



September 21, 2026

Second DRAFT Spend Plan for funds appropriated to address the 2023 Upper Cook Inlet (UCI) East Side Set Gillnet (ESSN) salmon fishery disaster determination. NOAA Fisheries has allocated \$5,750,019 for this fishery disaster. The spend plan informs the federal grant application submitted by Pacific States Marine Fisheries Commission (PSMFC) to NOAA Fisheries and is subject to change based on approval of the final grant.

Written comments are requested on all elements of the proposed spend plan and should be as specific as possible. Comments will be posted as received online and therefore, ADF&G requests that no business proprietary information, copyrighted information, or personally identifiable information be included in written comments. Comments can be submitted by email to:

dfg.com.fisheriesdisasters@alaska.gov or by mail to:

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

Comments must be sent by October 13, 2026, for consideration in the final draft of the spend plan.

Process to develop the spend plan: ADF&G posted an initial draft spend plan in July 2026 and received 6 written comments (Appendix 1). In response to public comments, ADF&G provides the following rationale and revisions to the second draft spend plan:

Allocation Categories

- ADF&G does not propose an allocation to industry trade organizations such as KPFA, which represent a portion of the fishery participants through voluntary memberships. This is consistent with similar requests received during spend plan development for other fishery disasters.

Research

- ADF&G proposes reducing the allocation to research from 10% to 5% in recognition of ongoing research supported by funds from the 2018, 2020, 2021, and 2022 ESSN fishery disasters.
- ADF&G supports the idea of alternative gear reimbursement to assist fishermen and is seeking comment on what types alternative gear should be eligible, whether a cap on the total amount of reimbursement an individual can receive should be considered, proposed total funding for gear reimbursement, or other specifics related to a gear reimbursement provision.

Harvesters

- ADF&G proposes increasing the allocation to harvesters from 62% to 67% to mitigate 53% of the estimated commercial fishery loss.
- ADF&G proposes using buoy sticker purchase for the Upper Subdistrict in either 2022 or 2023 as eligibility criteria to distinguish ESSN participants from other S04H permit holders who do not participate in the Upper Subdistrict. ADF&G does not recommend using the purchase of buoy sticker for only the 2023 season due to the preseason closure that was announced on March

9, 2023, and agrees with the comment that including the 2022 season more accurately reflects participation in the fishery.

- ADF&G does not propose increasing the allocation to crew. Compared to the previous fishery disasters, fewer crew are expected to be eligible for 2023 disaster funds due to the preseason closure announcement which prompted many permit holders to not hire crew for the 2023 season.
- ADF&G clarified that crew with 7-day licenses are not eligible based on their limited fishery participation. ADF&G also included this provision in the spend plan for the 2021/2022 fishery disaster based on recommendations from the public.
- Consistent with the years included for permit holder eligibility, ADF&G proposes crew who held an annual crew license, or a CFEC permit card for any fishery, in either 2022 or 2023 may be eligible for crew compensation. This is in addition to the criterion for a signed affidavit from an eligible permit holder.

Processors

- ADF&G does not propose reductions to the 25% allocation to processors as only those processors with a history of participation in the ESSN fishery, and who have demonstrated a loss due to the 2023 fishery disaster, are eligible for funds.

Guiding principles for disaster fund distribution: Disbursement of funds is intended to 1) assist fishery participants harmed by the 2023 ESSN salmon fishery disaster and 2) improve fishery information used to assess 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 were informed by previous ESSN fishery disaster spend plans and public comments. Allocation percentages and amounts are estimated and subject to change based on administration fees, rounding, and/or recalculations.

Category	Allocation	Estimated funds ^a
Research	5%	\$287,176
Communities	3%	\$172,306
Harvesters	67%	\$3,848,158
Processors	25%	\$1,435,880
Program Support	0.11%	\$6,500
Total		\$5,750,019

^a Additional funds will be allocated to Pacific States Marine Fisheries Commission to administer the federal grant

The impact of the fishery disaster created significant loss of income to those involved in the harvesting and processing sectors and to the communities in which the cultural and basic economic structure is the marine economy. A portion of these funds will be allocated to research activities that promote restoration of the fishery or prevent a similar failure in the future, but they will also be used to help assist the fishing communities that were affected by this fishery resource disaster by recognizing the loss of incomes. These direct payments will compensate participants consistent with fishery investments and/or historical fishery performance. Historically one of the purposes of disaster funding was to get funds to communities and fishermen as fast as possible. Direct payments provide that method.

Research – 5% (~\$287,176): Research funds are intended to support projects that improve available fishery information and help prevent and/or mitigate future fishery disasters. Research funds may also be available for reimbursement opportunities for permit holders who invest in alternative gear to improve Chinook salmon conservation. ADF&G is requesting input on suggested research themes and recommendations on how to structure gear reimbursement opportunities.

ADF&G proposes to distribute research funds through an open competitive bid process administered by PSMFC. The following research themes were highlighted as priorities in previous fishery disaster spend plans:

- Research that improves understanding of the relative importance of specific mechanisms that drive productivity of Kenai late-run Chinook salmon, which could include:
 - how ocean/climate conditions impact future runs;
 - freshwater and early marine survival bottlenecks, habitat use, and movement patterns; and
 - the role of diet, health, and disease on the survival and spawning success of Kenai late-run Chinook salmon.
- Research to inform non-adult abundance estimates of Kenai Chinook salmon that can be used in developing or improving forecasting tools.
- Improved methods for estimating adult salmon harvest and abundance including genetic analysis for stock composition and further assessment and review of the Kenai late-run Chinook salmon estimates of abundance for all age classes.
- Research to investigate how large sockeye salmon escapements to the Kenai and Kasilof rivers may influence productivity and future returns.
- Investigations of Chinook salmon habitat, including intertidal, nearshore, riverine rearing areas, and spawning areas. Research on smolt outmigration and survival.

Communities – 3% (~\$172,306): ADF&G is proposing direct payments to municipalities and boroughs that rely on revenue generated from ESSN salmon landings and other economic activities related to the salmon fisheries. 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, ports and harbors, and other services. The state's Fishery Business tax rate is 3% for shore-based landings and is shared 50/50 with the state and municipalities/ boroughs where the landings occur. If landings occur in the bounds of a municipality and borough, landing tax revenues are shared 50/50 between each entity.

ADF&G proposes using the same eligibility criteria that was used for the 2021/2022 ESSN fishery disaster due to the complete closure of the 2023 ESSN fishery.

Proposed eligibility criteria for communities:

1. Fish ticket port of landing data must show that salmon from the 2021 or 2022 ESSN salmon fishery were landed in the community.
2. Estimated loss in gross revenue value for salmon landed in the community from 2021 and 2022 ESSN fisheries combined must be at least \$10,000. 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, excluding the disaster years of 2018 and 2020.

Disaster funds for communities are proposed to be distributed **pro rata** to each community's demonstrated loss relative to the total loss of all eligible communities. Based on the criteria, three municipalities and one borough may be eligible for community-designated funds: City of Homer, City of Kenai, City of Soldotna, and the Kenai Peninsula Borough based on landings in Kasilof and Ninilchik.

Harvesters – 67% (~\$3,848,158): This category includes permit holders and crew. The total estimated loss in gross revenue for the 2023 ESSN fishery disasters is ~\$7.23 million dollars. Funds allocated to the harvesting sector are intended to mitigate this loss by providing funds to bring the harvesting sector up to 53% of the sector's recent historical value.

ADF&G proposes direct payments to commercial fishery permit holders and crew who meet all eligibility criteria. Commercial Fisheries Entry Commission (CFEC) permit renewal information is proposed to be used to determine eligibility for permit holders. Eligibility for crew will be verified using ADF&G commercial crew license or CFEC permit data and an affidavit from the permit holder. An affidavit form will be provided by PSMFC in the application materials.

ADF&G proposes to divide the harvester allocation into two pools, one for S04H permit holders (90%) and one for crew members (10%). ADF&G does not propose increasing the allocation to crew. Compared to the previous fishery disasters, fewer crew are expected to be eligible for 2023 disaster funds due to the preseason closure announcement which prompted many permit holders to not hire crew for the 2023 season. 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.

ESSN Permit Holders – 90%

ADF&G recommends including purchase of a 2022 or 2023 Upper Subdistrict buoy sticker as an eligibility criteria due to the preseason closure that was announced on March 9, 2023, and need to distinguish between S04H permit holders who participate in the ESSN fishery from those who participate in other set gillnet fisheries in Cook Inlet.

Proposed eligibility criterion for permit holders:

- Individual must have held a valid S04H CFEC permit in 2023. A permit is considered valid if fees were paid to the CFEC to renew the permit, regardless of the post-season fee waiver issued by CFEC due to the season closure.
- Individual must have purchased an Upper Subdistrict buoy sticker for their permit in either 2022 or 2023 as demonstrated by ADF&G Division of Commercial Fisheries records.

Funds are proposed to be paid to the person listed as the 2023 'Permit holder' and temporary emergency transfer permit holders (transferees) in the CFEC database. Permit holders who certified they were unable to participate to qualify for an emergency transfer and permit holders who permanently transferred a permit away before registering and purchasing a buoy sticker will not receive payment.

Each permit holder who meets the eligibility criterion is proposed to receive an equal payment for each eligible permit. ADF&G estimates a total of 363 permits held by 279 permit holders may be eligible for an equal payment.

ESSN crew – 10%: ADF&G proposes **equal payments** to ESSN gillnet crew meeting all criteria, not to exceed \$1,500. Unused crew funds should be redistributed to permit holders.

Proposed ESSN crew eligibility criteria:

1. Crew member must have held an annual 2022 or 2023 commercial crew license or a 2022 or 2023 CFEC permit for any fishery. This information will be verified using the ADF&G Licensing database and the CFEC permit database. Crew members with 7-day commercial crew licenses are not eligible.
2. Crew member must provide information to show they were the intended fishing crew for a qualified 2023 S04H permit holder, based on an affidavit signed by the permit holder.
3. Anyone qualified for disaster funds as a 2023 ESSN permit holder or transferee cannot qualify as crew.

Processors – 25% (~\$1,435,880): ADF&G proposes direct payments to processing companies. Processing permit holders that are required by 5 AAC 39.30 and 50 CFR 679 to complete and submit the COAR and who meet the eligibility criterion are eligible for direct payment. COAR buying data are used to determine eligibility and payment for processors because those data are linked to the location of salmon harvest, and the scope of this fishery disaster includes the ESSN salmon fisheries. Final exvessel price from the COAR buying data are used to determine processor losses.

Processing companies are identified based on the nine-digit federal tax identification number. A processing company may hold more than one processing permit and companies with more than one identification number will be consolidated based on company name and address. Disaster payments to processing companies are proportional to each company's demonstrated loss relative to the total loss of all eligible processing companies.

ADF&G proposes using the same eligibility criteria that was used for the 2021/2022 ESSN fishery disaster due to the complete closure of the 2023 ESSN fishery.

Proposed eligibility for processors:

1. Processing company must have purchased ESSN sockeye salmon in 2021 and/or 2022.
2. Processing company must have a demonstrated loss in final exvessel value for sockeye salmon purchased by the company from the 2021 and 2022 ESSN fisheries. The estimated loss in value is calculated by subtracting the final exvessel value of sockeye salmon in 2021 and 2022 from the average in 2014 through 2017 and 2019 excluding years with no value.

Disaster payments are proposed to be **pro rata** to each company's demonstrated loss relative to the total loss of all eligible processing companies. Based on the criteria, a total of seven processing companies may be eligible for processor funds.

Program Support – 0.1% (\$6,500): ADF&G proposes allocating funds for staff working on fishery disaster plan development and implementation in coordination with Pacific States Marine Fisheries Commission.

Appendix I. Public comments received on the initial draft spend plan.

Subject: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
2023 spend plan
Date: Thursday, August 13, 2026 9:20:27 AM

I would like to comment on the 2023 draft spend plan for upper Cook Inlet.

- All money should be split equally among qualified permit holders.
- I do not agree with any crew shares for the year 2023. We were told by the commissioner prior to opening we would not fish. There was no reason to hire crew.
- Every disaster adf&g takes a percentage of said money and have not produced any studies or helped with finding a solution. They should not get 10%. If anything, it should be covering administrative cost to oversee the spend plan only.
- Processors should be reduced to 15%. They have been able to increase the amount of fish bought through the drift fleet.
- Eligibility should be based on renewing permits cards through CFEC. They ask if you intend to fish. And that should be enough.
- I am not opposed to including 3% for KPFA as they are the ones who do the work for the disaster declarations.

Thank you,
Tanya Doner

From:
To: [DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: 2023 Draft Spend Plan Comments
Date: Thursday, August 13, 2026 9:32:06 AM

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> I would like to comment on the 2023 draft spend plan for upper Cook Inlet.

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> • All money should be split equally among qualified permit holders.

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> • I do not agree with any crew shares for the year 2023. We were told by the commissioner prior to opening we would not fish. There was no reason to hire crew.

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> • Every disaster adf&g takes a percentage of said money and have not produced any studies or helped with finding a solution. They should not get 10%. If anything, it should be covering administrative cost to oversee the spend plan only.

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> • Eligibility should be based on renewing permits cards through CFEC. They ask if you intend to fish. And that should be enough.

>

> • I am not opposed to including 3% for KPFA as they are the ones who do the work for the disaster declarations.

Thank you,
Timothy Doner
SO4H ESSN permit holder

RUSSELL CLARK
[REDACTED]**TO:** ADF&G; Federal Fisheries Disasters Team**ATTENTION:** Darion Jones, Disaster Relief Coordinator | Karla Bush, Extended Jurisdiction Program Manager**METHOD:** Email: dfg.com.fisheriesdisasters@alaska.gov | CC: Karla Bush**DEADLINE:** August 14, 2026**RE: Written Comments on 2023 Upper Cook Inlet East Side Set Gillnet Salmon Fishery Disaster Relief Initial Draft Spend Plan**

Dear Ms. Bush and Mr. Jones:

I submit these comments on the 2023 UCI ESSN salmon fishery disaster initial draft spend plan as holder of [REDACTED] and as a party with an active lawsuit pending in the Third Judicial District at Anchorage. These comments supplement my prior written comments filed June 26, 2026 and July 13, 2026 in this proceeding.

1. KPFA ORGANIZATIONAL ALLOCATION REQUEST MUST BE DENIED

KPFA submitted a written comment on July 13, 2026 requesting that 5 percent of the \$5.8 million disaster relief allocation, totaling approximately \$290,000, be directed to KPFA for organizational operating expenses. This request must be denied.

- Federal fishery disaster relief funds are not authorized for distribution to advocacy organizations for operational expenses.
- KPFA's IRS 501(c)(6) nonprofit status was revoked in 2023, confirmed through apps.irs.gov. KPFA's July 13, 2026 comment falsely represented KPFA as a valid 501(c)(6) organization in a federal proceeding.
- At KPFA's August 1, 2026 Annual Meeting a board member confirmed the funds were sought for organizational legal costs, not permit holders. President Hall confirmed KPFA was directly responsible for all disaster relief requests to the Governor.
- The KPFA 2026 Annual Meeting printed agenda sheet contained two QR codes soliciting dues via PayPal and the KPFA website, which represents KPFA as a valid nonprofit 501(c). KPFA is soliciting dues under a false nonprofit status representation.
- I have filed a formal complaint with the NOAA OIG. I request ADF&G; and PSMFC coordinate with NOAA OIG before finalizing any spend plan that includes an organizational allocation for KPFA.

2. KPFA BOARD PROCESS DID NOT REPRESENT THE MEMBERSHIP

The KPFA board held a closed meeting without notifying or consulting the membership to develop its disaster relief recommendations. Multiple members confirmed at the August 1, 2026 annual meeting they received no notice of the spend plan meeting. Secretary Sarah Hudkins confirmed she received Clark's notification requests and did not act on them. President Hall stated the board develops positions without member input. KPFA's

comment does not represent the ESSN permit holder community.

3. CREW SHARES MUST BE INCLUDED ON AN EQUAL BASIS

My crew held commercial crew licenses in 2023 and suffered real economic losses from the preseason closure. The precedent established in the 2018 and 2020 spend plans included crew shares. The 2023 spend plan should maintain that precedent. The buoy sticker eligibility requirement should be waived given the preseason closure announced March 9, 2023.

4. EQUAL DISTRIBUTION PER PERMIT

All qualified permit holders should receive an equal share per permit. No permit holder should receive a lesser allocation based on geographic location, shore lease status, or any other characteristic.

Respectfully submitted,

/s/ Russell Clark

Russell Clark

[REDACTED]
Date: August 03, 2026

To: ADF&G Federal Fisheries Disaster Team
Re: 2023 UCI ESSN salmon grant award / Comments on
Spend plan (second round)
Attn: Karla Bush, extended jurisdiction program manager
Attn: Darion Jones ADF&G disaster relief coordinator

Date: August 5, 2026

To whom it may concern:

I provided comment on first round on on the 2023 UCI ESSN salmon spend plan. After review of the first round draft spend plan outline and stakeholders comments I offer to further my comments.

1/ Fishermen/owner operators/permit holders and crew are still awaiting for distribution of the 2021/2022 ESSN salmon fishery Disaster relief funds to be distributed. It's been 2 years since that spend plan was completed and approved. Of note: "On June 21,2024 NOAA allocated \$11,496,171 to the Alaska Department of Fish and Game." It is incumbent that PSMFC and ADF&G update its records and be responsible for the distribution of these fore mentioned funds ASAP to the stakeholders harmed.

The 2021/2022 disaster funds needs to released before the 2023 disaster fund applications are available through NOAA/PSMFC.

2/ I agree that permit holders eligible for 2023 funds as outlined in the first draft spend plan.

3/ I agree with Crew members eligibility stated in the first draft spend plan but they should receive 12.5% of the allocated amount instead of 10%. 2023 is different than 2021/2022 disaster years. The 2.5% should be offset from the processor amount.

4/ i disagree on the 25% processor allocation amount - it should be reduced to 15%. They processed 1.6 million sockeye salmon from the Drift fleet which was given extra time and area and was completely different from the 2021/2022 disaster years and spend plan.

5/ I completely disagree that ADFG research receive 10% of 2023 fishery disaster funds. It should be 0 - 5% only. They will receive \$1,125,000 from the 2021/2022 funds - more than enough funds to do research projects on Kenai late-run king salmon. An additional \$569,000 dollars for 2023 for research is not a necessity, especially when compared to the ESSN fishery losses.

In 2023 ADFG put 2,351,000 Kenai late-run sockeye salmon past the sonar. This gross mismanagement put 1,426,000 fish above the midpoint of the SEG range which are designated as commercially available fish to be harvested. In the Kasilof River 939,000 passed sonar - a gross over escapement event. Nearly 700,000 sockeye salmon above the established midpoint BEG goal range designated as commercially available preseason. These estimates do not include the reallocation of sockeye salmon numbers to the ever expanding personal use dip net fisheries (well above 600,000 fish),

ADFG established a large king only goal range instead of all size king goal in place for decades on the Kenai river. By going to large fish goal only - ADFG violated its own escapement goal Policy and regulatory framework for salmon stocks. A stock encompass all all classes and sizes.

And by doing so doubled the former all fish goal (15,000-30,000) by retaining that same goal to apply to only large fish. Smaller size kings make up 40-60% of the run. This change ensured the ESSN closures (fishery disasters). Besides it is well known kings are returning at earlier ages (shift in ages in spawning escapements statewide).

Research funds should be dedicated to sonar independent review on the Kenai. Stock assessment independent review. Also independent scientific review of the escapement goal.

6/ I adamantly oppose any funds going to KPFA. Recently it came out that KPFA no longer holds a 501 (c) (6) non profit status and was Revoked since 5/15/2023. Their membership is primarily in the Kenai section of Cook Inlet and no longer represents ESSN fishermen as a whole in the Kasilof section.

Their comments on alternate gear suggests a continuation of placing seine gear into regulations even though CFEC states it is non-legal gear.

I furthermore caution the Disaster Team to *advance any recommendations from KPFA after its misrepresentation of non profit organization status.*

Sincerely,
Jeff Beaudoin
ESSN stakeholder/owner/operator
SO4H permit holder
Kasilof, Alaska

To: ADF&G Federal Fisheries Disaster Team

Re: 2023 ESSN Salmon Disaster

Date: August 10, 2026

To Whom It May Concern,

The 2021/2022 Disaster funds needs to be sent out as soon possible; preferably before the end of the year. This should be explicitly stated in the 2023 Spend Plan.

A/ Who came up with the \$5.8 million amount and what kind of metrics were used for only \$5.8 million disaster amount?

Through August 15, 2023 1,926,850 Kenai late-run sockeye salmon were counted – that's approximately 926,350 above the upper end of the escapement goal. On the Kasilof River 865,538 sockeye salmon passed the sonar – that's 486,574 sockeye above the upper BEG escapement goal. And another 300,000 reallocated to the personal use dip net fisheries. All total that's 1,652,112 sockeye salmon that should have been available to the ESSN fishery in 2023. That's over 9,000,000 lbs. of fish with an ex-vessel value of over \$20,000,000 Dollars!

B/ Processor amount should be attached to Buying stations along the eastside that couldn't operate. Contractual arrangements with property owners should be compensated for their losses. The 25 percent allocation should be reduced to 15 percent accordingly (buying stations).

C/ ADFG Research amount of 10% should not happen Until there is a complete outside independent scientific review of the Kenai late-run Chinook sonar program. This should have been done years ago.

D/ KPFA shouldn't get one dime. I don't consider them eligible for disaster funds at all.

Regards,

Mark Ducker
Suzanne Ducker
S04H permit holders
ESSN owner/operators

From:
To: [Bush, Karla L \(DFG\); DFG, ComFisheriesDisasters \(DFG sponsored\)](#)
Subject: 2023 Initial UCI Fisheries Disaster Spend Plan Comments
Date: Friday, August 14, 2026 10:07:36 PM

Dear Karla Bush,

On behalf of the Executive Board of the Kenai Peninsula Fishermen's Association (KPFA), thank you for the opportunity to provide additional comments regarding the initial distribution plan of the 2023 NOAA Fisheries Disaster Relief Funds allocated to the Upper Cook Inlet fishery.

The Kenai Peninsula Fishermen's Association is a nonprofit 501(c)(6) commercial fisheries trade association that has represented Cook Inlet fishing families since 1954. Our mission is **"Ensuring the Sustainability of Our Fishery Resources."** We are committed to strengthening our fishing community while promoting the long-term economic stability of the Cook Inlet East Side Setnet (ESSN) fishery.

KPFA primarily represents salmon setnet permit holders fishing along the east side of Cook Inlet, from Ninilchik to Boulder Point—a coastline spanning more than 60 miles. Salmon harvested in this fishery originate primarily from the Kenai and Kasilof River systems. Approximately 440 limited entry permit holders participate in this fishery. These permit holders are small business owners, approximately 86% are Alaska residents, and about 80% reside on the Central Kenai Peninsula.

The KPFA Executive Board has reached the following consensus recommendations regarding the initial distribution plan of the \$5.8 million in 2023 NOAA Fisheries Disaster Relief funding.

Distribution Between Permit Holders and Crew

KPFA continues to recommend that disaster funds designated for harvesters be distributed as follows:

- 90% to qualified permit holders
- Flat payment of \$1,500 per qualified crew member

This distribution recognizes both the capital investment and financial risk assumed by permit holders while acknowledging the economic hardship experienced by crew members who depend on the fishery for seasonal employment. We continue to support this distribution plan.

Permit Holder Eligibility

The 2023 season was unprecedented. For the first time during the recent series of fishery disasters, the ESSN fishery began the season closed because the preseason forecast for large Kenai River king salmon was below the lower bound of the escapement goal. In March 2023, the Alaska Department of Fish and Game announced that the fishery would remain closed until projections indicated escapement goals could be

achieved.

As a result, many permit holders reasonably chose not to purchase buoy stickers because there was little expectation that fishing opportunities would occur. Ultimately, the fishery remained closed for the season.

Because buoy sticker purchases have historically been used to demonstrate intent to fish, applying that requirement to 2023 would unfairly exclude many active participants who fully intended to fish but were prevented from doing so by the preseason closure.

Accordingly, KPFA continues to recommend that eligibility for permit holders be based upon:

- Holding a valid East Side Setnet limited entry permit in 2023;
- Renewing the permit for the 2023 season; and
- Demonstrating intent to fish through the purchase of 2022 buoy stickers for statistical areas 244-21, 244-22, 244-31, 244-32, 244-41, or 244-42.

Using the 2022 season as the qualifier more accurately reflects active participation in the fishery and avoids penalizing fishermen for management actions entirely outside their control.

Crew Member Eligibility

Many crew members also suffered substantial economic losses during the 2023 disaster.

Some crew members purchased commercial fishing licenses despite the uncertainty surrounding the season, while others delayed purchasing licenses because resident licenses (\$60) and nonresident licenses (\$220) represented a significant expense without any assurance of being able to fish.

KPFA continues to recommend that crew members qualify by either:

- Purchasing a 2023 commercial fishing crew license; or
- Providing an affidavit from the permit holder confirming that they were the intended crew for the 2023 season.

KPFA continues to recommend a flat payment of \$1,500 for each qualified crew member.

Support for Industry Organizations

KPFA also requests reconsideration for receiving a modest administrative portion of the disaster relief funding.

For more than sixty years, KPFA has represented the interests of East Side Setnet fishermen and has been at the forefront of disaster relief efforts on behalf of fishermen, processors, fishing communities, and fisheries research. Since 2018, KPFA has been the primary organization requesting and supporting federal fisheries disaster declarations for the East Side Setnet fishery, including disasters for 2018, 2020, 2021, 2022, 2023, 2024, and 2025. Throughout this period, KPFA's Board of Directors has performed this work entirely on a 100% volunteer basis, contributing thousands of hours advocating for fishermen, coordinating with local, state, and federal agencies, participating in

regulatory and public processes, and developing recommendations for disaster relief distributions.

Like the fishermen it represents, KPFA has also suffered financial losses resulting from repeated fishery disasters. Annual membership dues and voluntary contributions from fishermen are the Association's primary source of revenue and fund the organization's operating expenses, including insurance, communications, meeting expenses, legal and administrative costs, and other essential business obligations. As fishing opportunities and fishermen's incomes have declined, so too has the Association's ability to generate the revenue necessary to pay its bills while continuing to represent the fleet.

Supporting the industry's representative organization through a modest administrative allocation recognizes both the documented financial losses incurred by KPFA and the extraordinary volunteer effort required to secure disaster assistance and advocate for the East Side Setnet fishery. Such funding will help ensure that KPFA can continue serving as the recognized voice of the fleet during future disaster declarations, recovery efforts, and fisheries management processes.

An assessment for each of the approximately 440 qualified permits who regularly fish on the Eastside of Upper Cook Inlet and will benefit from this disaster distribution could be a consideration for our organization, potentially the equivalent of our annual membership fee of \$150.00 per permit.

Research Funding

If a portion of the disaster funds is allocated to the Alaska Department of Fish and Game for research, KPFA requests that:

- Research funding be directed toward projects that directly benefit the fisheries affected by the disaster;
- KPFA be provided meaningful stakeholder input regarding the selection and implementation of research projects funded through the 2023 disaster allocation;
- Research expenditures remain focused on restoring fishing opportunities and preventing similar fishery disasters in the future-such as the formation of a fisherman involved alternative gear working group.

KPFA continues to request that any research funding expended by the Department from the 2023 disaster allocation be transparent and directly tied to projects that provide measurable benefits to the affected Eastside setnet fishery and fishing communities.

Alternative Gear Reimbursement

KPFA continues to support research funding including reimbursement opportunities for fishermen who invest in conservation-oriented alternative gear.

ESSN fishermen have repeatedly been required to modify gear for conservation purposes, including reducing mesh size from 45 meshes to 29 meshes, without compensation. As new alternative gear types become available and are authorized for use, fishermen should not bear the entire financial burden of conservation-related innovation.

As previous disaster spending plans have recognized:

"A portion of these funds will be allocated to research activities that promote restoration

of the fishery or prevent a similar failure in the future, while also assisting the fishing communities affected by the disaster by recognizing the loss of income."

Consistent with that purpose, KPFA recommends establishing a non-competitive gear reimbursement program to assist fishermen with the purchase or modification of approved alternative gear intended to improve conservation while maintaining fishing opportunity.

Thank you for considering and including the recommendations of the Kenai Peninsula Fishermen's Association in the initial spend plan for the 2023 UCI Fisheries Disaster. We appreciate the Department's work in administering these disaster relief funds and look forward to continuing to work collaboratively toward the recovery and long-term sustainability of the Upper Cook Inlet fishery.

Sincerely,

Dan Norman

President

Kenai Peninsula Fishermen's Association

Lisa Gabriel

Secretary & Project Lead

Kenai Peninsula Fishermen's Association