



May 31, 2024

Final Draft Spend Plan for funds appropriated to address the 2022 Yukon River salmon disaster determination. NOAA Fisheries has allocated \$1,594,841 million for this salmon fishery disaster. The spend plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Process to develop the spend plan: ADF&G provided an initial draft spend plan for public comment in March 2024 and received one written comment. ADF&G revised the plan based on that comment and posted a second draft spend plan for public comment in April 2024. Two additional comments were received (Appendix 1). In response to comments received on the second draft spend plan, ADF&G made the following revisions:

Research

- ADF&G maintained the 10% allocation and supports directing these funds to develop and administer cultural education programs in the Yukon River watershed to promote intergenerational sharing of traditional knowledge and practices.

Allocations

- ADF&G changed the allocation for sport fishing businesses to ~5% because there is only one eligible sport fishing business that primarily targets Yukon River salmon. Although sport fishing businesses were not included in the spend plan for the 2020 and 2021 Yukon River fishery disasters, funds intended for the 2022 disaster cannot be used to supplement other disaster years.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2022 Yukon River salmon fishery disaster and 2) improve fishery information used to assess and forecast future fishery performance and to develop management approaches that avoid and/or mitigate the impacts of future fishery disasters that cannot be prevented.

The categories and allocations for this draft spend plan were informed by the 2020 and 2021 Yukon River salmon elements of the “Statewide” salmon spend plan and public comments.

Category	Allocation	Estimated funds^a
Cultural Education Programs	10%	\$151,500
Communities	3%	\$45,500
Commercial and subsistence participants	82%	\$1,241,399
Sport fishing businesses	4.9%	\$75,000
Program support	0.1%	\$1,700
Total		\$1,515,099

^aAdditional funds will be allocated to Pacific States Marine Fisheries Commission (PSMFC) to administer the federal grant.

The impact of the fishery disaster created significant loss of income to those involved in the harvesting and processing sectors and to the communities in which the cultural and basic economic structure is the marine economy. A portion of these funds will be allocated to education and outreach to mitigate the negative impact that closed subsistence salmon fisheries have had on the sharing of traditional knowledge and practices. Funds will also be used to help assist individuals, processors, businesses, and fishing communities that were affected by this fishery resource disaster by recognizing the loss of economic benefits due to the fishery disaster. Direct payments will compensate participants consistent with fishery investments and/or historical fishery performance. Historically one of the purposes of disaster funding was to get funds to communities and fishery participants as fast as possible. Direct payments provide that method.

Cultural Education Programs – 10% (\$151,500): These funds are intended to support the development, administration, and operation of cultural education programs to help mitigate the impacts of limited and closed subsistence salmon fisheries on the intergenerational transmission of traditional knowledge and practices. Funds should be made available through either direct payments or a non-competitive funding opportunity through a subaward to the federal grant for Tribal and Tribal-serving organizations. Receiving fishery disaster funds for cultural education programs does not explicitly authorize the harvest of weak salmon stocks.

Communities – 3% (\$45,500): ADF&G allocates a portion of the disaster funds to municipalities and boroughs that rely on revenue generated from salmon landings and other economic activities related to the salmon fisheries. The State’s Fishery Business tax rate is 3% for shore-based landings and is shared 50/50 with the state and municipalities where the landings occur. These local government entities were negatively impacted by the fishery disaster because fishery revenues comprise a significant portion of local operating budgets and are used to support education, public works, and other services.

Direct payments will be made to affected municipalities and boroughs with a demonstrated loss of salmon landings due to the fishery disaster. ADF&G allocates 3% to affected communities to help mitigate losses in fish tax and other economic losses due to the fishery disaster.

Eligibility criterion for communities:

- Yukon River salmon must have been landed in the community in 2020 based on the port of landing from ADF&G fish ticket data.

Based on this criterion the only eligible community is Emmonak, which had a demonstrated loss of salmon landings due to the fishery disaster.

Commercial and subsistence participants - 75%: Commercial and subsistence harvester funds are allocated proportional to the estimated loss in each of the following fisheries:

Fishery	Estimated loss due to fishery disaster	Proportion of total loss	Allocation
2022 Yukon River commercial	-\$3,948,798	13.3%	\$164,509
2022 Yukon River subsistence	-\$25,849,239	86.7%	\$1,076,890
Total	-\$29,798,037		\$1,241,399

Subsistence Fisheries

2022 Yukon River subsistence: \$1,076,890

Subsistence households in the Yukon River area are eligible for direct payments based on the number of shares they qualify for and the total allocated funds.

Eligibility criteria for subsistence households are based on criteria that were developed for Section 12005 CARES Act Fisheries Assistance. One household member will submit an application for the household. Eligible applicants will be placed into tiers based on household size in 2022. Smaller households with 1-3 members will be eligible for one share and households with 4-6 members will be eligible for two shares. Households with 7-9 members will be eligible for three shares and households with ten or more members will be eligible for four shares.

Household size	Number of Shares
1-3	1
4-6	2
7-9	3
10+	4

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

Subsistence household eligibility requirements:

1. All eligible household members **MUST** be Alaskan residents meeting at least one of the following criteria:
 - a) Eligible to receive an Alaska Permanent Fund Dividend for calendar year 2022.
 - b) Possessed or eligible to receive a 2022 Alaska resident sport fishing license from the Department of Fish and Game.
 - c) Registered as a resident during 2022 with the Commercial Fisheries Entry Commission (CFEC).
2. Applicant for household **MUST** be at least 18 years old to apply per federal requirements.
3. **MUST** self-certify that they are not de-barred from receiving federal funds and are not on the federal government “do not pay list”.
4. Eligibility will be determined by Alaskan household.
 - A household is defined as a person or persons having the same permanent residence.
 - All Alaskan households participating in subsistence fisheries may apply regardless of physical household address.
 - Only one application may be submitted per household.
5. **MUST** self-certify that one or more members of the household participated in the Yukon River salmon subsistence fishery in at least two of the previous four years when the fishery was open (2017-2020).
 - Participation includes harvesting, sharing, and/or using salmon subsistence fishery resources. Subsistence harvest does **NOT** require the use of a sport fishing license.
 - Subsistence fisheries are defined as fisheries on salmon stocks for which the Alaska Board of Fisheries has found there are positive customary and traditional uses, in addition to federal subsistence fisheries that have no state equivalent.

- 6. Eligible applicants MUST self-certify that their household has incurred a negative impact on their ability to access subsistence salmon fishery resources in 2022 that was directly or indirectly related to the fishery disaster.

Commercial Fisheries

2022 Yukon River commercial: \$164,509

2022 Yukon River Commercial	Allocation	Estimated funds
Harvesters	90%	\$148,058
Processors	10%	\$16,451
Total		\$164,509

Yukon River Permit holders – 90%

Eligibility criteria for Yukon River permit holders:

- Permit holder must have had a valid S04Y or S04P permit in 2022. A permit is considered valid if fees were paid to renew the permit in 2022.

Funds are paid to the person listed as the 2022 ‘Permit holder’ and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate in 2022 in order to qualify for an emergency transfer and permit holders who permanently transferred a permit away before the 2022 salmon season will not receive payments. Each eligible permit holder will receive equal payment. An estimated 332 permit holders would be eligible for equal payment.

Yukon River Processors – 10%: Yukon River salmon processing companies that meet the eligibility criterion are eligible for payment based on the average wholesale value of Yukon River salmon processed by the company from 2017 through 2019 using Commercial Operator’s Annual Report (COAR) data.

Processor eligibility criterion:

- Processing company must have processed Yukon River salmon in 2019 or 2020.

Disaster payments to processing companies are pro rata to the company’s demonstrated loss. The loss is calculated as the company’s 2017 through 2019 average wholesale value for Yukon River salmon.

Sport Fishing Businesses – 4.9% (\$75,000): Sport fishing businesses operating in the Yukon River area with reported salmon trips are eligible for direct payments if they can attest to having documentation/records to demonstrate a minimum loss of 35% in revenue for 2022 as compared to the 2015 through 2019 average, the most recent five-year period that does not include a fishery disaster.

Sport fishing eligibility criteria:

1. The sport fishing business must have reported Yukon River salmon trips in the ADF&G freshwater logbook for a minimum of three years from 2015 through 2018.
2. The sport fishing business applicant must certify that they incurred a minimum loss of 35% in revenue for 2022 as compared to the 2015 through 2019 average.

Based on this eligibility criteria, ADF&G estimates one business is eligible for direct payment. If more than one business is eligible, funds will be distributed pro rata to each company's demonstrated loss relative to the total loss of all eligible companies.

Program Support – 0.1% (\$1,700): ADF&G is designating funds for staff working on fishery disaster plan implementation in coordination with Pacific States Marine Fisheries Commission.



May 3, 2024

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Comments submitted via email at dfg.com.fisheriesdisasters@alaska.gov

To whom it may be concerned,

Tanana Chiefs Conference's (TCC) is incorporated as Dena' Nena' Henash, which translates to "Our Land Speaks." As good tribal stewards and to honor our culture and spiritual customs and traditions, we speak for the land, waters, and animals who no longer can speak for themselves. TCC is an Alaska Native non-profit corporation, charged with advancing Tribal self-determination and enhancing regional unity among the tribal citizens of our member Tribes and associations. We serve and represent 42 Alaska Native communities, including 37 federally-recognized Tribes, and more than 18,000 tribal citizens throughout Interior Alaska.

Restoring tribal stewardship of our fish, animals, lands, and waters for our future generations is one of our highest priorities and obligations as Indigenous peoples. TCC works toward meeting the health and social service needs of Tribal citizens and beneficiaries throughout our region. Our programs and services range from direct healthcare services to tribal development services, tribal resource stewardship, public safety, community planning and transportation. Our people's lives depend on the resources this land provides.

TCC references our March 13, 2024 comments on the 2022 Yukon River Salmon Fishery Disaster Initial Spend Plan. TCC generally supports the Second Draft Spend Plan for the 2022 Yukon River salmon disaster determination. However, TCC does not agree with reducing the subsistence fishing allocation by 15% (\$156,019) to establish a new category of relief for a single sport fishing lodge. Fifteen percent is excessive given the extreme hardship experienced by subsistence fishing households and the disproportionate relief that one lodge would receive whose operators are not year-round residents of the Yukon River. Furthermore, the allocations on page one total 100.1% and the allocation to commercial and subsistence participants on page three erroneously state 70%, when it should be 75% to be consistent with allocations summarized on page one.

Research – 10% (\$151,500)

With respect to the 10% allocation for research, currently TCC does not support feasibility studies for hatchery efforts on the Yukon River. In March 2024, the Full Board of Directors passed resolution 2024-12 Opposition to Artificial Salmon Enhancement and Hatcheries in the Yukon

River Watershed. TCC's concern is that recent scientific literature has indicated that hatcheries and artificial salmon enhancement requires significant sources of funding but have been shown to contribute very little to the restoration of wild salmon stocks. TCC contends that more research on the status of Yukon River watershed salmon spawning grounds and the life history of juvenile salmon is necessary to understand specifically the ecological and biological processes affecting salmon populations before considering enhancement or any type of hatchery mitigation.

Based upon the poor performance of chum salmon management using only the drainage-wide run reconstructions of summer chum and fall chum salmon, these reconstructions must better incorporate tributary escapement needs to ensure sustainable chum salmon stock diversity in light of ongoing environmental change. Specifically, run reconstruction models must incorporate in-river mortality to ensure that commercial fisheries are not prosecuted on the lower river to the detriment of upriver tributary escapement goals and stock assessment projects like the Henshaw Creek weir, which TCC operates, as well as upriver subsistence needs like occurred in 2019.

TCC supports research specifically focused on spawning tributaries to ensure drainage-wide run reconstructions for Yukon River Chinook salmon and chum salmon stocks are more effective management tools. This research can inform and update documented spawning grounds, and add new spawning grounds to the Anadromous Waters Catalog, thereby protecting spawning and rearing habitats.

TCC also supports advancing the understanding of environmental impacts from anthropogenic activities on the Yukon River. We would like to work in partnership with Alaska Department of Fish and Game (ADF&G) on these efforts. For example, TCC has long been concerned about the impacts of significant amounts of recreational boating traffic up the Salcha River, which is a significant contributor to Yukon River Chinook salmon runs. TCC would like to see specific research conducted on the Salcha River salmon spawning grounds to assess possible impacts on redds, egg and hatchling survival, and juvenile outmigration and rearing life histories.

TCC is fully supportive of funding allocations to develop and administer Elder-Youth culture camps throughout the TCC region to ensure intergenerational transmission of knowledge. This supports maintaining our people's connection to the salmon. TCC supports this funding being allocated directly to TCC and/or its member Tribes through a non-competitive funding opportunity.

As just mentioned, TCC is fully supportive of focused research efforts on juvenile salmon life histories, out-migrations, and survival. Previously there has not been much effort in this area and TCC sees its importance in order to manage our salmon holistically. TCC would like to work in partnership with ADF&G to conduct this research within the TCC service area.

TCC also supports efforts to better educate the public to ensure proper stewardship of salmon spawning grounds, but does want to point out that education, outreach, or enforcement is not research. TCC member Tribal communities are best situated to monitoring salmon spawning grounds and we support cooperative efforts among state and federal agencies to protect and enhance Yukon River watershed salmon spawning grounds.



Understanding that there is a limited amount of funds, likely only one research item could be addressed. TCC would like to provide prioritization of the research list. We support prioritizing:

- Develop stock-specific distribution models to aid in Western Alaska chum avoidance and run reconstruction derived abundance estimates for chum salmon;
- Exploring spatial and temporal changes in documented Yukon River salmon spawning tributaries;
- Creating and hosting Culture Camps attended by youth and elders to incorporate salmon distributions, fish processing, sharing traditional knowledge and traditional practices, etc; or
- Focused research efforts on Yukon River juvenile salmon life histories, out-migrations, and survival.

TCC requests that the research funds align with the Joint Secretary's Order 3403 and are available for Tribes and tribal consortiums to pursue to advance co-stewardship within our areas. TCC would be interested in pursuing the following research projects for the TCC service area:

- Exploring spatial and temporal changes in documented Yukon River salmon spawning tributaries;
- Creating and hosting Culture Camps attended by youth and elders to incorporate salmon distributions, fish processing, sharing traditional knowledge and traditional practices, etc; or
- Focused research efforts on Yukon River juvenile salmon life histories, out-migrations, and survival.

Communities – 3% (\$45,500)

TCC understands that in 2022 only the community of Emmonak qualifies under this section to receive disaster funds. However, it is important to point out that TCC has spent more than \$1.8M purchasing commercially caught salmon to distribute to our member Tribal communities. This was an attempt to mitigate the closure of salmon fisheries in the Yukon River watershed in the TCC region by providing limited numbers of salmon to address food security needs and to support the continue of our salmon culture by being able to teach our children how to cut and process salmon to continue our ways of life. The fact that we have largely lost our commercial fishing economies many years ago, this funding category seems to leave our region with additional loss and suffering. TCC is expected to continue to have to spend upwards of \$1M annually until salmon stocks are rebuilt. ADF&G, National Oceanic and Atmospheric Administration, and the Pacific States Marine Fisheries Commission should incorporate these fiscal needs into salmon disaster relief funding.

Commercial and Subsistence Participants – 75% (\$1,136,399) [Note: Draft Spend Plan erroneously lists this as 70%].

2022 Yukon River Subsistence: \$985,805

TCC previously commented in our letter regarding the Initial Spend Plan and during a virtual public session with ADF&G's Karla Bush about the need to calculate subsistence losses using 100% of the fish, rather than the previous calculations that reduced the numbers of fish by 25% to



account for heading and gutting to get at edible weights. At that time, TCC and Association of Village Council Presidents provided detailed explanations of why 100% of the weight of harvested salmon should be used to calculate subsistence losses given the delicacy of salmon heads, as well as the non-food-related losses to culture, spiritual relationships, and salmon skins used to make leather for handicrafts, etc. While unspecified within the Spend Plan, we presume that the subsistence allocation was modified from the 12005 CARES Act Fisheries Assistance calculation that used only 75% of the numbers of salmon historically harvested.

As stated earlier, TCC is frustrated by the reduction in the subsistence allocation from 87% or \$1,141,824 in the Initial Spend Plan to the Second Spend Plan where subsistence was reduced by 13% or \$156,019 to establish a new category of relief for a single sport fishing lodge. We recognize that the commercial fisheries allocation was also reduced by more than \$24,000 and redirected to this single sport fishing lodge. Given that ADF&G estimates that 332 CFEC permit holders would be eligible for disaster relief payments with a total allocation of \$135,535, this results in an estimated payment of \$408 per commercial fisherman. It seems highly inequitable that a single sport fishing lodge would receive payment of \$180,200.

Thank you for the opportunity to provide comments.

Sincerely,

TANANA CHIEFS CONFERENCE

A handwritten signature in blue ink, appearing to read 'BRIDLEY'.

Brian Ridley

Chief

Good afternoon and thank you again for the ability to comment on the second draft of the spend plan.

Research

This portion is very important for future replenishment of the Yukon River and its tributaries salmon stock as well as developing awareness of the importance of this natural resource through cultural camps and public outreach. 10% of the grant is a good start for this. As an already established facility 70 miles up the Anvik River where an abundance of spawning has historically occurred, we would very much like to be involved in a pilot streamside hatchery type scenario if possible. Whether it be developing it ourselves or hosting such a project on our property. ADF&G has several decades worth of chinook salmon genetics from the Yukon and its tributaries – what can we do with that data to help determine the cause of this disaster or come up with a viable solution to the problem?

Proposals should be submitted by applicants outlining their intentions and intended outcomes of any research, rehabilitation and awareness projects as well as the costs associated with such.

Sportfishing

The sportfishing sector should receive 25% of the grant allocation as is in line with the CARES grant funding formula.

This fishery disaster is killing the sportfishing businesses in not just the Yukon area but the entire state. While we are very thankful for the small grant opportunities to help subsidize us while these issues are being addressed, we and ADF&G cannot ignore the fact that the sportfishing sector was completely omitted from any grant opportunity attached to the 2020 & 2021 statewide fisheries disaster funding which exceeded \$55M. Had sportfishing been included in this disaster funding at the 12% rate that is being proposed in the second draft spend plan of the 2022 Yukon disaster allocations the amount would have been close to \$7M to be accessed by the statewide sportfishing businesses that are seeing a decline in bookings and revenue as well as facing possible closures because of this disaster. This amount would have helped many businesses.

Speaking for our sportfishing business, we simply weren't made aware of the existence of this \$55M+ grant until it was way too late to comment on it. ADF&G may not have an obligation to let all fishing businesses know about these opportunities, but as was mentioned in the public comment zoom meeting in March 2024, getting the word out to rural residents and businesses is imperative so they have an equal opportunity to comment and apply as appropriate.

We're a very rural business that has relied on marginal at best internet capabilities until last summer when we were able to get Starlink at our place. Once we had decent internet, I happened to stumble upon the existence of this grant opportunity in August 2023 while perusing the ADF&G website. Sadly, at this point the final spend plan had been agreed upon (April 2023) and all comments had been incorporated - without the sportfishing sector being included or even mentioned. With internet that is like or worse than dial-up, us folks didn't have the ability to surf the web for the latest happenings. Email was about as good as it got. Hence the reason we've had to request exemptions for electronic sportfishing licensing for the past few years specifically because we had extremely bad, unreliable, and expensive internet with no alternatives.

ADF&G has always been great at informing us of what we cannot do - such as sportfish for salmon - so why not inform us, as an act of good faith at the very least, of what we can do like secure some grant funding to help us through this disaster, so we don't have to close our doors completely. It appears that the intent of these grants are to give temporary assistance while the disaster is hopefully being mitigated.

The sportfishing industry is extremely valuable to the state economy through tourism and all the related spending that sportfishermen and sportfishing businesses bring to Alaska.

If I sound frustrated I am. Running a rural business is extremely expensive and having the added problems of our natural resources being destroyed is just about too much. The most important thing is to do our best to rehab the fisheries and ensure that this type of disaster is averted for our future generations and to keep small businesses going especially in rural Alaska.

Thank you again for your time and consideration, Cheryl Hickson

Alaska's Anvik River Lodge