

COOK INLET FISHERMAN'S FUND

Non-Profit Advocate for all Commercial Gear Types in Area H
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Date: April 2, 2021

Addressee: Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

RE: Agenda Item B3

Dear Mr. Kinneen,

Cook Inlet Fisherman's Fund (CIFF) membership includes drift gillnet and set gillnet fishermen, members of the general public and federal subsistence participants. CIFF's mission is to advocate on behalf of all commercial fishermen of Cook Inlet and for the coastal community more generally. CIFF's members and volunteers are fueled by the desire to save the commercial fishing industry in Cook Inlet as well as all of Alaska, and to protect the habitat and ecosystems on which those species depend.

As pointed out over 150 times in the written and oral testimony concerning Amendment 14, Salmon Fishery Management Plan, will cause the economic collapse of the Cook Inlet commercial fishing industry. The Magnuson-Stevens Act purposes are to provide food, food security, interstate commerce and recreational opportunity. Under State of Alaska management policies, plans and management practices, many areas in Alaska are regularly experiencing economic disasters. These economic disasters are not the result of water pollution, sudden storms or other unexpected natural disasters. In the last decade, the management, or avoidance of management, and mismanagement are directly related to the State of Alaska.

The economic health of coastal communities, National Standards 7 & 8, are at risk. Many coastal harvesters along with city, borough and state treasuries face huge deficits. These deficits result in difficulty providing education, health care, public safety, food inspection and transportation services. All of these economic challenges can, in part, be resolved if the State of Alaska and NMFS were to manage fisheries, including salmon stocks, to MSY/OY and the 10 National Standards.

For your information, a copy of the letter from the Governor of the State of Alaska to the Secretary of Commerce, Gina Riamondo, containing Federal Fishery Disaster requests are attached.

At the December 7-12, 2020 NPFMC meeting, Alternative 4 was selected as the preferred alternative. During the deliberations, several comments were made that simply are not true and were legally insufficient.

First, the assertion that the salmon that are historically harvested in the EEZ can be harvested in 'state waters' is pure fiction. No harvest analysis supports these fictional statements. Nothing in the last 80-year history of this fishery supports such a statement. The management plans and harvest record supports the exact opposite. When harvests are restricted from the EEZ, escapement goals and MSY/OY are not achieved. Interstate commerce suffers and economic performance of the fishery is severely depressed. Large overescapements of 500,000 to 1.5 million sockeye, chums and coho occur which leads to a decline in future returns.

Secondly, by closing the EEZ, numerous salmon stocks will no longer be able to achieve MSA objectives or adhere to any of the National Standards.

Thirdly, there is no scientific basis for Alternative 4. The Council has no stock status determination(s) to support Alternative 4. Further, this issue of stock status has been raised directly to the Council, the State of Alaska and NMFS for the last five years. During this time, there has been little to no effort to develop stock status determination. The Council had no information as to the effects on the hundreds of salmon stocks that were to be impacted by Alternative 4. The Council had no data on Chinook, Sockeye, Coho, Chum or Pink salmon stocks.

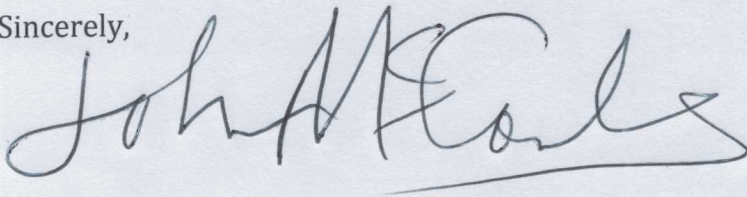
Fourth, the Council utilized no information on salmon stock abundance, temporal or spatial distributions, effects on MSY/OY management, setting of escapement goals, Annual Catch Limits (ACLs), Guideline Harvest Levels (GHLs), annual total removals or appropriate management measures when Alternative 4 was put forward as the preferred Alternative. It is highly speculative that a meaningful SAFE Report will occur.

National Standard 8. Measures shall, consistent with the conservation requirements of the Act take into account the importance of fishery resources to fishing communities in order to

- (a) provide for the sustained participation of such communities, and
- (b) minimize adverse economic impacts on such communities

The character of coastal communities must be preserved. CIFF remains willing to work with the Council, State and NMFS to achieve a positive Amendment 14.

Sincerely,

A handwritten signature in black ink, appearing to read "John McCombs", written in a cursive style. The signature is positioned below the word "Sincerely," and above the typed name.

John McCombs
CIFF President

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P.O. Box 110001
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Governor Mike Dunleavy
STATE OF ALASKA

March 8, 2021

The Honorable Gina Raimondo
Secretary
United States Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

Re: State of Alaska Federal Fishery Disaster Requests

Dear Ms. Raimondo:

In accordance with Section 312(a) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), and Section 308(b) of the Interjurisdictional Fisheries Act (IFA), I am writing to request you declare a fishery disaster for each of the following fisheries: the 2020 Norton Sound, Yukon River, Kuskokwim River, Chignik, Upper Cook Inlet, Prince William Sound and Southeast Alaska salmon fisheries, 2018 and 2020 Copper River salmon fisheries, 2018 Upper Cook Inlet East Side Setnet salmon fishery, 2020 Gulf of Alaska Pacific cod fishery, and the 2019/2020 Bering Sea Tanner crab fishery.

These fisheries have experienced drastic declines resulting from unprecedented conditions in recent years.

The 2014-2016 marine heatwave was substantially long lasting and intense. The Secretary of Commerce determined that the 2018 Gulf of Alaska Pacific cod and 2018 Chignik sockeye salmon commercial fishery failures resulted from "unfavorable ocean conditions, among other factors, beyond the control of fishery managers that reduced biomass and access to the fishery."

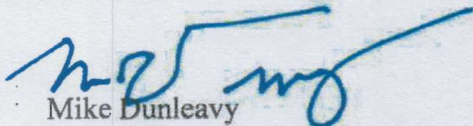
In 2018 and 2019, a subsequent marine heatwave occurred in the Gulf of Alaska and the Bering Sea, extending throughout the entire water column. These marine heatwaves likely contributed to continued low abundance and poor marine survival of salmon and Pacific cod in the Gulf of Alaska and northern Bering Sea. Environmental impacts likely play a role in the distribution, growth rate, and natural mortality of Tanner crab as well.

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The sudden and unexpected decreases in commercial fishery stock biomass have resulted in several fishery closures and severely restricted fisheries. This has negatively affected permit holders, fishing crew, processors, and communities from Norton Sound to Southeast Alaska. Based on available information, to be provided, the commercial fishery failures across multiple species and regions of Alaska included in this request resulted from fishery resource disasters arising from natural or undetermined causes; therefore, they meet the criteria for fishery disaster determinations under the MSA and IFA.

I appreciate your consideration of these requests, and have asked the Alaska Department of Fish and Game to provide the National Marine Fisheries Service and your office with any additional information needed to make fishery disaster determinations.

Sincerely,



Mike Dunleavy
Governor

cc: The Honorable Lisa Murkowski, United States Senate
The Honorable Dan Sullivan, United States Senate
The Honorable Don Young, United States House of Representatives
The Honorable Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game
Kip Knudson, Director of State/Federal Relations, Office of the Governor
John Moller, Policy Advisor, Office of the Governor