



ALASKA SALMON ALLIANCE
110 N. Willow St. #108 - P.O. Box 586
Kenai, AK 99611
www.aksalmonalliance.org
Email: info@aksalmonalliance.org

April 1, 2021

Simon Kinneen, Chair
North Pacific Fishery Management Council

RE: April 2021 NPFMC meeting agenda; B3 Cook Inlet

Chairman Kinneen,

We are submitting these comments regarding item B3 Cook Inlet reference point letter on your April 2021 meeting agenda.

By way of background, the Alaska Salmon Alliance is an organization comprised predominantly of Cook Inlet seafood processors, focused on public education, promoting the value of scientifically based salmon management to preserve habitats and create predictable harvests for all salmon users in the Cook Inlet region. Alaska Salmon Alliance promotes long-term sustainability and is a source for accurate information about the salmon industry. The Alaska Salmon Alliance advocates for the salmon economy, for a thoughtful, process-oriented allocation of Cook Inlet salmon for the benefit of all Alaskans.

In December of 2020, the North Pacific Fisheries Management Council took action to close the EEZ portion of Cook Inlet, supporting a motion made by the Alaska Department of Fish and Game. The record is very clear that the action described as Alternative 4 was put forward as a new alternative at the October 2020 meeting after the close of public testimony. This came after several years of good faith efforts, and many committee meetings with stakeholders, to reach resolution on a court ordered mandate to show compliance consistent with the MSA for Cook Inlet's salmon harvest. The record is also very clear that every local municipal government and stakeholder with harvest interest in the EEZ objected to this action.

We assert the following with regard to the December 2020 meeting and action:

- The process was flawed, a new alternative was introduced at the last possible moment and did not allow enough time for a thorough review;

- Simply closing the EEZ at the refusal of the State to accept management delegation is not consistent with numerous provisions of the MSA;
- The council did not adequately consider testimony from processors and harvesters that closing the EEZ will not allow for the orderly, economically viable harvest of Cook Inlet salmon solely in State waters. No analysis was conducted to evaluate this testimony.

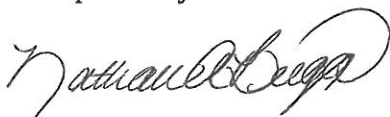
We are confident it is still the duty of the NPFMC to set guideline harvest levels for all salmon stocks consistent with the MSA. The letter dated 3/25/21 from the NMFS Alaska Regional Administrator acknowledges the details of this task were unclear.

We, along with many others who participate in the Upper Cook Inlet salmon fishery, know the State's method of setting escapement goals as either biological escapement goals (BEG), or sustainable escapement goals (SEG), is NOT the same as setting goals based on MSY. This practice is not consistently applied across the State of Alaska and needs review. Continuing to delegate this duty solely to the State in the present form and application is unacceptable. Of more concern, such an approach will lead to unpredictable salmon returns and diminished harvest levels as has been the recent case in Cook Inlet.

Remedy – The Council should rescind the action to close the EEZ in Cook Inlet. NMFS and the Council should establish a mechanism to review salmon escapement goal protocols in the context of MSY.

Thank you for considering our comments. As previously mentioned, the Alaska Salmon Alliance is an industry trade association for Cook Inlet commercial salmon processors, harvesters and supporting industry. We are confident that by focusing on the proven tenets of the MSA, there can be a bright future for all who participate in the various sectors of the salmon fishery in Cook Inlet.

Respectfully submitted.



Nate Berga, President
Alaska Salmon Alliance.