



UNITED FISHERMEN OF ALASKA

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National Oceanic and Atmospheric Administration
Chris Oliver, Assistant Administrator
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Oliver,

The United Fisherman of Alaska (UFA) is grateful for the Section 12005 Cares Act Relief Funds for Fisheries and we appreciate the role NOAA played in moving the funds to appropriate agencies for distribution. We are currently working with the State of Alaska to arrive at an equitable spend plan for our fisheries. Through the process of reviewing the NOAA and State guidelines, we identified several issues that we recommend be addressed in any future Covid relief funding for fishermen. These relief funds are important to our industry as we weather the pandemic, and we believe our suggested changes will make any future rounds of funding more equitable.

First, the amount of Cares Act funding allocated to fisheries did not come close to compensating Alaska's fishermen for Covid related value reductions and operational expenses. UFA believes this to be true for fishermen throughout the United States. As additional Cares Act relief funding for fisheries is considered, UFA encourages NOAA to provide Congress with accurate value assessments of Covid related impacts to America's fisheries. We suspect Covid related impacts to America's fisheries already totals billions of dollars.

Second, the amount of Cares Act fisheries funding allocated to the State of Alaska was fundamentally inequitable because it was not proportional to the size and value of Alaska's fisheries (state and adjacent federal commercial fisheries, processors and catcher-processors, aquaculture, and sport fish charter sectors) as compared to other states. Covid related commercial fisheries impacts are directly tied to changes in ex-vessel value, wholesale and retail market loss and increased operational expenses in the industry. Alaska fishermen catch 32% of America's fish by value and 58% of America's fish by landings¹. Equitable compensation for fisheries related Covid losses should reflect the value of the respective State's fisheries. The first Cares Act funding for fisheries resulted in Alaska and Washington receiving the same allocation, even though Alaska's ex-vessel landings are five times greater than Washington's ex-vessel landings. These inequities should be evened out with the next round of Cares Act funding.

Cares Act compensation should treat equally harmed fishermen similarly. Covid related impacts did not start and stop at a State boundary. Future Cares Act funds should be

¹ [Fisheries of the United States 2018; Current Fishery Statistics No. 2018](#)

structured and allocated so that similarly situated fishermen are compensated the same without regard to where they reside.

Also, UFA believes the following classes of claims should be addressed in any future Cares Act compensation to America's fisheries:

- Provide funding for crewmembers.
 - Either create another sector or provide adequate funding under the commercial harvesters' sector to allow for meaningful compensation to crew.
- Create alternative damage claims assessments for new fishermen—i.e., those who operated a boat/permit for the first or second time in 2020.
- Explicitly include funding for aquaculture and mariculture losses.
- Explicitly provide that harvesters, processors, tenders and catcher processors shall receive reimbursement for direct expenses incurred as a result of Covid.

In summary, UFA believes that the agency should communicate with Congress regarding an accurate assessment of the magnitude of Covid related impacts on America's fisheries. Compensation for these impacts should, for the most part, be proportional to the fisheries' ex-vessel value and processors/catcher-processors revenues. Similarly situated fishermen and processors should receive similar compensation without differentiation based on residency. All Covid related expenses should be considered eligible to receive reimbursement. Finally, crewmembers, tendermen and new entrants should be fairly included in the distribution plan.

Thank you for considering our comments. We hope these are incorporated into NOAA guidelines for any future Covid relief funds to fishermen.

Sincerely,



Matt Alward
President



Frances H. Leach
Executive Director

UFA works to promote and protect the common interest of Alaska's commercial fishing industry, as a vital component of Alaska's social and economic well-being.