

November 24, 2020

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

RE: Item C2 Cook Inlet Salmon FMP

Mr. Chairman and Council members,

The introduction of Alternative 4 at the October NPFMC meeting by the State of Alaska representative is just the latest example, following a long list of examples, of why the State of Alaska cannot be entrusted with the management of the Cook Inlet salmon stocks.

For more than twenty years, the State of Alaska has been systematically destroying the commercial fishing industry in Cook Inlet. Year after year there has been a series of increasing restrictions on all the commercial fishermen, limiting the time and the area where we can fish. At the same time, escapement goals for many stocks were raised far above the level needed for maximum sustained yield. The erroneous escapement goals and these restrictions have had no biological or scientific basis, they were developed purely for political reasons. All these artificial goals and restrictions have shifted the management of this salmon resource further and further away from what is required by federal law.

Now that the courts have ordered NMFS and the Council to comply with federal law and ensure that State management also complies with federal law, the State has openly revealed its true intent. And they have provided a textbook example of why it is necessary to have federal laws that require national resources (like salmon) to be managed in the national interest.

What the State of Alaska is attempting to do, with Alternative 4, is to effectively eliminate the entire Cook Inlet seafood industry. The State is clearly demonstrating the reason why federal law, the Magnuson-Stevens Act (MSA), requires that fishery management plans be developed and applied to the entire fishery. Not just a portion of the fishery, but the entire fishery, as defined in the MSA.

The Cook Inlet salmon fishery is unlike many of the other salmon fisheries around Alaska in that a large part of the fishery occurs in federal waters. This fishery traditionally started in mid-June and was mostly over by late August. The salmon harvested up to mid-July are harvested primarily by the drift gillnet fleet and are harvested almost entirely in federal waters, in the EEZ. This early harvest is critical for the seafood processing companies as it allows them time to train employees before the peak of the run and it supplies a premium product for a very valuable fresh market in the lower 48 states. The timing of the salmon harvest is of extreme importance as premium quality fish supplied to a fresh market are worth two to three times more than a lesser quality frozen product. The lower half of Cook Inlet, the EEZ, can also be the most productive area for the drift fleet to fish later in July and into August. Without access to this area the drift fleet cannot harvest enough salmon to meet expenses and cannot afford to operate. Without the drift fleet harvest, the seafood processing companies cannot afford to operate and will close their businesses. This is not speculation; this is exactly what has already been happening in the Cook Inlet salmon fishery.

The loss of the drift fleet and the seafood processing companies will set off an economic tsunami that will devastate the economy of the Kenai Peninsula Borough. The Upper Cook Inlet salmon fishery also provides most of the funding for the Cook Inlet Aquaculture Association. The loss of that funding will force the CIAA to close, wiping out years of effort on salmon rehabilitation projects, closing all their hatchery and stocking programs and more. There are hundreds of businesses that are closely linked to the seafood industry that will be affected and some of them will close. All of this is happening because the State of Alaska (ADFG and the Board of Fisheries) have been deliberately mis-managing the salmon resources of Cook Inlet and they do not want to change.

Alternative 4 is contrary to the very purpose and intent of the Magnuson-Stevens Act. It is illogical, ill-conceived and should be soundly rejected.

I support the concept of having the Council and NMFS delegate authority to the State for in-season management but not Alternative 2 as it currently is written in the draft document. Alternative 2 must require that all escapement goals, management plans, allocations and in-season management practices for all Cook Inlet salmon stocks meet the requirements of the MSA and the Ten National Standards and be applied to the entire fishery.

Sincerely,

Erik Huebsch
F/V Williwaw
Kasilof Alaska