Korry V  
**Sent:** Monday, May 15, 2023 10:06 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 Copper River and 2020 PWS Fishery Disaster Spend Plan Comment \*\*Equal Distribution is Unfair\*\*

I am writing to strongly disagree with the proposed equal distribution among harvesters of 2018 CR and 2020 PWS salmon disaster money. "Equal payment" is unfair spending of the money.

All fishers and permit holders are individual small businesses, with highly variable and dissimilar business models. Such that, it is not even close to fair to assume all permit holders had equal losses during either or both of the disaster years. This is a generalized miscalculation. It is however, generally fair to say that in fishing, a lasting business with more expenses would land more fish. And in general, a fishing business that has more expenses would have been hurt more during a disaster season: more losses. So, we can far more fairly parallel landing histories to losses. And can very obviously deem that Equal Payment is not a fair distribution of the disaster funds.

Please consider using a better system to allocate the money than whether "yes" or "no" you were a permit holder during 2018 and 2020. The relief should go to those that felt the disaster the most. The quartile system on the CFEC database would be the best place to start.

Respectfully submitted



**From:** Lloyd M  
**Sent:** Tuesday, May 9, 2023 4:06 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** LLoyd Montgomery

long time commercial fisherman since 1958 ,as a dishwasher on my grandfather's boat in prince william sound  
My step father Art Tiedeman got me my first open skiff pair of oars, 15 horse johnson kicker  
pull my gillnet in by hand , 1963 he got me started gillnetting in copper river and prince william sound area E ,,,  
back for another season on copper river flats and prince william sound Area E .

my boat is the seaseerider ,

going on 75 years old...

my worst years was the covid years

im very thankful for , to hear about the disaster relief funds

Myself would like the funds to be distributed EQUALLY

even thos i haver spent more years than others .....wer were all affected

financially devestATED ME BIG TIME

TAKES 5 YEARS TO RECUPERATE from those bad years...My

My recent PO BOX NUMBER IS

po .box ----

cordova alaska 99574

my email is ----

my diabetes is kicking my body big time ....

Hope to see the FUNDS before i kick the BUCKET along with my good friend Jerry Mccune.....

if i werte to die before the funds are sent out please consicer my mate as a Beneficiary

Stephanie Lennox Laughlin

phone number is -----

**From:** Mark H  
**Sent:** Thursday, May 18, 2023 7:27 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)

Hello,

I am an Area E drift gillnet fisherman and permit holder

I am advocating against an equal share for the 2018 Drift Gillnet Disaster and am advocating against an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database that disaster funds could easily be distributed based off of. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery.

Fishermen should be compensated based on their real potential loss, not for just holding a permit. Permit holders who fish part of the season or fish at their leisure shouldn't be compensated the same as fishermen who rely on the fishery as their main source or income.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.  
The majority of fishery disasters have been based off quartiles to date, it should remain that way.

Thank you for your consideration,

Sincerely,

Mark Hazeltine

**From:** Matthew M  
**Sent:** Sunday, May 14, 2023 8:00 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster relief comments please read

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most. The majority of fishery disasters have been based off quartiles to date, it should remain that way.

Thank you for considering,  
Matthew Maxwell  
Area E Drift  
Fv October Skye

--

Matt Maxwell

**From:** Michael B  
**Sent:** Wednesday, May 17, 2023 9:37 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018/2020 Copper River and 2020 PWS Draft Spend Plan

I would like to submit my comments on the draft spend plan. I would prefer that fisherman's portion of the spend plan be done not by equal split but by CFEC data on individual's catch history. Maybe go back 5 years and if you have less than that you get average?. Some fisherman work harder and fish longer and invest and take better care of their equipment than others because the fishery is their main source of income, not a side gig. The processors share is not being awarded by equal split because some processors have a larger market share. The same logic should apply to the catchers. Thank you for opportunity to provide input to the draft plan,

Michael Bowen

**From:** Nick N  
**Sent:** Tuesday, May 16, 2023 1:10 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Comment on equal share vs quarterly payout

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

The disaster money should be delegated to the fishermen that felt the disaster the most.  
The majority of fishery disasters have been based off quartiles to date, it should remain that way.

Thank you for listening  
Nicholas Nebesky

Sent from my iPhone

**From:** Patrick  
**Sent:** Tuesday, May 9, 2023 1:19 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Re: comments on 2018/2020 area disaster

I need to add one more comment,

I believe the crew/permit holder split is too high as very few vessels employ crew members in area E drift gillnet fishery. I would suggest that the average number of crew members per permit is less than one half.

I think 5% would be more in line with how the drift fleet operates.

Patrick McCormick Comments on spend plan:

Research:

\$4 million is a very small amount for research in the overall scheme of things, it is important that grants go towards projects with other sources of funding, and perhaps existing projects, or with additional sources of funding.

I would like to see monies directed toward answering basic questions about hatchery wild interactions, in 2020 most fisheries disasters were due to lack of production from hatchery stocks. It is becoming clear that hatchery production may not be sustainable at current levels, and quantifying the impact and refining best practices is paramount to continued success of Alaska's fisheries.

Furthermore management in area E is dominated by hatchery success or lack thereof, causing the department to forego harvest opportunities on healthy wild stocks in favor of protecting hatchery cost recovery. The impacts of these management decisions should be quantified both from a biological and economic perspective.

Harvesters:

Cost recovery vessels should not be included in the harvester as they did not bear the brunt of the disaster, furthermore cost recovery goals were increased in subsequent years allowing additional opportunity for cost recovery vessels. Lastly most if not all cost recovery vessels participate in common harvest fisheries and would be eligible for disaster relief as permit holders in affected fisheries.

Criteria for crew shares of disaster relief funding should include crew members who work with a CEFC permit card rather than a crew member license as many drift gillnet permit holders also work as crew on seine vessels using their permit card rather than a crew member license.

Processors:

Tender operators should be the primary recipient of disaster relief payments, in general processors are protected from lack of supply due to diverse portfolios and large corporate size, lastly processors dramatically cut ex vessel prices to make up for poor returns, even while wholesale prices soared to record levels. It is imperative that processor share of relief funding goes to workers and not corporate profits, this includes tender operators who took the largest hit in the 2020 season.

**From:** Petro B  
**Sent:** Wednesday, May 17, 2023 9:11 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Disaster relief funds

To whom it concerns,

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. It should be based off a 5-year average. Fishermen are independent businesses, and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a person's hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether they hold a permit and leisurely or moderately participate in the fishery.

We can draw a parallel between the processors and fishermen. Why is it not proposed the processors have an equal share between them? First thought is that it wouldn't be fair to give a large processor the same amount as a small processor. A large processor has more overhead, buys and sells more fish. Therefore, they have a larger loss of income on disaster years. The same rules apply to the fishermen, some fishermen have larger boats and overhead, some catch and sell more fish than others and they also show a larger loss of income.

Looking at the crew apportionment to the Drift Gillnet fleet. It says that 10 percent of the funds being solicited are being appropriated to crew, this is disproportionately high. Half the drift fleet does not have crew in this fishery. It should be more around five percent of the funds dispersed. Giving 10 percent is taking away from the drift gillnetters that don't hire crew for their operations.

Thank you!

Petro N. Basargin

F/V Grey Goose

**From:** R M  
**Sent:** Saturday, May 13, 2023 10:49 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Fisheries disaster relief

No equal

Shares we are all individual businesses like the processors and using a five year quartile average is the quickest fairest way to calculate the effects on each business related to their production and business model. This information is easily available to the state and Alaska sea grant actually references the quartile reports as accurate information for business planning .

Many fishermen have invested more money in vessels, gear, time etc. as well as put in more effort to earn a better living. How is it fair that a person that puts little effort in the fishery, doesn't adapt or try to evolve in an ever changing fishery, get a uniform share of this disaster relief?

Sincerely, Randy W. Merritt

**From:** Sarah E  
**Sent:** Friday, May 19, 2023 7:19 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Cc:**  
**Subject:** Comments: 2018 & 2020 Copper River Disaster Spend Plan

### **Comment: 2018 Copper River and 2020 Prince William Sound Processors**

The designated first and foremost guiding principle of the 2018 and 2020 Copper River spend plan is:

*“assist fishery participants harmed by the 2018 and 2020 fishery disasters.”*

Also stated:

*“Disaster payments to processing companies are proposed to be **pro rata** to each company’s demonstrated loss relative to the total loss of all eligible processing companies.*

Comment:

The process for distributing economic support to a particular subset of the Shore Based processor fishery participant group has consistently fallen short, despite this user group’s COAR report being utilized in the determination of the overall impact on their sector and in the creation of payment tier levels which are specific to the category of the license they actively operate under.

This subset fishery participant group is made up of Shore Based Processors that utilize a custom processor and do not have a DEC license.

Shore Based Processors in this category adhere to the same licensing, bonding and taxation structure as entities with an active DEC permit.

It is important to recognize that although this fishery participant does not possess a DEC license they do buy and sell fish, hold a surety bond and follow all of the same requirements as a DEC permit holding Shore Based Processor.

There is no differentiation in State of AK licensing, tax basis or COAR reporting requirements for these two subsets.

This ADFG State of Alaska licensed group suffered significant losses during the 2018 & 2020 disaster years as well as during the covid crisis. However, unlike other fishery participants, no assistance was made available.

Shore Based processors without a DEC permit were completely excluded from much needed covid relief funds. Their COAR reports were included in distribution calculations during both Round 1 & 2 of the CARES Act fisheries assistance program that was jointly administered by NOAA and the North Pacific States Marine Fisheries Commission (NPSMFC).

Exclusion from prior funding events has left Shore Based processors without a DEC permit, also without the much needed and very necessary post-covid, post-disaster economic support.

We offer the following additional comments on behalf of this category of licensed, regulated and taxed fishery participants that have their COAR reports utilized for distribution allocations and yet, to date have received no funding.

- 
- Processor
- eligibility criteria needs to include licensed Shore Based processors that utilize a custom processor and do not have a DEC license.
- 
  
- 
- Licensed
- Shore Based processors that were active in the 2018 & 2020 disaster fishery years, that were excluded from receiving NOAA/NPMFC CARES Act funds on the basis of not having a DEC license should receive an additional 2020 disaster allocation percentage equal
- to the payments they did not receive in their otherwise qualifying tier level for Round 1 & 2.
- 
  
- 
- The
- demonstrated loss this fishery participant group has experienced is greater compared to those that have already been the recipient of federal and state aid.



The economic hardship they have suffered has not yet been remedied in any manner.

- 
  
- 
- The
- COAR production data that 2018 & 2020 disaster plan payment distributions will be based upon is collected in the same manner for Shore Based processors that hold, and those that do not hold DEC licenses.
- 
  
- 
- There
- should be an equitable disbursement of disaster funds that align with the established business classification which is recognized and enforced by the State of AK Dept of Commerce and ADFG.
- 

**Comment: Communities**

Funds should be available to organizations within qualifying communities that work to support impacted fishery participants. Supplying support services and material goods that will increase resiliency going forward should be allowable, if they lessen the financial impacts of low catch years.

**Comment: 2018 & 2020 S03E Permit Holders**

Additional payment allocations could be considered for permit holders that are residents of the impacted communities and also for those with a historically significant delivery history in the disaster areas.

**From:** Shawn G  
**Sent:** Friday, May 19, 2023 1:43 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 2020 disaster fund allocation plan

Please note that the funds allocated for the 2018 copper river failure of kings and reds affected the entire area E gillnet fishery and only by using past production of the entire fishery can you truly gauge and allocate fairly to the harvesting sector participants losses . This goes for 2020 funds as well. The handwringing over how to figure out production by specie is misplaced as the fishery is one fishery Area E gillnet. Thank you, Shawn Gilman

**From:** Shawn G  
**Sent:** Friday, May 19, 2023 7:57 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018, 2020 copper river and pws disaster relief plan comment .

I would like to say that the proposed research percentage of the allocated funds is a bit high and while I support research wholly , 12 percent will possibly lead the state to shirk some of its basic management budget responsibilities as evidenced by the possible proposed use of these funds to create different forecast models. I believe 10 percent would be sufficient and keep the focus on the proper use of funds. We do not want to create an environment where management and industry business models count on disaster funds . Using math and historic participation and production for all entities and stakeholders will keep the unintended consequences of new participants and agencies penciling in disaster relief funds as potential income. Thank you, Shawn Gilman

**From:** Shawn G  
**Sent:** Wednesday, May 17, 2023 8:30 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018, 2020 pws disaster fund allocation metrics.

I wish to comment on the proposed spend .

The tender operations are definitely included in the processor cost matrix. I think municipalities having payments reflective of their participation is fair , the same fairness seems to have been left out of the harvester portion suggested payment plan. Equal shares are not a fair way to distribute and it is glaringly obvious from the municipalities and processor spend plan suggestions that it would be almost criminal to advocate for equal shares for only one portion of the disaster stakeholders. Please use participation and history to fairly distribute funds to harvesters as well. Thank you, Shawn

**From:** Shawn G  
**Sent:** Saturday, May 13, 2023 9:52 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Area E 2108&20 spend plan

I am busy getting ready for the season and have not engaged in the process other than an initial comment .. as the fleet arrives and readies itself it is very apparent how different the individual and unique business models for each fisherman are. Each business makes its own decisions and directs it's time and resources as it wishes. The Adfg comment for equal shares means these differences in time, effort and resources dedicated to business are being ignored for the catcher portion of the industry but not being ignored for the processor portion . Sea grant has a great page for entrants into any fishery in Alaska and very clearly states that the quartile reports are a great and accurate resource to gauge how these business models perform over time . A five year quartile average for permit holders is easy math and more fairly represents the effects of the fishery failures being addressed. I would say that a portion of the funds should be set aside to address the few cases that may have circumstances that the quartile may not address but by no means should we ignore different business models in the catcher portion of the fund apportionment while using rational thinking and math to address other sectors like processing and municipalities. I would also say that in my 42 years of fishing area E that never more than 40-50percent of the fleet has a crew so while I applaud looking out for crew since some fisheries in the past had some captains abuse the trust and not pay crew retroactively I hope the number of 250 possible crew is used to keep this process moving forward accurately. thank you, Shawn Gilman

**From:** todd I  
**Sent:** Thursday, May 11, 2023 11:37 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Regards to 2018-2020 disaster

I am not advocating for an equal share for the 2018 Drift Gillnet Disaster nor am I advocating for an equal share for the 2020 Drift, Setnet and Seine disaster.

We have a quartile system set up on the CFEC database the disaster funds should be distributed based off quartiles. Fishermen are independent businesses and they should be treated as such. Some fishermen's businesses were affected more adversely than others. The quartiles reflect a persons hard work and time commitment to a fishery. Fishermen should be compensated based on their hard work and time commitment to a fishery not whether or not they hold a permit and leisurely or moderately participate in the fishery.

**From:** Tyler D  
**Sent:** Wednesday, May 10, 2023 7:52 AM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** Comments fisheries disaster spend plan

To whom it may concern

I am a Cordova resident, a fisherman and fleet/assistant plant manager for the PWS/CR fisheries. I am advocating for a quartile system be implemented not an equal share program. Fishermen are each independent businesses that put in different levels of efforts at their business. It should be recognized by efforts who has bene affected by this individually, not equally.

I am also advocating that tenders get allotted a percentage of the disaster money as they were equally effected in their business from loss of fishing days/contract days.

Thank you,  
Tyler

Tyler Dillon | Fleet Manager | Assistant Plant Manager

**Camtu's Alaska Wild Seafoods**



**From:** Tyrell S  
**Sent:** Friday, May 12, 2023 1:16 PM  
**To:** DFG, ComFisheriesDisasters (DFG sponsored)  
**Subject:** 2018 and 2020 Disaster Relief Spending Plan

To Whom It May Concern,

I have been drift gillnetting the PWS Area E for the past 15 years and feel compelled to comment on the proposed allocation of 2018-2020 disaster relief funds.

I am not in favor of the equal distribution of funds to harvesters. I strongly prefer the system based upon individual catch history that was used to distribute funds from the 2016 disaster relief. This system much more appropriately distributes funds to permit holders based on their historical investment, participation, and effort.

Every year we see a wide range of fish sales from one permit to the next due to a huge range of effort, involvement, and financial investment from one permit holder to the next.

Many full-time fishermen have a significantly larger investment in time and money into the Prince William Sound Drift fishery than do the part-time or semi-recreational fishers. These full-timers were thusly significantly more impacted in the 2018 and 2020 disasters than, say someone who historically fishes 2 weeks on, two weeks off, while holding a steady job on the slope.

The dual permit holders are also over compensated for in an equal distribution payout. In the equal share system, an Area E Drift Gillnet and Seine permit holder would be paid an equal share from both the gillnet and the seine fund, effectively double dipping when compared to a single permit holder. Had 2020 been a normal season, these dual permit holders would have expected to split their efforts between the two permits and therefore split their income.

The funds for this disaster relief are allocated from NOAA based upon 2018 and 2020 seasons' deviation from the historical norm for fishery sales. Therefore, to distribute them to the permit holders in any way other than based upon their individual deviation from their historical norms seems like a misappropriation of these funds.