



## United Cook Inlet Drift Association

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April 2, 2021

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

Dear Chairman Kinneen,

We are writing in reference to Agenda Item B 3 Cook Inlet reference point letter to the Council.

The letter makes it very clear that a recommendation to close a portion of a fishery does not end your responsibility. Closing the Cook Inlet EEZ does not exempt the Council from having to meet the requirements of the MSA in the rest of the fishery. Closing the EEZ does, however, make it impossible to achieve MSY and OY and other MSA requirements in the Cook Inlet salmon fishery.

Salmon management practices and salmon escapement goals developed by the State of Alaska for the Cook Inlet salmon fishery do not meet the requirements of federal law. The Council and the SSC must conduct a thorough review of the State's methodology for setting escapement goals. The Magnuson-Stevens Act (MSA) and National Standard 1 requires achieving optimum yield (OY) from each fishery, establishes maximum sustainable yield (MSY) as the basis for fishery management and requires that fishing mortality does not jeopardize the capacity of a fishery to produce MSY. Given that salmon populations exhibit compensatory and density dependent stock recruitment dynamics, achieving OY on a continuing basis for salmon stocks requires that salmon escapement goal ranges be set near MSY, typically at 90%. MSY and OY are only achieved when MSY-centered escapement goals are established, and the fishery is managed for escapements that stay within that escapement goal range and distribute escapements within that range to achieve MSY as an average. MSY or OY cannot be achieved if either underfishing or overfishing occurs repeatedly.

The lost harvest from the EEZ closure cannot be made up in a State water fishery. As the 260 commenters made clear at your December 2020 meeting, an EEZ closure would eliminate the economic viability of the Cook Inlet drift fleet. The loss of the drift fleet harvest would also eliminate the possibility of achieving the harvest rates necessary to stay within the escapement goal range that would produce MSY for the sockeye, coho, chum and pink salmon stocks in Cook Inlet.

The Council cannot close the Cook Inlet EEZ and meet the requirements of the MSA in the rest of the Cook Inlet salmon fishery, these actions are mutually exclusive.

Sincerely,

Erik Huebsch  
UCIDA Vice President