



PO Box 586, Kenai, AK 99611
Arni Thomson, Consultant; cell: 907.907.570.1959
athomsonak@gmail.com www.aksalmonalliance.org

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Dan Hull, Chairman
Chris Oliver, Executive Director
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252
npfmc.comments@noaa.gov

Agenda B-2 UCIDA Ninth Circuit Court Decision:

These comments are being submitted on behalf of the Alaska Salmon Alliance, an Alaska licensed business with offices in Kenai and Anchorage. ASA is an IRS qualified 501(c)6, not-for-profit entity, EIN #45-3559869, certified in February 2012. ASA supports the culture of salmon in Alaska and advocates for research and education to improve science-based salmon management for the benefit of Alaskan communities and all user groups.

Background on the Alaska Salmon Alliance involvement in Alaska fisheries:

The ASA Board of Directors represents Kenai Peninsula-based seafood processors: Inlet Fish Producers; Icicle Seafoods; Pacific Star Seafoods; Snug Harbor Seafoods and Fishhawk. In addition, ASA represents Cook Inlet drift boat permit operators and numerous setnet fishing families that operate primarily in Cook Inlet salmon fisheries. ASA processors are major buyers in Prince William Sound and they also operate in Bristol Bay and the Kodiak area, buying not only salmon, but halibut, black cod and Pacific cod.

In June of 2015, ASA contracted with the McDowell Group who published an in-depth baseline analysis entitled, "The Economic Impact of the Seafood Industry in Southcentral Alaska," ASA previously contracted with Northern Economics, in 2013, to complete a first baseline study of the harvest values of Kenai Peninsula fisheries and the interplay between salmon, halibut and cod species harvests. Both reports are based on state and federal databases. These reports, and their executive summaries, are available at our website at www.aksalmonalliance.org.

The McDowell report provides an overall summary of the Southcentral Seafood Industry and then breaks it out into baseline community economic profiles for Anchorage and the MatSu Borough, Kenai and Soldotna, Homer, Seward, Cordova and Valdez.

The industry directly employed 10,840 people in Southcentral Alaska, including 7,660 regional residents, in 2013. Including multiplier effects, the seafood industry created an estimated 8,130 (FTE) jobs and \$411 million in annual labor income. Commercial seafood generated \$1.2 billion in total economic output in Southcentral Alaska in 2013. This includes \$685 million in first wholesale value of seafood products and \$501 million in value added through secondary impacts.

A total of 5,729 commercial fishermen live in Southcentral Alaska and participate in fisheries throughout the State. This is nearly a third (32 percent) of all Alaska resident commercial fishermen. Its 2,168 active permit holders, each of which are a small business, grossed \$308 million in 2013, accounting for 38 percent of all Alaska resident commercial income. The Anchorage/Mat-Su sector had 2,880 FTE jobs in the seafood industry with labor income of \$148 million and surprisingly, the City of Wasilla residents had commercial fishing revenue of \$20 million.

The Southcentral seafood processing sector employed an estimated 4,590 workers in 2013 and paid out \$61 million in wages. The workforce included 1,410 resident workers who earned \$20.3 million. The region contains 36 processing plants, including the new state-of-the-art Silver Bay Seafoods salmon plant that began operations in Valdez in the spring of 2016.

Salmon is the foundation of the region's seafood industry, accounting for 85 percent of the first wholesale value of seafood produced in Southcentral Alaska. When properly managed, the Upper Cook Inlet commercial salmon fishery is the fourth largest in the State. The Upper Cook Inlet salmon fishery could play an even more important role in the regional and state economies if the fishery were managed for MSY. State management plans in Cook Inlet now result in only about two percent of pink salmon stocks being harvested, about six percent of chum salmon stocks being harvested and about 10 percent of coho stocks being harvested. Surplus Chinook and sockeye are harvested at a higher rate but there is an unharvested surplus of all stocks that could generate additional tens of millions of dollars annually to the regional and state economies.

ASA also wishes to point out the intersection of Southcentral Alaska as a major driver in the Washington State and Puget Sound seafood and maritime industry. This is graphically illustrated in a companion study the McDowell Group also completed in 2015 : "Ties that Bind The Enduring Economic Impact of Alaska on the Puget Sound Region." The report was jointly sponsored by Washington and Alaskan-based companies operating in Alaska. One of the largest employers is seafood at 23,900 jobs, 21 percent of the total Alaska related jobs. Alaska-related economic activity in Puget Sound falls into two categories: export-related and natural resource-related. The report is available on the Seattle Chamber of Commerce website.

Recommendations for action on B-2 NMFS Reports, UCIDA Ninth Circuit Decision

It appears from the unanimous decision of the Ninth Circuit Court that the NPFMC, NMFS, ADFG and public stakeholders will soon initiate action to bring the Cook Inlet Salmon fisheries into compliance with Magnuson-Stevens Act and its Ten National Standards by developing a Cook Inlet salmon fisheries management plan (FMP) under the published guidelines of the National Marine Fisheries Service.

1. ASA recommends that the NPFMC develop a discussion paper based on NMFS website-based “NMFS and the Legal Framework for Federal Fisheries Management” (Moir Kelly, NER, 2013).
2. ASA further recommends that the NPFMC set up an industry stakeholder committee immediately following the October Council Meeting to be comprised of representatives of the concerned user groups and communities in the region that educates, explains process opportunities, collects information and identifies issues.

In conclusion, the ASA wishes to draw attention to an historic public letter of April 12, 2016, signed and published by James W. Balsiger, Alaska Regional Administrator for NOAA Fisheries, Chris Oliver, Executive Director of the NPFMC, Sam Cotten, Commissioner of the Alaska Department of Fish and Game and Doug DeMaster, Science Director of NOAA’s Alaska Fisheries Science Center. (Attachment) This letter heralds the successes of U.S. and Alaska fisheries management on the 40th Anniversary Year of the Magnuson-Stevens Fishery Management Act “ a law that took U.S. fisheries management in federal waters from being virtually non-existent to becoming a global model of sustainability”....“Nowhere is this truer than in Alaska, where our fisheries have an international reputation as being among the most sustainable and valuable fisheries on the planet, largely thanks to the collaborative and inclusive management process set up under the Magnuson-Stevens Act.”

Sincerely,

Arni Thomson
Alaska Salmon Alliance

Alaska is a Testament to 40 Years of Successful Fishery Management Under Magnuson

SEAFOODNEWS.COM [Alaska Dispatch News] Opinion by James W. Balsiger, Chris Oliver and Sam Cotten - April 12,



2016

*James W. Balsiger is Alaska regional administrator for NOAA Fisheries.
Chris Oliver is executive director of the North Pacific Fishery Management Council.
Sam Cotten is commissioner of the Alaska Department of Fish and Game.
Doug DeMaster is science director of NOAA's Alaska Fisheries Science Center.*

April 13, 2016, marks the 40th anniversary of the Magnuson-Stevens Fishery Conservation and Management Act, a law that took U.S. fisheries management in federal waters from being virtually non-existent to becoming a global model of sustainability.

Nowhere is this truer than in Alaska, where our fisheries have an international reputation as being among the most sustainable and valuable fisheries on the planet, largely thanks to the collaborative and inclusive management process set up under the Magnuson-Stevens Act. One of the MSA's authors, our very own Sen. Ted Stevens, had an extraordinary vision for our nation's fisheries, especially for those in his home state of Alaska. Many elements of the State of Alaska's fishery management are woven into the fabric of the MSA.

The results? Our state produces 60 percent of all seafood harvested from U.S. waters. The Alaska seafood industry is the number one private employer in the State of Alaska, contributing an estimated \$5.9 billion to the Alaska economy, and producing more than \$4.2 billion first wholesale value of wild, sustainable seafood annually. For nearly 20 consecutive years, Dutch Harbor has been the top U.S. fishing port in volume of seafood landed. In 2014, Alaska ports took the top three spots in the nation in volume of seafood

landed (Dutch Harbor, Kodiak, and Aleutian Islands). Other Alaska fishing ports -- Alaska Peninsula, Naknek, Sitka, Ketchikan, Cordova, and Petersburg -- ranked in our nation's top 20 ports by volume.

Over the past 40 years, the Magnuson-Stevens Act has proved its value to our nation's economy and ecosystems. Operating under Magnuson's robust rebuilding process -- largely patterned after long-standing practice in the North Pacific -- the occurrence of overfishing and status of overfished stocks in the U.S. are at historic lows. Only 16 percent of stocks were determined to be overfished in 2015. In Alaska, we have no stocks on the overfishing list. Only one species, the Pribilof Islands blue king crab, is categorized as overfished, with environmental factors largely to blame for the stock's decline and lack of recovery.

The investment in environmental stewardship implemented under MSA is paying off. In 2014, U.S. fishermen landed 9.5 billion pounds of fish and shellfish, worth \$5.4 billion. That year, Alaska led all states in both volume and value of landings: 5.7 billion pounds harvested, with an ex-vessel value of \$1.7 billion.

There are still steep challenges ahead, including climate change, bycatch reduction, and habitat protection. But the commitment to science-based ecosystem management and technological innovations that allow NOAA and our partners to assess fish stocks under MSA equip us to collaboratively and creatively address them.

Here in Alaska, the regional public-private management process founded under MSA includes NOAA Fisheries, the State of Alaska, North Pacific Fishery Management Council, the fishing industry, academia, Alaska Natives, and our many stakeholders. That transparent governing process ensures that regional councils across the nation have both the muscle and the capability to flex it. The proud result is that America's finite marine resources are responsibly managed.

The collaborative council process puts the best science to work in our nation's waters, drawing on NOAA's environmental intelligence to improve stock assessments, reduce bycatch, and assess the impact of climate change on fish populations. In Alaska, science is behind every fishery management decision. We've implemented the North Pacific fishery observer program to improve monitoring of fishing activity, including bycatch. This industry-funded program is one of the best in the nation. One way we are addressing the impact of climate change on fish populations is through the Alaska Fishery Science Center's Draft Southeastern Bering Sea Climate Regional Action plan.

The goal is to get the most benefit from our fisheries for food and economic well-being, while conserving ecosystem health and fish stocks for continued productivity to benefit future generations of fishing families and coastal communities.

Whether you enjoy casting a line from a nearby pier, or savoring fish at your local restaurant, seafood is in America's DNA. Sustainable fisheries are everyone's business. Magnuson-Stevens is a tried-and-true roadmap that NOAA Fisheries, the North Pacific

Fishery Management Council, our nation's seven other regional councils, and fishing industries and coastal communities are making work.

Michael Ramsingh
SeafoodNews.com 1-732-240-5330
Editorial Email: Editor@seafood.com
Reporter's Email: michaelramsingh@seafood.com

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