



United Cook Inlet Drift Association

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Date: September 28, 2020

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

Re: Salmon Management Plan

Delivered Electronically

Council Members:

While the North Pacific Fisheries Management Council (Council) debates the shape of the fishery management plan, the commercial salmon fishery in Cook Inlet is facing economic collapse. The average commercial driftnet salmon fisher in 2020 caught less than 700 sockeye for the entire season with a gross value from all salmon species of about \$4,400 for the year (see attachments). The commercial salmon setnet gear group had similar harvest and economics. The only way to describe such a fishing season is disastrous. Sadly, this is now the third consecutive terrible commercial salmon fishing season for Cook Inlet, all in stark contrast to what Congress mandated in the Magnuson-Stevens Act (MSA).

It did not need to be such a disaster. Poor management by the State of Alaska again allowed wasteful over-escapement of sockeye salmon into the Kenai and Kasilof Rivers. The over-escapement was measured at 1.1 million fish, an amount nearly double the entire commercial catch of 697,000 sockeye. Equally troubling is while commercial salmon fishers sat idle this summer, 10 to 20 million pink salmon went unharvested in Cook Inlet and this wasted resource is now rotting in our rivers and streams. The commercial catch of pink salmon was only 343,000 fish. This is, once again, a fishery disaster caused by State of Alaska salmon management policies and practices that do not meet the requirements of the MSA and the National Standards.

In the midst of these troubles, it is unfortunate that the Council appears content to plod along with its pre-determined plans to turn the keys to the fishery over to the State of Alaska, based on the mistaken belief that the State is “best suited” to manage the fishery. Just take a look around. In recent years, Chinook

returns have plummeted in Cook Inlet, sockeye are returning smaller in size and abundance, invasive species are taking over essential salmon habitat, habitat degradation is not being monitored or addressed and the State's response is to cut funding for management, including not collecting scientific data and management indices necessary for MSY management. These cuts include eliminating smolt outmigration counters, eliminating weirs used to count returning salmon, eliminating a sonar counter, and pulling the remaining sonar counters before the entire run is in the river. The result is millions of unharvested surplus salmon and disastrous economic harm to the commercial fishing industry and fishing communities along with biological harm to the salmon resource. With up to a \$2.0 billion annual budget deficit, the State has no financial capacity (or apparent interest) to address the emerging challenges to this fishery in years to come. If this is what "best suited" fishery management looks like, the future is dire for Cook Inlet fishing communities.

Nor are the State's salmon management failings limited to Cook Inlet. The Chignik salmon fishery was not allowed even one commercial fishery opening this year, a repeat of their 2018 disaster. Southeast Alaska, Prince William Sound (PWS), Norton Sound and the Yukon-Kuskokwim (AYK) areas are all experiencing small returns and much smaller-sized salmon (Oke et al, 2020).

Cook Inlet commercial fishing groups, including UCIDA, CIFF and other fishing communities, are sending economic disaster requests to our local governments, the State of Alaska and the Secretary of Commerce. These disaster declarations and requests are occurring because of disastrous salmon harvests. Many local, state and national officials have reviewed the harvest numbers and the smaller size of these salmon stocks (Tradex Food video, 2020). UCIDA and CIFF along with other members of the fishing community are anxiously awaiting the reaction of the Council and NMFS and how these economic disasters will be addressed in the Salmon FMP and National Environmental Policy Act analysis. How will the Council and NMFS reconcile the fact that they are attempting to perpetuate the same management practices that helped to create these fishery disasters?

We wish to reiterate the content of our letter to the Council dated May 18, 2020, regarding ADF&G's salmon management practices and escapement goals. Not a single stock of salmon returning to Cook Inlet is being managed on the basis of MSY, as directed by the MSA and National Standard 1. Achieving optimum yield (OY) on a continuing basis on salmon stocks requires setting escapement goals on the basis of MSY and managing for exploitation rates (Fmsy) to achieve those goals. MSY or OY cannot be achieved on salmon stocks if either underfishing or overfishing occurs.

The escapement goal discussion in the appendices of the current EA/RIR of the Alaska Salmon FMP is still an incomplete and flawed version that UCIDA and the stakeholder salmon committee members have commented on several times. Also, we have explained many times that the Tier system described in the EA/RIR

for annually determining the status of the salmon stocks in Cook Inlet, cannot and will not work in the fast paced, mixed stock commercial fishery in Cook Inlet. In Cook Inlet, except for Chinook stocks, all stocks of salmon are intermingled spatially in one large stock complex with some temporal stratification. Applying the Tier system as it is described in the EA/RIR to the inseason management of the Cook Inlet salmon fishery will create an absolute conflict with the OY/MSY requirements of the MSA and National Standard 1.

In Appendix 10 to the EA/RIR, the Kenai and Kasilof River sockeye salmon escapement goal discussion fails to include the 2011, 2012, 2013, 2014 and 2015 brood years. In avoiding these years of large escapements and small returns, it appears there is “cherry-picking” of available data by excluding recent brood years. Also, nowhere in the escapement goal discussion in Appendix 10 are the values identified in the 5 different models used for comparison (Ricker, Brood Year Interaction, Beverton-Holt, etc.), for the (a) alpha parameter (which describes the maximum productivity or recruits per spawner) or the (b) beta parameter (which describes the equilibrium abundance of the unfished stock). The mathematical values for (a) and (b) need to be “ground-truthed” and reconciled with what is actually happening in the salmon returns to Cook Inlet. It appears that the values used for the alpha and beta parameters are far from reality and the error in these foundational values are compounded throughout the equations. A professional, scientific and non-biased review of this information is necessary to evaluate the validity of the opinions expressed in this appendix.

Under all these circumstances, it is difficult to understand why any member of the Council believes the Cook Inlet salmon fishery, the salmon resource, the commercial fishers or fishing communities will be better off as a result of the Council’s proposed actions here. The only way to ensure proper management of the Cook Inlet salmon fishery is to develop an enforceable fishery management plan that covers the entire range of the stocks, not one that artificially stops at the EEZ. UCIDA has repeatedly explained why this result is *required* by the MSA. See Exhibits A and B. Also, see 50 C.F.R. § 600.320(b) (“The geographic scope of the fishery, for planning purposes, should cover the entire range of the stock(s) of fish, and not be overly constrained by political boundaries.”). The Council’s decision to move forward without even *considering* management throughout the range cannot be squared with the purpose, intent, or policies of the MSA and 10 National Standards.

If the Council proceeds on its present path, the fate of the commercial salmon fishery in Cook Inlet is clear. The State is going to continue to ruin the commercial fishery until someone tells them to stop. Right now, the only ones who can tell them to stop are the Council and NMFS. On the present path, the commercial fishery in Cook Inlet will be non-existent within a few years. That appears to be the goal of the State; it should not be a goal shared by the Council. We respectfully urge the Council to consider management of salmon stocks throughout the range and ensure the fishery is managed in a manner consistent with the MSA as the Ninth Circuit Court ruled. Cook Inlet fishing communities further

ask and urge the Council to faithfully consider the fate of the salmon stocks and the industry. Once again, the Council and NMFS are headed into illegal and dangerous management policies and practices.

Sincerely,

Original Signed Document

David Martin, President
United Cook Inlet Drift Association

References

1. Oke, K.B., Cunningham, C.J., Westley, P.A.H. *et al.* Recent declines in salmon body size impact ecosystems and fisheries. *Nat Commun* **11**, 4155 (2020). <https://doi.org/10.1038/s41467-020-17726-z>
2. Tradex Foods Inc, *3MMI - How Smaller Salmon Could Change the Industry*. <https://youtu.be/eBumg9MeiF4>

Attachments

1. Number of salmon harvested by the Upper Cook Inlet Commercial Fishery 1985-2020, *ADFG Annual Management Reports, 1985-2020*
2. Economic Value of Sockeye Salmon Harvested by the Drift Gillnet Fishery 2005-2020
3. Upper Cook Inlet Commercial Salmon Catch for August 15, 2020, *ADFG*

cc: President Donald Trump
Presidential Economic Advisor Larry Kudlow
Secretary of Commerce Wilbur Ross
Assistant Administrator for NOAA Fisheries Chris Oliver
Director of NOAA Fisheries' Office of Sustainable Fisheries Kelly Denit
State Director USDA Rural Development Jerry Ward
US Senator Lisa Murkowski
US Senator Dan Sullivan
US Congressman Don Young
Senator Peter Micciche
Senator Gary Stevens
Representative Sara Vance
Representative Ben Carpenter
Kenai Peninsula Borough Mayor Charlie Pierce & Assembly
Kenai Peninsula Economic Development District
Cook Inlet Aquaculture Association
Kenai City Mayor Brian Gabriel
Homer City Mayor Ken Castner
Soldotna City Mayor Pete Sprague

Attachment 1

Number of salmon harvested by the Upper Cook Inlet Commercial Drift Gillnet Fishery 1985-2020						
Year	Chinook	Sockeye	Coho	Pink	Chum	Grand Total
1985	2,048	2,032,957	357,388	34,228	700,848	3,127,469
1986	1,834	2,837,857	506,818	615,522	1,012,669	4,974,700
1987	4,552	5,638,916	202,506	38,714	211,745	6,096,433
1988	2,237	4,139,358	278,828	227,885	582,699	5,231,007
1989		5	856	2	72	935
1990	621	2,305,742	247,453	323,955	289,521	3,167,292
1991	246	1,118,138	176,245	5,791	215,476	1,515,896
1992	615	6,069,495	267,300	423,738	232,955	6,994,103
1993	765	2,558,732	121,829	46,463	88,826	2,816,615
1994	464	1,901,475	310,114	256,248	249,748	2,718,049
1995	594	1,773,873	241,473	64,632	468,224	2,548,796
1996	389	2,205,067	171,434	122,728	140,987	2,640,605
1997	627	2,197,961	78,666	29,920	92,163	2,399,337
1998	335	599,396	83,338	200,382	88,080	971,531
1999	575	1,413,995	64,814	3,552	166,612	1,649,548
2000	270	656,427	131,478	90,508	118,074	996,757
2001	619	846,275	39,418	31,219	75,599	993,130
2002	415	1,367,251	125,831	224,229	224,587	1,942,313
2003	1,240	1,593,638	52,432	30,376	106,468	1,784,154
2004	1,104	2,529,642	199,587	235,524	137,041	3,102,898
2005	1,958	2,520,327	144,753	31,230	65,671	2,763,939
2006	2,782	784,771	98,473	212,808	59,965	1,158,799
2007	912	1,823,481	108,703	67,398	74,836	2,075,330
2008	653	983,303	89,428	103,867	46,010	1,223,261
2009	859	968,075	82,096	139,676	77,073	1,267,779
2010	538	1,587,657	110,275	164,005	216,977	2,079,452
2011	593	3,201,035	40,858	15,333	111,082	3,368,901
2012	218	2,924,144	74,678	303,216	264,513	3,566,769
2013	493	1,662,561	184,771	30,605	132,172	2,010,602
2014	382	1,501,678	76,932	417,344	108,345	2,104,681
2015	556	1,012,684	130,720	21,653	252,331	1,417,944
2016	606	1,266,746	90,242	268,908	113,258	1,739,760
2017	264	880,279	191,490	89,963	232,501	1,394,497
2018	503	400,269	108,906	83,535	108,216	701,429
2019	178	749,101	88,618	27,607	112,518	978,022
2020	126	283,772	24,419	293,122	24,696	626,135
2010-2019 Avg	421	1,510,944	109,691	139,796	159,437	1,920,289
2010-2019 (excludes 2018)	411	1,649,779	109,789	146,829	165,840	2,072,647
Average ALL	913	1,887,209	150,821	142,365	205,082	2,386,364

Attachment 2

Economic Value of Sockeye Salmon Harvested by the Drift Gillnet Fishery 2005-2020*				
Year	Average Wt (lbs)	Sockeye Harvest	Average \$/lb.	Economic Value \$
2005	6.1	2,520,327	0.95	14,605,295
2006	5.1	784,771	1.10	4,402,565
2007	6.3	1,823,481	1.05	12,062,327
2008	6.3	983,303	1.10	6,814,290
2009	6.4	968,075	1.10	6,815,248
2010	6.3	1,587,657	1.75	17,503,918
2011	6.5	3,201,035	1.50	31,210,091
2012	6.9	2,924,144	1.50	30,264,890
2013	6.5	1,662,561	2.25	24,314,955
2014	6.6	1,501,678	2.25	22,299,918
2015	5.5	1,012,684	1.60	8,911,619
2016	5.9	1,266,746	1.50	11,210,702
2017	5.9	880,279	1.85	9,608,245
2018	4.7	440,269	2.04	4,221,299
2019	5.2	749,101	1.85	7,214,142
2020	5.0	283,772	1.35	1,915,461
		2010 -2019 Average		16,675,978
* Source: ADF&G Annual Management Reports				
2010-2019 Average Economic Value:			\$16,675,978	
2020 Economic Value:			\$1,915,461	
2020 Lost Economic Value:			88%	

UPPER COOK INLET COMMERCIAL SALMON CATCH FOR August 15, 2020
ADP & G - Drift Fleet added to the bottom of page. UCIDA calculations in Italics. (D) = Drift (S) = Semet

Fishery	Deliveries	CHINOOK			SCKEYE			COHO			PINK			CHUM			TOTAL		
		CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum	CPUE	Daily	Cum
Upper Cook Inlet Total	24		2,930		36	858	643,871	10	240	99,426	19	462	343,878	2	45	28,507	1,605	1,161,939	
A. Northern District Total			1,657		36	858	643,871	10	240	99,426	19	462	343,878	2	45	28,507	1,605	1,161,939	
1. Northern District West			1,369																
a. Trading Bay 247-10			237																
b. Tyonek 247-20			725																
c. Beluga 247-30			2																
d. Sustina Flat 247-41			7																
e. Pt. Mackenzie 247-42			151																
f. Fire Island 247-43			247																
2. Northern District East			288																
a. Pt. Possession 247-70			220																
b. Birch Hill 247-80			52																
c. Number 3 Bay 247-90			16																
B. Central District Total	24		1,273		36	858	643,871	10	240	57,087	19	462	317,275	2	45	26,515	1,605	1,046,021	
1. East Side Set Total			831																
a. Sannator/EastForelands			257																
1. Sannator 244-41			249																
2. East Forelands 244-42			8																
b. Kallifonsky Beach			150																
1. South K. Beach 244-31			106																
2. North K. Beach 244-32			44																
d. Cohoe/Nimlichik			424																
1. Cohoe 244-22			250																
2. Nimlichik 244-21			174																
2. West Side Set Total			71																
a. Little Jack Slough 245-50			1																
c. Tuxedni Bay 245-30			70																
3. Kusatan Total			78																
a. Big River 245-55			74																
b. West Foreland 245-60			4																
4. Kalgin Island Total			167																
a. West Side 246-10			167																
b. East Side 246-20																			
5. Chinina Bay Total																			
a. Set 245-10																			
6. Central District Set Total			1,147																
7. Central District Drift Total	24		126		36	858	283,772	10	240	24,419	19	462	293,122	2	45	24,696	1,605	626,135	
b. East Side 244-50, 60, 70			80				107,331			19,444			15,627			11,649		136,631	
c. East Side Corridor Total	24		46		36	858	176,441	10	240	22,475	19	462	277,495	2	45	13,047	1,605	489,504	
2. Kaslof Corridor 244-61							315			1			6			6		328	
3. E. Side Corridor 244-55	24		46		36	858	176,126	10	240	22,474	19	462	277,489	2	45	13,041	1,605	489,176	
lbs.			126 x 15		(D) 283,772 lbs. (S) 295,052 lbs.					24,419 x 5.8		293,122 x 3.1			24,696 x 5.8				
\$/lb.			x 3.50		x 5.0 lb average x \$1.25					x .70		x .25			x .70				
Economic Value			6,615		(D) 1,773,575 (S) 1,843,906					99,141		277,170			100,266			2,256,757	