Date: September 30, 2016

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

RE: Agenda Item B-2, UCIDA Ninth Circuit Court Decision

Dear Mr. Hull,

These comments are submitted on behalf of Cook Inlet Fisherman’s Fund (CIFF). CIFF was co-plaintiff with UCIDA in this recently concluded litigation. CIFF membership includes drift gillnet and set gillnet fishermen, members of the general public and federal subsistence participants. We hope that the Council is willing to see the development of a new Fishery Management Plan (FMP) as a new opportunity. CIFF is ready and willing to work with the Council to make the most of this opportunity.

We also appreciate that there are some technical decisions as how to proceed with the development of a salmon committee that can bring stakeholders participation into the development of this new FMP.

Over the past four years, there have been major fishery disasters declared in Alaska: Yukon & Kuskokwim Chinook, Cook Inlet Chinook as well as Prince William Sound, Lower Cook Inlet, Chignik and Kodiak Pinks. Collectively, the Chinook and Pink Salmon disasters cover the majority of the state-managed fisheries. There is simply no justification for these systemic, state-wide salmon fishery disasters. The notion that the State of Alaska is doing a great job of managing salmon is hollow and is not supported by these reoccurring salmon run disasters.
The Board of Fish/ADF&G stock of concern designations for Susitna Sockeye Salmon and seven (7) different Cook Inlet Chinook stocks has created unnecessary harvest restrictions. During this time of fishery budget cuts, the substantial increase of unharvested surpluses resulted in millions of dollars in economic loss.

We believe this is a timely opportunity to invest in environmental stewardship. The salmon resources in the Cook Inlet watershed are facing unprecedented threats to their survival and many stocks are in decline from the effects of climate change, warm water, invasive species, urbanization and management schemes based on faulty or incorrect data. We need to utilize the best available science and put the collaborative council process to work on these issues to ensure the sustainability of these resources.

The salmon industry is by far the largest employment sector in Southcentral Alaska. However, the viability of this industry is threatened and will require the combined efforts of the Council, ADF&G and the industry stakeholders working together to create a salmon FMP that will ensure its survival.

Sincerely,

*Original Signed Document*

John McCombs, President
Cook Inlet Fisherman's Fund