



United Cook Inlet Drift Association

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• info@ucida.org •

Date: September 30, 2020

Addressee: Wilbur Ross, Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: 2020 Pink Salmon Economic Disaster Declaration

The United Cook Inlet Drift Association (UCIDA), as per the Magnuson-Stevens Act (MSA), brings forward Resolution 2020-011 and statement of findings declaring a pink salmon economic disaster for the Upper Cook Inlet (UCI) drift gillnet salmon fishery. UCIDA also requests the Secretary of Commerce declare an economic disaster for the UCI drift gillnet pink salmon fishery and provide a supporting recovery plan.

In 2020, the Upper Cook Inlet drift gillnet pink salmon harvest of 293,121 was less than 2% of the total return. It is estimated that 10-20 million pink salmon entered the UCI Area. The poor and biased management led by the Alaska Department of Fish and Game's Commissioner, Doug Vincent-Lang, once again allowed wasteful underharvests of pink salmon.

Historically, pink salmon harvests occurred up to December 31. However, now under the current management regime, the fishery was effectively closed on July 16, when crippling time and area restrictions occurred. Pink salmon entered UCI approximately the third week in July and continued to increase in number until the third week in August. During that entire time period, due to the neglectful management by the ADF&G Commissioner, the commercial drift gillnet fleet was restricted from harvesting this abundant resource.

In 2020, a minimum of 4 million dollars of economic value was lost by the UCI Commercial Drift pink salmon fishery.

By modest estimates, the 2020 pink salmon return to UCI was between 10-20 million individual fish. Pink salmon can safely have a 60-70% exploitation rate, or an allowed harvest percentage of a total return. With a modest estimate of 12 million pink salmon in the 2020 return, an exploitation rate of approximately 60%, or 7 million fish, is both permissible and warranted. With an estimate of 20 million

pink salmon in the 2020 return, an exploitation of rate of 60%, or 12 million fish, could have occurred. This economic disaster request is based on available salmon stocks and foregone harvest opportunities.

Pink salmon in UCI average 3.2 lbs. and are some of the largest in the North Pacific Region. At 3.2 lbs., a pink salmon represents a meal for a family of four. As a National food source, 7 million pinks represents up to 7 million families with dinner on the table.

Historical harvest records are a poor indicator of this pink salmon economic disasters. Pink salmon returns display a 2-year cycle. In most of Alaska, pink returns occur in the odd-numbered years. UCI pink salmon are on an even-year cycle. The State of Alaska is aware of the even-year UCI pink cycle.

In 2020, 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, see Attachments 1 and 2. The commercial catch of pink salmon was only 293,121 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.

Equally troubling is the Alaska Board of Fisheries (BOF) adopted 5 AAC 21.354. Cook Inlet Pink Salmon Management Plan which states:“(a) The purpose of this management plan is to allow for the harvest of surplus pink salmon in the Upper Subdistrict for set gillnet and drift gillnet gear.” The regulation goes on to indicate that “gillnets may not have a mesh size greater than four and three quarters inches.” This mesh size restriction applies to both drift and set gillnet gear. Following the adoption of this mesh size restriction, hundreds of Drift/ESSN fishermen purchased new nets with this smaller mesh size in order to legally participate in the pink salmon harvests. A large, harvestable surplus of pink salmon was available. Commercial Drift/ESSN fishermen were legally licensed, ready, willing and able to participate in this fishery. Further, many fishermen personally asked and encouraged the State of Alaska to conduct a pink salmon fishery in UCI. As fishermen, we personally observed numerous pink salmon migrating along the ESSN beaches and through the waters of UCI.

The 2020 pink salmon economic disaster occurred due to the State’s decision to deny a pink salmon fishery. 2020 did not need to be such a disaster for UCI commercial fishermen. Poor and biased management led by the Alaska Department of Fish and Game’s Commissioner, Doug Vincent-Lang, once again allowed wasteful underharvests of pink salmon.

In recent years, 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.

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. UCIDA and CIFF along with other members of the fishing community are anxiously awaiting the reaction of the Secretary of Commerce and the State of Alaska concerning these economic disasters.

UCIDA requests directly from you, Mr. Secretary Ross, an economic disaster declaration for the 2020 Upper Cook Inlet sockeye salmon season.

UCIDA is prepared to discuss and answer questions concerning this disaster and looks forward to achieving the economic disaster declaration from your office. We will cooperate with you and your officials at the Department of Commerce, Congress and the State of Alaska to obtain adequate appropriations.

United Cook Inlet Drift Association Resolution 2020-011

WHEREAS, UCIDA is a duly registered, fishing community association recognized by the State of Alaska and the Federal Government; and

WHEREAS, UCIDA is a professional commercial salmon trade association; the Board of Directors are elected by participants of the fishery; and

WHEREAS, UCIDA provides for the wholesale or retail marketing, sale, delivery, distribution, or processing of drift gill net salmon and its by-products, caught in all waters of and adjacent to the Pacific Ocean north of a line extending east from Cape Douglas to the longitude of Cape Fairfield; including the negotiation of wholesale and/or retail prices, contracts, sale’s agreements, distribution, processing, marketing, custom processing, agency, brokerage, and shipping agreements and contracts for its members; and

WHEREAS, UCIDA does research, obtains grants, and makes studies for the enhancement, rehabilitation and marketing of commercial drift

gillnet caught salmon and makes proposals and lobbies for legislation and regulations to promote and better the commercial salmon industry; and

WHEREAS, UCIDA participates in legal actions determined by the Board of Directors to be in the best interest of the commercial fishing community; and

WHEREAS, UCIDA engages in and exercises such other powers as are now set out in the Alaska Cooperative Corporation Act, and any other lawful activities, except banking or insurance or the furnishing of electrical or telephone service; and

WHEREAS, UCIDA members own several hundred vessels that are directly used in the harvesting of salmon and other fish stocks, and members primarily reside in Alaska and the Pacific Northwest; and

WHEREAS, UCIDA members have invested many millions of dollars in vessels, limited access fishing privileges, homes, docks, vehicles, nets, gear and equipment.

WHEREAS, the drift gillnet fishermen were, by regulation, prevented from harvesting pink salmon during the historical time of year and from traditional areas as they migrate into UCI; and

WHEREAS, State regulators have abandoned abundance-based management practices in favor of highly prescriptive-based management practices causing insufficient fishing opportunity and resulting in economic disasters, reduced food supply and economies; and

WHEREAS, this extremely low harvest was below the level necessary to cover the cost of operating and maintaining the commercial drift gillnet fisher, processing and marketing businesses in the Kenai Peninsula Borough; and

WHEREAS, UCIDA has letters from the Cook Inlet Fisherman's Fund, Copper River Seafoods, Cook Inlet Aquaculture Association, and the Kenai Peninsula Economic Development District who have all urged the UCIDA and others to request the Secretary of Commerce to declare an economic disaster for the Upper Cook Inlet pink salmon commercial fisheries due to the failure of the 2020 season; and

NOW, THEREFORE, BE IT RESOLVED BY THE UCIDA BOARD OF DIRECTORS:

SECTION 1. That UCIDA declares an economic disaster exists among the commercial drift gillnet fishing community as a result of the 2020 UCI pink salmon fishery.

SECTION 2. That the UCIDA Board of Directors respectfully requests the State of Alaska declares an economic disaster for the 2020 UCI commercial drift gillnet pink salmon fishery.

SECTION 3. UCIDA respectfully requests the Secretary of Commerce declares an economic disaster, as provided for in MSA and the IFA, and implement a recovery plan that provides private and public assistance and takes other actions to benefit the commercial drift gillnet fishery participants and others that rely on this important fishery resource.

SECTION 4. UCIDA requests that copies of each economic disaster resolution be provided to the Kenai Peninsula Borough Assembly and Mayor, the Governor of Alaska as well as other affected parties.

SECTION 5. That this resolution becomes effective immediately upon its adoption.

ADOPTED BY THE UCIDA BOARD OF DIRECTORS THIS 29TH DAY OF SEPTEMBER 2020.

Sincerely,

Original Signed Document

David Martin, President
United Cook Inlet Drift Association

cc: State Director USDA Rural Development Jerry Ward
Kenai Peninsula Borough Mayor Charlie Pierce
Kenai Peninsula Borough Assembly
Kenai City Mayor Brian Gabriel
Homer City Mayor Ken Castner
Soldotna City Mayor Peter Sprague
Kenai Peninsula Economic Development District

Cook Inlet Aquaculture Association

Cook Inlet Processors:

Pacific Star Seafoods

Copper River Seafoods

OBI Seafoods, Inc.

Attachment 1. Dead pink salmon Kenai River at approximately River Mile 18 on September 19, 2020. It is estimated there is one carcass per foot on the east bank only.



Attachment 2. Dead pink salmon Kenai River at approximately River Mile 18 on September 19, 2020. It is estimated there is one carcass per foot on the east bank only.

