

Public comments to the NPFMC regarding the State of Alaska's effort to close federal waters to commercial salmon fishing in Cook Inlet.
December, 2020

This document is a compilation of the public comments provided to the North Pacific Fisheries Management Council (Council), at their December 2020 meeting, regarding the 4 Alternatives for amending the Alaska Salmon Fisheries Management Plan (FMP).

The general public was given one week to provide written comments to the Council regarding their final action on the Amendment to the FMP. Out of 225 written and 35 spoken comments, the only commenter in support of Alternative 4 was the Kenai River Sportfishing Association.

The Magnuson-Stevens Act, with 10 National Standards for fishery management, was designed to safeguard resource sustainability, national food security and coastal community economies, among other values. Commenters made it clear that closing the EEZ to commercial salmon harvest was very likely to close the entire salmon fishery in Cook Inlet. Almost all of the commenters were residents of Southcentral Alaska. An overwhelming number of them cited their own, and their communities' economic and social reliance on the salmon fishery. State legislators, municipal representatives, economic development analysts, sportfishing representatives and non-fishing business owners emphasized the regional economic importance of the commercial salmon fishery in Cook Inlet.

Oral testimony was provided by the following 35 people:
Representative Ben Carpenter, Alaska State House; Matt Gruening, for Representative Louise Stutes, Alaska State House; Doug Letch, for Senator Gary Stevens, Alaska State Senate; Senator Peter Micciche, Alaska State Senate President; Brent Johnson, Kenai Peninsula Borough; Paul Ostrander, City of Kenai; Norman Regis, City of Seward; Tim Dillon, Kenai Peninsula Economic Development District; David Martin, United Cook Drift Association; Robert Ruffner, Alaska Salmon Alliance; Ben Mohr, Kenai River Sportfishing Association; Brian Ritchie, Homer Charter Association; Dr. Roland Maw, Cook Inlet Fisherman's Fund; Gary Hollier, Setnetter Cook Inlet; Matt Pancratz, Individual Cook Inlet commercial fisherman, Nikolaevsk/Alaskan resident, gillnetter/net hanger; John McCombs; Yakov Reutov, Commercial Fisherman; McKenzie Mahan, FV Three Sisters; Terrence Hanofee; Dan Anderson; Ted Crookston, Setnetter - Cook Inlet; Molly & Justin Brown; Annette Bellamy, Commercial fisher; Ken Coleman, Cook Inlet Set netter; Revelle Russell; Taylor H Evenson, FV Nedra E; Georgie Heaverley, UCI Drift Fisherman / FMP Salmon Committee Members; Erik Huebsch, Hannah Heimbuch; Steve Vanek; Matt Oxford, Upper Cook Inlet Fisherman; Dr. Hannah Harrison; Karen and Richard McGahan, Cook Inlet setnetters; Charles Lindsay, Cook Inlet Commercial Fisherman.

Below are 147 of the written comments; 78 additional comments opposing Alternative 4 were not included due to repetition and in the interest of brevity. Commenters could submit pdfs or write directly into the Council's comment portal. The comments sent via pdf are listed first below.



Sponsored by: Mayor Gabriel

CITY OF KENAI

RESOLUTION NO. 2020-89

A RESOLUTION OF THE CITY OF KENAI, ALASKA, OPPOSING ALTERNATIVE 4 PROPOSED TO THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL THAT WOULD CLOSE ALL FEDERAL WATERS IN COOK INLET TO COMMERCIAL SALMON FISHING.

WHEREAS, the North Pacific Fishery Management Council developed the *Fishery Management Plan for Salmon Fisheries in the EEZ off Alaska*, (FMP) that manages salmon fisheries in the United State Exclusive Economic Zone (EEZ; 3 nautical miles to 200 nautical miles off shore of Alaska); and,

WHEREAS, pursuant to a United States Court of Appeals Ninth Circuit ruling, after successful litigation brought by Cook Inlet commercial fishermen and seafood processors, the North Pacific Fishery Management Council must amend the FMP to bring it in line with the Ninth Circuit Court's decision; and,

WHEREAS, the North Pacific Fishery Management Council is considering four alternative amendments to the FMP:

Alternative 1 is status quo or no action, deferring management to the State of Alaska by excluding the traditional net fishing area in the Cook Inlet EEZ from the FMP (the Ninth Circuit Court ruling makes this alternative "untenable" according to the authors' of the Public Review Draft Environmental Assessment/ Regulatory Impact Review for Proposed Alternative XX to the Fishery Management Plan for the Salmon Fisheries in the EEZ Off Alaska);

Alternative 2 would establish federal management of the commercial salmon fishery in Cook Inlet with management of the commercial fishery delegated to the State of Alaska in accordance with the Magnuson Stevens Act and other applicable federal law;

Alternative 3 would establish Federal management of the commercial salmon fishery in Cook Inlet with the North Pacific Fishery Management Council and national Marine Fisheries Service without delegation of management to the State of Alaska; and

Alternative 4 would effectively close all federal waters in Cook Inlet to commercial salmon fishing; and,

WHEREAS, the City Council of Kenai has consistently advocated for science-based fisheries management decisions; and,

WHEREAS, Alternative 4 proposed by the State of Alaska ADF&G Deputy Commissioner at the North Pacific Fishery Management Council's October 12, 2020 meeting after closure of public comment is not a science-based decision, but instead according to the United Cook Inlet Drift association is a punitive decision for bringing the lawsuit and rather than constituting a

management plan consistent with sound fishery management and applicable federal regulations simply short circuits the Court's decision and intent of the Magnuson Stevens Act and FMP by eliminating the fishery altogether; and,

WHEREAS, if Alternative 4 were adopted by the North Pacific Fishery Management Council, it would close the area of fishing where most the Cook Inlet Drift Fleet harvest occurs, effectively eliminating the economic viability of the fishery and viability of local seafood processors; and,

WHEREAS, the loss of the drift gillnet fishery in Cook Inlet would cause severe job loss, loss of capital investment in the fishery and support businesses, and could impact other fisheries if local processing capacity is lost or reduced; and,

WHEREAS, a 2015 report published by the McDowell group titled "The Economic Impact of the Seafood Industry in Southcentral Alaska" reported that the seafood industry in the reporting region directly employs over 10,000 people seasonally and had an economic output of \$1.2 billion; and,

WHEREAS, the City Council recognizes that the drift gillnet fleet, like other fisheries users, is a critical component of the City, positively contributing to the City's local history, culture and economy; and,

WHEREAS, the City Council opposes adoption by the North Pacific Fishery Management Council of Alternative 4 which would effectively end the Cook Inlet Drift Net fishery and cause sever local economic impact and other harm to the City.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA:

Section 1. That the City Council opposes the North Pacific Fishery Management Council adopting Alternative 4, and that a copy of this Resolution along with other consistent written comment from the Mayor or City manager be provided to the North Pacific Fishery Management Council as public comment for consideration at its December meeting.

Section 2. That the City Council has not considered which of the remaining alternatives should be adopted by the NPFMC.


Section 3. That this resolution takes effect immediately upon passage.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, this 23rd day of November, 2020.


BRIAN GABRIEL SR., MAYOR


ROBERT MOLLOY, VICE MAYOR


GLENEISE PETTEY, COUNCIL MEMBER

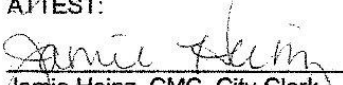

JIM GLENDENING, COUNCIL MEMBER

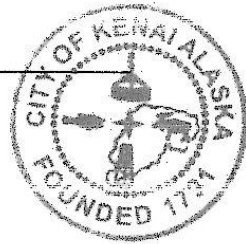

TEEA WINGER, COUNCIL MEMBER

SEAT VACANT, COUNCIL MEMBER


HENRY KNACKSTEDT, COUNCIL MEMBER

ATTEST:


Jamie Heinz, CMC, City Clerk



**CITY OF HOMER
HOMER, ALASKA**

Mayor/City Council

RESOLUTION 20-127

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA, STRONGLY OPPOSING ALTERNATIVE 4 IN THE PUBLIC REVIEW DRAFT ENVIRONMENTAL ASSESSMENT/REGULATORY IMPACT REVIEW FOR PROPOSED AMENDMENT XX TO THE FISHERY MANAGEMENT PLAN FOR THE SALMON FISHERIES IN THE EEZ OFF ALASKA THAT WOULD CLOSE ALL FEDERAL WATERS IN COOK INLET TO COMMERCIAL SALMON FISHING AND FINDING THAT IMPLEMENTATION OF ALTERNATIVE 4 WOULD HAVE A SIGNIFICANT ADVERSE IMPACT ON THE ECONOMY OF HOMER

WHEREAS, The North Pacific Fishery Management Council developed the *Fishery Management Plan for Salmon Fisheries in the EEZ off Alaska*, (FMP) that manages salmon fisheries in the United State Exclusive Economic Zone (EEZ; 3 nautical miles to 200 nautical miles off shore of Alaska); and

WHEREAS, Pursuant to a United States Court of Appeals Ninth Circuit ruling, after successful litigation brought by Cook Inlet commercial fishermen and seafood processors, the North Pacific Fishery Management Council must amend the FMP to bring it in line with the Ninth Circuit Court's decision; and

WHEREAS, Through its Public Review Draft Environmental Assessment/Regulatory Impact Review for Proposed Amendment XX to the Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska the North Pacific Fishery Management Council is considering four alternative amendments to the FMP:

Alternative 1 is status quo or no action, deferring management to the State of Alaska by excluding the traditional net fishing area in the Cook Inlet EEZ from the FMP (the Ninth Circuit Court ruling makes this alternative "untenable" according to the authors' of the Public Review Draft EA/RIR for Proposed Alternative XX to the Fishery Management Plan for the Salmon Fisheries in the EEZ Off Alaska);

Alternative 2 would establish federal management of the commercial salmon fishery in Cook Inlet with management of the commercial fishery delegated to the State of Alaska in accordance with the Magnuson Stevens Act and other applicable federal law;

41 Alternative 3 would establish Federal management of the commercial salmon fishery
42 in Cook Inlet with the North Pacific Fishery Management Council and national Marine
43 Fisheries Service without delegation of management to the State of Alaska; and
44

45 Alternative 4 would establish Federal management of the commercial salmon fishery in the
46 Cook Inlet EEZ with the EEZ closed to commercial fishing; and
47

48 WHEREAS, The waters of the Cook Inlet commercial salmon drift gillnet fishery included
49 by the EEZ are the closest fishing grounds to Homer and have been part of traditional fishing
50 grounds since statehood; and
51

52 WHEREAS, In 2014 the Homer City Council voiced opposition to restrictions on the Cook
53 Inlet Fishing District 1 (Resolution 14-019(A)), which is roughly equivalent to the area of the
54 EEZ, citing widespread and deleterious effects to local and regional economies; and
55

56 WHEREAS, The Homer City Council has consistently advocated for science-based
57 fisheries management decisions that are equitable across fishery users and sustainable for
58 continued human benefit into the future; and
59

60 WHEREAS, Alternative 4 was proposed by the State of Alaska Department of Fish and
61 Game Deputy Commissioner at the North Pacific Fishery Management Council's October 12,
62 2020 meeting after closure of public comment; and
63

64 WHEREAS, Alternative 4 is not a science-based alternative to fishery management, does
65 not result in equitable or sustainable distribution of the salmon harvest resource, was
66 introduced after public comment which is counter to the intent of the National Environmental
67 Policy Act, and does not adequately address the Ninth Circuit court ruling; and
68

69 WHEREAS, If Alternative 4 were adopted by the North Pacific Fishery Management
70 Council, it would close the area of fishing where most of the Cook Inlet salmon drift gillnet
71 fishery harvest occurs, effectively eliminating the economic viability of the fishery and viability
72 of local seafood processors; and
73

74 WHEREAS, The loss of the salmon drift gillnet fishery in Cook Inlet would cause severe
75 job loss, loss of capital investment in the fishery and support businesses, and could impact
76 other fisheries if local processing capacity is lost or reduced; and
77

78 WHEREAS, A 2015 report published by the McDowell group titled "The Economic Impact
79 of the Seafood Industry in Southcentral Alaska" reported that the seafood industry in the
80 reporting region directly employs over 10,000 people seasonally and had an economic output
81 of \$1.2 billion; and
82

83 WHEREAS, The Homer City Council recognizes that the salmon drift gillnet fleet, like
84 other fisheries users, is a critical component of Homer, positively contributing to the City's
85 local history, culture, and economy; and

86
87 WHEREAS, Section 4.55 of the EA/RIR presents information about fishing communities
88 associated with the Upper Cook Inlet salmon drift gillnet fishery and includes some of the
89 following information regarding the City of Homer:

90
91 Homer has the highest vessel participation of any community with participants in the
92 fishery with an annual average number 2009-2018 of 104.9, average percent of 24.38 of
93 total participants, and 197 unique vessels (Table 4-13);

94
95 Homer-based vessels receive the highest gross revenue from the fishery of communities
96 with participants in the fishery with an annual average revenue 2009-2018 of \$5,505,099
97 and 28.6 percent of total revenue (Table 4-14);

98
99 Homer has the highest permit participation in the fishery of communities participating
100 in the fishery with an annual average number 2009-2018 of 107.1, average percent of
101 23.55 of total permit holders, and 2.16 unique permits; and

102
103 WHEREAS, The closure of the fishery as proposed under Alternative 4 would have a
104 significant adverse impact on the economy of Homer through the loss of the livelihoods of
105 Homer based fishermen who participate in the Cook Inlet salmon drift gillnet fishery, marine
106 trades and other businesses based in Homer, and the City of Homer primarily through the loss
107 of harbor fees, ice and crane sales, fish landing tax revenues, and sales tax revenues; and

108
109 WHEREAS, The timeline allowing for public comment on Alternative 4 has been
110 inadequate generally, but particularly because the proposed closure of the fishery under
111 Alternative 4 would disproportionately affect the economic health of the Homer community.

112
113 NOW, THEREFORE, BE IT RESOLVED that the City Council of Homer, Alaska, hereby
114 opposes the North Pacific Fishery Management Council adopting Alternative 4, proposed to
115 the North Pacific Fishery Management Council that would close all federal waters in Cook Inlet
116 to commercial salmon fishing.

117
118 BE IT FURTHER RESOLVED that the City Council of Homer, Alaska, has determined that
119 implementation of Alternative 4 would have a significant adverse impact on the economy of
120 Homer.

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122 PASSED AND ADOPTED by the Homer City Council on this 25th day of November, 2020.
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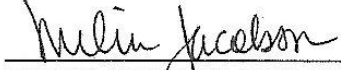
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CITY OF HOMER



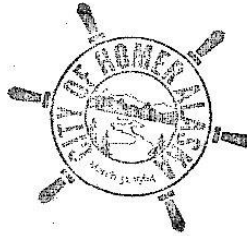
KEN CASTNER, MAYOR

ATTEST:



MELISSA JACOBSEN, MMC, CITY CLERK

Fiscal Note: N/A



Senator Peter A. Micciche
Alaska State Legislature

Session Address:

Alaska State Capitol, Rm. 504
Juneau, Alaska 99801-1182
Phone: (907) 465-2828
Toll Free: (800) 964-5733



Interim Address:

145 Main Street Loop, Ste. 226
Kenai, Alaska 99611-7771
Phone: (907) 283-7996
Fax: (907) 283-8127

November 25, 2020

Members of the North Pacific Fishery Management Council:

I am an Alaska State Senator and an active commercial fisherman who represents the central Kenai Peninsula, where many commercial salmon fishermen, crewmembers, fishing supply businesses, processors and process employees live and work. With respect to Upper Cook Inlet and the creation of a Fishery Management Plan (FMP), I am writing to ask that the Council not consider implementing Alternative 4 in your upcoming meeting.

Starting with the process, it is difficult to understand why the Council would advance this alternative in the manner that it came forward. The NPFMC has an excellent reputation of being methodical and thorough in its' analysis leading to any final action. As we have tracked this issue, the record indicates that the case was being made to pursue some variation of Alternative 2, which I support. The last-minute amendment put forward to simply close the Exclusive Economic Zone (EEZ) has not been supported by any analysis and has not been vetted in the tradition that the Council has taken on issues in the past. While a single gear type has been the focus here, there is much more at stake. This has clearly left the processing sector as well as the coastal communities I represent out of the decision-making process. Taking final action in support of Alternative 4 will harm the credibility of the Council, it is not a good-faith, problem-solving action.

Alternative 4 will have dramatic negative consequences for the entire commercial fishing industry in Cook Inlet, a commercial fishery which has been prosecuted for well over a century. Generations of Peninsula families have lived a life of fishing these waters, providing high quality protein to the nation and the world. Young crew members have earned money for college while being instilled with a work ethic which they carry with them for life. Alternative 4 will likely put an end to commercial salmon fishing in Cook Inlet and therefore, an Alaskan way of life.

Beyond the negative impacts to fishermen, their families and crewmembers, Alternative 4 will serve to decimate the few commercial processors who remain in the area. When the last processor closes their doors, the few commercial fishermen who may remain will be forced to hang up their gear and a century old key industry will become extinct.

User groups in the Cook Inlet area have long struggled to find a balance between sport, commercial, personal use and subsistence user groups. Alternative 4 drives a stake through the heart of one user group causing any chance of balance to be eliminated and 40 years of successful fisheries management to erupt into chaos. A fishery management plan is essential to ensuring salmon are available to all. However, a management plan which eliminates an entire group is short sighted, at best.

Some believe that the elimination of the opportunities in the EEZ will allow sport and personal use fisheries to thrive, unimpeded by commercial fisheries. The opposite is actually closer to the truth. Instead of a fishery beginning in late June, in an area with little allocation competition, more openings would be

Senator.Peter.Micciche@akleg.gov

required later in the season in order for the ADF&G to manage large quantities of returning fish, actually exacerbating the conflict. Inevitably, this will result in over-escapement and eventually smaller returns, directly and negatively impacting the quality and quantities of salmon available for the other sport, personal use and subsistence user groups. A 40-year relative balance would be upended without any consideration for economic impacts and ultimately, sustainability of the resource.

I cannot urge you strongly enough to avoid taking this path leading toward the ultimate destruction of commercial salmon fishing in Cook Inlet, and eventually negatively impacting the other user groups for decades. I recognize that management of fisheries is a challenge for all those who set future allocation levels. This alternative and the negative impacts on many thousands of Alaskans goes beyond a simple change in allocation. I sincerely hope you settle on a more traditional plan, such as Alternative 2, which balances the survival of the species and the various user groups who rely on salmon.

My primary job responsibility is to listen to my constituents. I have not heard from a single individual supporting the closure of the EEZ in Alternative 4. I have heard from many individuals, organizations and municipalities opposing the change. I request that you join me in opposition to Alternative 4. The plan appears to be a lose-lose that Alaska cannot afford, not only during these challenging times, but ever. We can and must do better for the sustainable salmon resources in Cook Inlet.

Politics and doing the right thing are often at odds. I respectfully request that in this case the right thing carries the day. Supporting Alternative 4 is not the right thing to do and I believe in your hearts most of you know that to be the case.

I am always available to further discuss my opposition to Alternative 4. I can be reached in my Kenai office at 907-283-7996.

Thank you for your thoughtful consideration.

Sincerely,

Senator Peter Micciche

CC: VIA ELECTRONIC TRANSMISSION

The Honorable Governor Mike Dunleavy
Ben Stevens, Chief of Staff to the Governor
Doug Vincent-Lang, Commissioner ADF&G

Senator.Peter.Micciche@akleg.gov



Alaska State Legislature

Representative Sarah Vance

House District 31

November 27, 2020

Members of the North Pacific Fishery Management Council:

I am an Alaska State Representative of the lower Kenai Peninsula, where many commercial salmon fishermen, crewmembers, fishing supply businesses, processors and process employees live and work. As the voice of District 31 which ranks #3 in the state for CFEC commercial fishing permits and #3 in sport fish licenses, I am writing to ask the Council reject implementing the Upper Cook Inlet, Alternative 4 plan and create a Fishery Management Plan (FMP) to benefit all user groups.

It is no secret that commercial fishing and seafood processing employs more people than any other industry in Alaska, accommodating about three quarters of the Kenai Peninsula's maritime economy. Generations of families have lived a life of fishing these waters and need hope their livelihood is sustainable during these economically troubling times. These fishermen of the Cook Inlet have been crying out for a fair and balanced management plan for many years. Closure of the EEZ by the Council would be a systematic rejection of the mandate to manage the fishery and would appear to be influenced by political pressure rather than people who truly care about good management.

Alternative 4 will likely put an end to commercial salmon fishing in Cook Inlet and therefore, it is imperative to the economy and way of life of my community for the Council to find a balance between all user groups in the Cook Inlet and create a sustainable Fishery Management Plan (FMP).

Respectfully,

A handwritten signature in black ink, appearing to read "Sarah Vance".

Representative Sarah Vance

CC: VIA ELECTRONIC TRANSMISSION

The Honorable Governor Michael J. Dunleavy

Ben Stevens, Chief of Staff to the Governor

Doug Vincent-Lang, Commissioner ADF&G

Alaska State Legislature

Leadership
Majority Whip

Chair
Fisheries Committee
Transportation Committee

Member
Rules Committee
Labor and Commerce Committee
Legislative Council
Judiciary Committee



REPRESENTATIVE LOUISE STUTES
Rep.Louise.Stutes@akleg.gov
House District 32
Kodiak-Cordova-Yakutat-Seldovia

Session:
Alaska State Capitol, #406
Juneau, AK 99801

Phone: (907) 465-2487
Fax: (907) 465-4956
Free: (800) 865-2487

Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872

Date: December 5th, 2020

To: North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

Re: Cook Inlet Salmon FMP

Dear Members of the North Pacific Fishery Management Council,

I am contacting you regarding the four alternative amendments to the Cook Inlet salmon FMP under consideration by the council and strongly urge you to adopt Alternative 2.

Frankly, Alternative 4 should be an option of last resort as it would result in most harm to commercial user groups without any perceived benefits over Alternative 2.

Although this letter falls outside of the deadline for written public comments, your consideration is greatly appreciated on behalf of my constituents and commercial user groups in Cook Inlet who are struggling to survive.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

Representative Louise Stutes
Chair, House Special Committee on Fisheries
Alaska State Legislature

Cc: The Honorable Mike Dunleavy, Governor, State of Alaska
Ben Stevens, Chief of Staff, Office of the Governor
Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game

North Pacific Fishery Management Council 1007 West
Third, Suite 400
Anchorage, Alaska 99501-2252

December 7, 2020,

Dear Members of the North Pacific Fishery Management Council,

I am contacting you on behalf of my constituents involved in the Upper Cook Inlet commercial salmon fisheries regarding the proposal to close the Exclusive Economic Zone (EEZ) as part of the Fishery Management Plan (FMP) for the area. It is my understanding you are considering this alternative at this week's meeting.

As you may know, this proposal is the cause of much consternation among Cook Inlet fishermen, who understandably believe its adoption would aid other user groups and curtail commercial salmon fishing in Cook Inlet in the process. I share these concerns and also question the lack of analysis and vetted process traditionally employed by the council. Respectfully, I request you do not adopt Alternative 4 in the FMP and consider an approach such as Alternative 2 that balances the species survival with the various user groups.

Although this letter falls outside of the deadline for written public comments, your consideration of this letter and my constituents is greatly appreciated.

Sincerely,

Senator Gary Stevens



14896 Kenai Spur Highway, Suite 103-A • Kenai, AK 99611
Phone: (907) 283-3335 • Fax: (907) 283-3913
www.kpedd.org

Leadership to enhance, foster and promote economic development

November 18, 2020

North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
Anchorage, AK 99501

Re: Support for the Cook Inlet Commercial Fishery

The Kenai Peninsula Economic Development District is a regional non-government agency tasked with economic development for the Kenai Peninsula Borough region. We work diligently to support the industries that make up our diverse economy and foster sustainable development projects. As you are likely aware, salmon is the major economic driver in the region's seafood industry, accounting for 85% of the total wholesale value. Our region, like many others, have also been deeply impacted by the COVID-19 pandemic, which has affected nearly every business on the Kenai Peninsula. Now is not the time to eliminate a critical industry in our communities.

As the Executive Director of the Kenai Peninsula Economic Development District, I urge you to eliminate Alternative 4 from the Cook Inlet Fishery management options. Alternative 4, closing of all federal waters in Cook Inlet to commercial fishing, would effectively close our fishery. We ask that you apply best management practices to the entire fishery.

If you have any questions, please don't hesitate to contact me. Thank you for your time and consideration.

Respectfully,

Tim Dill^{EA}
Executive Director
Kenai Peninsula Economic Development District
Tim@kpedd.org
907-242-9709



Alaska Regional Development Organization (ARDOR)
The State of Alaska Department of Commerce, Community
and Economic Development certified KPEDD as an
ARDOR in 1989.



Economic Development District (EDD)
The U.S. Department of Commerce, Economic
Development Administration (EDA) recognized KPEDD
as an Economic Development District in 1988.



UNITED FISHERMEN OF ALASKA

Mailing Address: PO Box 20229, Juneau AK 99802-0229

Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801

Phone: (907) 586-2820 Fax: (907) 463-2545

Email: ufa@ufafish.org Website: www.ufafish.org

November 25, 2020

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

RE: Support for Agenda Item C2 Alternative 2 and Opposition to Alternatives 3 and 4

Dear Chairman Kinneen and council members,

United Fishermen of Alaska (UFA) represents 39 fishing associations that are involved in fisheries throughout Alaska's state and federal waters. UFA believes one of the primary catalysts for Alaska's statehood was the management of salmon fisheries by the federal government before statehood. Since statehood, the State of Alaska has managed Alaska's Salmon fisheries far better than the federal government did before statehood. Federal regulatory processes moves slowly and the in-season management decisions necessitated by highly variable salmon runs just don't fit federal rule making.

UFA understands the court's directive is that MSA requires a Fisheries Management Plan (FMP) to continue the State's management of salmon captured in the federal waters of Cook Inlet. UFA notes that the court did not mandate the State of Alaska abdicate Cook Inlet salmon management to the federal government. Rather, it was anticipated that a FMP developed by the North Pacific Fisheries Management Council (NPFMC) confirm what should already be happening in Cook Inlet – that the State of Alaska's management of salmon within Cook Inlet's federal waters conformed to the broadly stated national standards of MSA.

The State of Alaska added Alternative 4 to the NPFMC's FMP amendment package which transfers management of salmon in the federal waters of Cook Inlet to the federal government and then closes those waters. While this may be a desired outcome for some Cook Inlet salmon stakeholders, it will substantially harm Cook Inlet commercial fishermen. Page 279 of the agenda item C2 Public Review draft states: "However, a number of factors may potentially make it difficult for vessels to fully offset the loss of access to the EEZ by increasing effort inside State waters.", and page 280 "As under Alternative 3, should Alternative 4 result in lower harvests by the UCI drift gillnet fleet, the harvests of other user groups, primarily Northern District and Upper Subdistrict set gillnet, Susitna and Matanuska river sport and personal use, and Kenai and Kasilof commercial set net and sport and personal use fishermen, could increase. Alternatively, overall levels of escapement could increase..."

Option 4 is not a benign action that would treat all Alaska stakeholders equitably. The analysis points out that it is highly likely that closing the EEZ waters of Cook Inlet will reallocate fish resources from the drift gillnet fishery to the other Cook Inlet user groups. It further indicates that the action is likely to increase escapement which is, in most years,

already above upper end goals. While the MSA does allow for reallocation, under national standard 4 there are criteria that must be considered in allocation decisions including that the allocation is “fair and equitable to all such fishermen...” UFA is unable to find the Council’s analysis regarding the allocative impacts of Alternative 4. Will it trim the drifter’s commercial catch by 5% or 95%? Will it be the tipping point to put Cook Inlet commercial drift fishermen out of business? Will the reallocation’s additional escapement result in a net loss of salmon in the entire fishery? How does increasing over-escapement align with National Standard (2) regarding using the best scientific information, which would be the escapement goals themselves?

National Standard 3 is also not addressed in the analysis. How does Alternative 4 align with “an individual fish stock shall be managed as a unit throughout its range, and integrated stocks of fish (like Cook Inlet Salmon) shall be managed as a unit or in close co-ordination”? NMFS has indicated that they will be unable to manage a commercial salmon fishery in federal waters in Cook Inlet. It isn’t “close co-ordination” when a fishery is just closed. And then, once federal waters in Cook Inlet are closed to commercial salmon fishing, NMFS will run “head on” into National Standard 1 which directs federal fishery managers to obtain “optimum yield” for each fishery. UFA doesn’t see anything in the analysis that would indicate how closing federal waters to commercial salmon fishing is managing the fishery for “optimum yield”.

On top of the potential economic harm that Alternative 4 would cause to the drift gillnet fleet, it would cause significant economic harm to communities and processors as well. One of the last remaining Cook Inlet processing companies commented that closing the EEZ would result in enough loss of fish landings that they would not be able to operate, which would result in a direct loss of fisheries business taxes to communities. It would also severely impact the set gillnet fleet by the loss of processors to sell their catch to. We do not see in the Public Review draft where the economic impacts to communities and the set gillnet fleets from the potential loss of processing capacity were analyzed in accordance to National Standard 8 guidance: “To the extent practicable, minimize adverse economic impacts on such communities.”

UFA encourages the Council to review the analysis and see that there are significant and substantive portions of the analysis missing if the Council were to choose Alternative 4. Said differently, UFA questions whether or not choosing Alternative 4 is legally viable given the current analysis.

Moreover, UFA believes that before choosing an option that transfers a portion of salmon management in Cook Inlet to the federal government, the State of Alaska must fully assess the precedents they will create. How will the State continue to manage salmon fisheries in federal waters in Prince William Sound and Area M if they transfer management in Cook Inlet? How will the state’s limited entry program apply to federal management of salmon in federal waters? Would federal management of salmon in federal waters allow for a wholly new salmon fishing fleet? UFA believes that once the State of Alaska steps away from the integrated management of Alaska salmon throughout its range, all manner of negative unintended consequences will follow. The only way to preserve Alaska’s meaningful and historic role of managing the state’s salmon resources is to establish its authority through the collaborative process under Alternative 2.

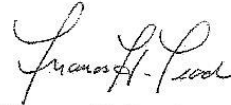
UFA applauds the state of Alaska for continually standing up for our rights to manage state resources, but would note that the adoption of Alternative 4 would fly in the face of this long standing tradition.

In summary, UFA supports alternative 2 with salmon management in the federal waters of Cook Inlet delegated to the state under an FMP. UFA, with the strongest possible advocacy, pleads with the State of Alaska and council members NOT to choose alternatives 3 or 4 and thereby initiate a continuing encroachment by the federal government in Alaska's fishery management.

Sincerely,



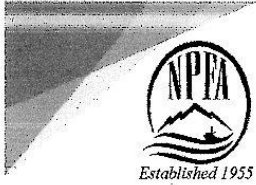
Matt Alward
President



Frances H. Leach
Executive Director

UFA MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association • Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn • Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest Sefnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association



North Pacific Fisheries Association, NPFA

P.O. Box 796 Homer, AK 99603

npfahomer@gmail.com

November 27, 2020

North Pacific Fishery Management Council
Re: Agenda Item C2 — Cook Inlet Salmon FMP

Dear Chairman Kinneen and Members of the Council:

The North Pacific Fisheries Association (NPFA) is a multi-gear group representing more than 65 commercial fishing vessels, their families and crew. Our members harvest a variety of species across Alaska, including salmon from Bristol Bay to Prince William Sound, and engage regularly in the important management processes impacting Alaskan salmon fisheries. Based in Homer, we have many members who participate in the Upper Cook Inlet Salmon Drift Fishery.

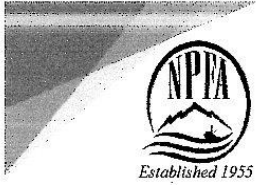
NPFA supports Alternative 2: Federal management of the commercial fishery in the EEZ with specific management measures delegated to the State.

Alaska has both a right and responsibility to manage its celebrated and valuable salmon resources, and it is vital that the state maintain that strong role. They are the best suited in infrastructure and expertise to do so, and we believe any challenges posed by collaborative management can be overcome through ongoing cooperation.

We are opposed to both Alternatives 3 and 4, which would delegate Cook Inlet's EEZ waters entirely to federal management. In the case of Alternative 3 we are concerned that the inherent challenges of federal management — given NMFS lack of infrastructure for managing salmon in Alaska — could lead to unnecessary closures or restrictions in an already struggling fishery. Alternative 4 would deliberately close fishing in the EEZ, and is extremely concerning.

Not only would this precedent be troubling for any salmon fishermen whose traditional fishing areas span both state and federal waters, this action poses immediate and long-term harm to the community of Homer. The EEZ area of the fishery has historically provided a substantial portion of the harvest, and the vast majority of landings directed to Homer. Closing the EEZ waters will not only substantially reduce fishing opportunity, it is likely to eliminate the incentive for vessels to operate out of Homer. Losing fishing activity from more than 100 vessels operating out of Homer during the Cook Inlet season will cause a substantial decline in annual landings and associated revenue to the city, a loss of processor activity on our working waterfront, and significant loss of revenue from fuel purchases, moorages and essential marine trades services. The current analysis does not incorporate the full effect that such a drastic change would have on the community of Homer, or other communities reliant on this fishery.

Additionally, NPFA recognizes that the original Salmon Fishery Management Plan for the Western Area does not include recreational fisheries. Thus, the Council has chosen to focus the Alternatives for this action only on commercial fisheries. The result is, that regardless of the outcomes of this action, the state will still independently manage recreational fisheries in the EEZ. While this is technically consistent, it is far from equitable, and the nature of these alternatives mean that such a distinction is extremely relevant to the decision.



North Pacific Fisheries Association, NPFA

P.O. Box 796 Homer, AK 99603

npfahomer@gmail.com

If the Council chooses Alternative 4, it creates a profound inequity between two of the primary user groups that share Cook Inlet. It eliminates access for one, and maintains access for another, in a decision that has not been fully analyzed for allocative consequences. While the analysis does acknowledge that loss of access for the commercial fleet will result in additional escapement and access for the recreational fleet, which suggests an allocative consequence, it is not quantified or analyzed, nor are their recommendations to mitigate the impacts of that allocative decision. Or the larger one implied by continued state management of EEZ recreational fisheries.

An Alternative 4 pathway not only creates an inequity in access, it eliminates commercial stakeholders from the public process that will still govern recreational users in these same waters. Essentially, recreational users will have the right to go before the State of Alaska and the Board of Fisheries to participate in a public process determining the fishing future of the Cook Inlet EEZ. At the same time, their commercial fishing neighbors will be permanently excluded from that same right in those same waters, under the premise that the EEZ is under federal management. It is impossible to ignore the profound inequity that creates.

For these reasons, we ask that you support Alternative 2, collaborative management between state and federal entities. Thank you for this opportunity to comment.

Sincerely,

Malcolm Milne, NPFA President



40610 Kalifornsky Beach Road, Kenai, AK 99611

907-283-5761 907-283-9433
info@ciaanet.org www.ciaanet.org

November 25, 2020

North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
Anchorage, AK 99501

Re: Opposition to Alternative #4

Cook Inlet Aquaculture Association is a regional non-profit 501(c)(3) organization organized in 1976 under the laws of the State of Alaska that engages in salmon enhancement and habitat work throughout the Cook Inlet region.

Alternative #4 would close all federal waters in Cook Inlet to commercial fishing. Essentially ending all commercial fishing in the EEZ with a devastating impact to a commercial salmon fishery that has been a backbone of the economy for over six decades. This economic impact will reach far beyond the individual commercial fishing stakeholder to impact local economies that support commercial fishing.

With few exceptions all impacted entities are small businesses. Local economies cannot exist without a strong and vibrant small business community providing jobs and revenue through the downstream economic contributions of commercial fishing. When individual small businesses suffer economically the community suffers with reduced revenues to other small businesses in the community and reduced contributions to the local tax base of the municipalities.

Alternative #4 does not conform to the Magnuson-Stevens Act (MSA), the late introduction of an alternative to not manage is an abdication of responsibility which ignores the intent of the Ninth Circuit ruling.

Of the four alternatives under consideration a modified Alternative #2 that calls for joint management of a legal FMP compliant with MSA and the Ten National Standards that considers the intent of the Ninth Circuit ruling should be adopted.

Respectfully,

Dean Day Executive
Director
Cook Inlet Aquaculture Association



VIA ONLINE PORTAL
(<https://meetings.npfmc.org/Meeting/Details/1745>)

November 19, 2020

North Pacific Fishery Management
Council 1007 West Third Avenue, Suite
400
Anchorage, Alaska

99501 Dear NPFMC:

Cook Inletkeeper is a community-based organization created by Cook Inlet fishermen and others in 1995 to protect the Cook Inlet watershed and the life it sustains. Please accept these brief comments on the proposed Cook Inlet salmon FMP.

Inletkeeper is surprised and disappointed the State of Alaska representatives introduced Alternative 4 so late in the process to develop an FMP for the Cook Inlet salmon fishery. Alternative 4 would effectively shut-down commercial salmon fishing in Cook Inlet, with devastating impacts to local families and communities. Alternative 4 reflects a hyper-politicized, anti-commercial fishing perspective from the Dunleavy Administration, and it should be rejected outright.

Instead, the NPFMC should adopt a modified version of Alternative 2 which embraces science and the ten national standards under the Magnuson-Stevens Act.

Thank you for your attention to this matter. Inletkeeper truly hopes you do not breath legitimacy into the process and the substance surrounding Alternative 4.

Yours for Cook Inlet,

A handwritten signature in black ink, appearing to read "Bob Shavelson".

Bob
Shavelson
Inletkeeper



November 25, 2020

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

RE: Opposition to Agenda Item C2 Alternative 4

Dear Chairman Kinneen and council members,

Homer Marine Trades Association (HMTA) represents over 90 businesses located in the greater Homer area that serve the maritime industry. HMTA's primary focus is collectively promoting our businesses and supporting vocational education and training, and we purposefully do not get involved in fisheries policy. However, we feel that the economic damage that Alternative 4 would cause to the Homer community demands our involvement.

There are around 152 Cook Inlet drift permits owned by residents of the greater Homer area. Most of the vessels that those active permits fish on are ported in Homer, where all their maintenance, upgrades and fueling take place. Under the current state management regulations, the federal waters portion of Cook Inlet has openers that occur from the beginning of the season till at least July 9th and sometimes later. During these openers, the Homer fleet as well as a portion of the Kasilof and Kenai fleets fish then return to Homer to deliver their catch, berth their vessels and get fuel and supplies. In this early portion of the season Homer receives a large portion of the landings. If the Council gives management authority to the federal government and closes the federal waters, most of those landings that traditionally come to Homer will instead go to Kasilof or Kenai. That loss of processor activity means a decline in local economic activity and a decline in direct landings revenues to the city. A large portion if not most of the Homer fleet would be likely to base entirely out of northern ports, causing a sharp decline in moorage revenues, fuel purchases and other in-season services our marine trades businesses provide. The result will be a large economic loss to the city of Homer and the businesses that serve the Cook Inlet fleet, a loss that is certain to have rippling impacts in our community if Homer's access to this resource is eliminated and remaining efforts shift north.

HMTA recognizes that this action is on a fast track due to a court order, but with the very recent addition of Alternative 4 at the October meeting, the Cook Inlet Salmon Public Review Draft

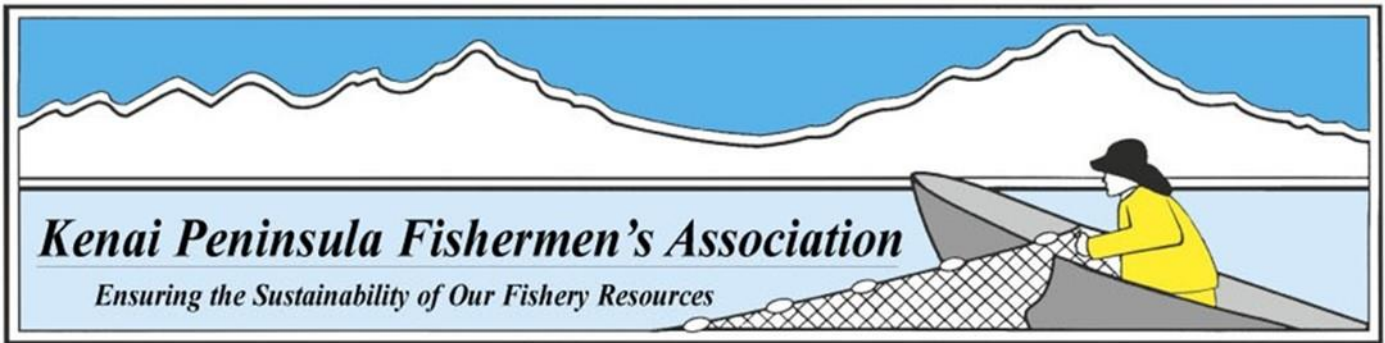
completely without a proper economic impact analysis, it will be impossible to consider national standard 8 criteria to provide for the sustained participation of such communities; and to the extent practicable, minimize adverse economic impacts on such communities. Figures 4-38 and 4-39 in the Public Review Draft show the volume and value of the drift fleet catch landed in Homer. Under Alternative 4 most of that value will shift to other ports causing significant economic and social harm to the community of Homer.

We want to emphasize that it is HMTA's practice to stay out of fishery policy issues, but we were left with no choice but to advocate for all our business members who will suffer harm under Alternative 4. We respectfully ask that you consider the economic impacts to the community of Homer and do not pass Alternative 4 under agenda item C2.

Respectively,

Mark Zeiset

President-Homer Marine Trades Association



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276
(907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

November 24, 2020

Chairman Kinneen and members of the North Pacific Fishery Management Council,

We are the board of directors of the Kenai Peninsula Fishermen's Association (KPFA), a non-profit 501(c) (6) commercial fisheries advocacy trade group representing Cook Inlet (CI) fishing families since 1954.

KPFA's mission is "Ensuring the Sustainability of Our Fishery Resources". Our goal is to continue to strengthen our fishing community and to promote the economic stability of the Cook Inlet Setnet Fishery.

KPFA primarily represents salmon set net permit holders on the East Side of Cook Inlet. The geographical area of the fishery reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the East Side Setnet Fishery originate almost exclusively in the Kasilof and Kenai river systems. Some 440 limited entry permit holders, each small business persons, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents).

We are writing today because we're deeply concerned that the North Pacific Fishery Management Council would even consider Option 4 as a viable resolution to UCIDA's successful lawsuit, and the 9th Circuit Court's order to work with stakeholders to craft a fair resolution to their complaint. Option 4, which would close the Exclusive Economic Zone in Cook Inlet to fishing, is not a solution, it is an abdication of the responsibility you took on when you accepted your positions as members of the Council.

Option 4 does not conform to the Magnuson Stevens Act's National Standards, which must be followed to ensure sustainability and responsible fishery management.

- Option 4 violates **National Standard 1-Optimum Yield** because it does not achieve optimum yield.

- Option 4 violates **National Standard 2-Scientific Information** because it is not based on "the best scientific information available" as required by MSA. No scientific data has been presented in support of option 4.

Option 4 violates **National Standard 3-Management Units** because "an individual fish stock

shall be managed as a unit throughout its range, and integrated stocks of fish shall be managed as a unit or in *close co-ordination*". Closing the EEZ to commercial fishing makes it impossible to manage Cook Inlet's integrated salmon stocks in "close co-ordination". Option 4 is not a deliberate distribution of opportunity, it's a politically motivated, intentional effort to close a longstanding successful fishery and reallocate the resource with disregard for the impacts on stakeholders and the fishing communities in which they live.

- Most significantly, Option 4 violates **National Standard 8-Communities**. The fact that Option 4 is even under consideration warrants spelling out the standard here in its entirety:

"Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirement of paragraph (2) [i.e., National Standard 2], in order to (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities."

Option 4 flies in the face of National Standard 8 which stipulates that NPFMC actions "*minimize adverse economic impacts*" on fishing communities. If Option 4 is passed, fish processors which are significant economic drivers for the communities of Upper Cook Inlet will be crippled due to the drift fleet's inability to harvest its historical portion of the inlet's salmon. The Cook Inlet setnet fishery also will suffer collateral damage and go out of business if the region's seafood processors close.

The overall impact of the loss of the seafood harvesting and processing industries in Cook Inlet would devastate its fishing communities through the loss of tax income as well as killing jobs currently held by fishermen, seafood processors, truck drivers, ocean shipping companies, fuel distributors, fishing gear dealers, boat builders, mechanics, and scores of other business people whose livelihoods depend on a robust seafood industry in Upper Cook Inlet.

In conclusion, Option 4 ignores the intent of the ruling by the 9th Circuit, it fails to comply with several of the national standards that guide the council's actions under the Magnuson Stevens Act, and will likely be rejected by the court if chosen. Option 2, while not perfect, was crafted intentionally, is supported by science, and generally adheres to the national standards that Option 4 does not.

On behalf of the hundreds of commercial fishing families that make their livings from the bounty of Cook Inlet's salmon runs, we urge you to choose Option 2 and keep Cook Inlet's century-old commercial fisheries alive, and its seafood processing sector thriving and contributing to the economies of the Kenai Peninsula and the State of Alaska.

Sincerely

The KPFA board of directors

Andy Hall, Ken Coleman, Lisa Gabriel, Sarah Frostad-Hudkins, Travis Every, Joel Doner, Paul Shadura, Ted Crookston, Eric Nyce

Matt Haakenson
Pacific Star Seafoods
11/23/2020

This comment is submitted on behalf of Pacific Star Seafoods and its parent company, E&E Foods. As a major buyer of Upper Cook Inlet salmon, we strongly oppose the closure of the Exclusive Economic Zone.

In its development of a Fishery Management Plan for the area, the North Pacific Fishery Management Council identified four alternative options. Alternative 4 would close the EEZ permanently, ending the commercial fishery that has thrived for generations. Doing so would be contrary to the Magnussen-Stevens Fishery Management and Conservation Act, and to the very purpose for which the FMP is to be written. If Alternative 4 is adopted, it would bring with it the closure of our processing facility in Kenai, which employs hundreds of people. Competing businesses and support industries would be similarly affected.

Boat owners, permit holders, crew members, and their families would suffer significantly by a closure of the EEZ. Being unable to harvest the available surplus of salmon which Cook Inlet's river systems produce, would not only hurt local businesses and economy, it would also reduce the nation's food supply and increase its trade deficit.

The effects of a complete closure of the EEZ in Upper Cook Inlet go beyond the local salmon fishery. For instance, our business also processes salmon from Lower Cook Inlet, Bristol Bay, and Kotzebue. We purchase and process halibut, sablefish, Pacific cod, eulachon, and tanner crab at our Kenai facility, as well. The closure of this facility would affect these other fisheries, reducing competition and processing capacity, resulting in lower value for these species, dockside. A closure of the EEZ in this fishery would set a precedent, and will have far-reaching implications and ramifications in other fisheries.

In making this decision, it is important that we understand why the EEZ is what it is to the fishery. Cook Inlet has the second biggest tides in the world, second only to the Bay of Fundy, in Eastern Canada. In roughly six hours, the tides here vary vertically by as much as thirty feet. This cycle continues, day in, day out. On the incoming tide, the strongest currents push northward up the middle of the inlet, the EEZ, bringing a surge of fish. During the ebb, the current near shore flows slower than in the deeper water, and more salmon swim in these eddies and slower currents to keep from losing ground. The fish will commonly overshoot the rivers, as the strong tides push them from south to north, then let the ebb carry them back to the river mouth, alongshore, to enter their natal stream on the next incoming tide. For the commercial drift gillnet fleet, fishing near shore is not an option. Besides the obvious perils of rocks and other navigational hazards, coupled with strong currents, state regulations prohibit drift gillnetting near shore, within one to two miles of shore, depending on circumstances and area.

The specific details of these restrictions are in Article 3, on pages 11 and 12 of the 2020- 2022 Cook Inlet Area Commercial Salmon Fishing Regulations [5 AAC 21.310 (b) (3) (A) through (C)]. In understanding these facts, it is clear that the only real opportunity for the drift gillnet fleet to harvest salmon exists only in the EEZ. Harvest data supports this finding. In 2020, the drift harvest in the Kasilof Section, inshore and exclusive from the EEZ, was 18 deliveries for a total of 328 fish, from multiple openings. That is the season total. The biggest daily harvest in the area was 164 fish from 8 deliveries on June 30, 2020. With an average weight of five pounds, we ascertain that the boat

average on the best day outside the EEZ was 100 pounds, total. This, with virtually no competition from the fleet, as most of them understandably decided not to fish those openings. Compare that harvest to the nearly 650,000 salmon that the drift fleet caught during openings in areas which include the EEZ, and you start to realize the importance of the area to the fishery. You can find the 2020 harvest data at:

https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareauci.salmon_harvest

The history of the commercial salmon fishery in what we now know as the Exclusive Economic Zone of Upper Cook Inlet is well-documented and readily available. The fact that the commercial fishery has existed for over one hundred years, with forty-five years in its current form of limited entry, shows its sustainability. Escapement goals in the major rivers, the Kenai and Kasilof, have been studied and lauded for their sound scientific basis. These escapement goals have routinely been exceeded in recent decades, showing conclusively that there is not a conservation concern for the fish that are harvested in the EEZ. Rather, it indicates that there is greater potential for commercial harvest than has recently been allowed, resulting in foregone harvest, economic loss, and a heavier load on the ecosystems into which the fish are hatched.

To remain a viable, effective, productive industry, it is of utmost importance that the EEZ be not only utilized, but effectively managed to allow for efficient harvest and maximum sustained yield.

We are opposed to Alternative 4, the closure of the EEZ in Upper Cook Inlet, and support Alternative 2 as the best option for sound management of the fishery.

VIA ONLINE PORTAL



North Pacific Fishery Management Council
2020 1007 West Third Avenue, Suite 400
Anchorage, Alaska 99501

November 27,

<https://meetings.npfmc.org/Meeting/Details/1745>

Dear North Pacific Fishery Management Council:

SalmonState submits the following comments on the proposed C2 Cook Inlet Salmon Final Action for the Fishery Management Plan for Salmon Fisheries in the EEZ, dated December 2020. SalmonState opposes the adoption of "Alternative 4: Federal management of the commercial fishery in the EEZ with the EEZ closed to commercial fishing" by NPFMC.

SalmonState is a nonprofit organization working to protect salmon habitat and promote policies that will guarantee Alaska remains home to the world's largest, healthiest and most abundant wild salmon resource, which provides culture, food, income, employment, and recreation to Alaskans, Americans, and the rest of the world. SalmonState is a project of New Venture Fund, which is a non-profit that supports effective public interest projects.

The proposed Alternative 4 would eliminate access to commercial harvest of salmon within Cook Inlet federal waters. This prohibition of commercial harvest would adversely impact Cook Inlet communities by eliminating a major economic driver to the region. The coastal communities of Cook Inlet thrive from an active commercial fishing fleet, and the closure of such an industry will devastate those communities. These communities rely on owners and crew of the commercial fishing fleet to fill the harbor with vessels, provide business to supporting industries, and support local establishments and organizations.

Furthermore, closure and regulatory decisions for the Cook Inlet salmon fishery should be made by regulatory bodies delegated that authority and based on sound science and those ten standards set forth in the Magnuson-Stevens Fishery Conservation and Management Act. Alternative 4 is not an appropriate approach to regulation of the commercial salmon fishery in Cook Inlet. The State of Alaska has a long history of management of commercial salmon fishery and should retain the authority previously delegated. Alternative 2 allows NMFS and the State of Alaska to appropriately manage the commercial Cook Inlet salmon fishery in a manner that is based on science and consistent with the MSA. Alternative 2 should be adopted by the Council.

Thank you for your consideration of these
comments. Sincerely,

Tim Bristol, Executive Director

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

Georgie Heaverley 2201
Sunrise Drive
Anchorage, AK 99508

November 27, 2020

North Pacific Fishery Management Council 605 W.
4th Ave, Suite 400
Anchorage, AK 99501

Members of the North Pacific Fishery Management Council,

Thank you for the opportunity to provide comment on agenda item C2 - Cook Inlet Salmon FMP Final Action.

As a member of the Cook Inlet Salmon FMP Committee, I spent a great deal of time and energy reviewing reports and documents in order to provide staff and Council an informed perspective into the Cook Inlet commercial fishery my family has participated in for over 50 years. As a Committee, Alternative 2 was overwhelmingly supported. It is frustrating and unfortunate that our Committee did not have the opportunity to provide input regarding Alternative 4. This Alternative is drastically different from everything the committee considered and commented on, and disregards the hours we spent working toward a pathway for collaborative management.

As you can clearly see, the multitude of comments submitted from Cook Inlet commercial fishermen show a genuine and passionate account of the longstanding history and defining culture of the Cook Inlet fishery. Participation in this fishery spans four and even five generations, over time weaving a deep-rooted identity into the fabric of what makes us all Alaskans. The fishery, as strongly expressed by the FMP Committee and stakeholders, has been plagued with political discord for decades, slowly eroding the opportunity and viability of the fishery for the Alaskans that rely on it. This political motivation has culminated in proposals such as Alternative 4, which seeks to utterly destroy the industry; the nail in the coffin if you will.

I urge you as Council members to reject Alternative 4 and support Alternative 2. Alternative 2 is what our Committee recommended; it is what stakeholders are pleading with you to move forward with.

Sincerely,
Georgie Heaverley
Cook Inlet Salmon FMP Committee Member

Matthew Alward
60082 Clarice Way
Homer, AK 99603

11/25/2020

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

RE: Support for Agenda Item C2 Alternative 2 and Opposition to Alternatives 3 and 4

Dear Chairman Kinneen and council members, I want to thank the council members for the opportunity to comment on agenda item C2. I am a commercial fisherman from Homer who has raised my family on the back deck of our fishing boat, and I support alternative 2 for the Cook Inlet salmon fisheries management plan (FMP) amendment and oppose alternatives 3 and 4.

While I do not fish in upper Cook Inlet, I do strongly value and support the states' right and responsibility to manage all salmon fisheries in all waters. Alaska became a state largely for the purpose of taking over management of salmon from the federal government. I do not see any circumstances that can justify the state giving up management authority of salmon in any waters. While I understand that alternative 2 would set up a plan team that reviews the management regulations and escapement goals which would add cost to the state for management of the Cook Inlet drift fishery, I contend that is not a valid excuse to give up management authority to the federal government or to close a fishery that has been prosecuted for over a century.

According to the executive summary of the Public Review Draft for item C2 page 3, "The FMP also recognizes that the State is the authority best suited for managing Alaska salmon fisheries given the State's existing infrastructure and expertise." The fact that the councils' analysis and current FMP confirms that the state is the best authority to manage Alaska salmon fisheries gives support to Alternative 2 as the preferred alternative.

Alternative 4 would give management authority to the federal government and then close the fishery in the EEZ. Page 279 of the Public Review draft states: "However, a number of factors may potentially make it difficult for vessels to fully offset the loss of access to the EEZ by increasing effort inside State waters.", and page 280 "As under Alternative 3, should Alternative 4 result in lower harvests by the UCI drift gillnet fleet, the harvests of other user groups, primarily Northern District and Upper Subdistrict set gillnet, Susitna and Matanuska river sport and personal use, and Kenai and Kasilof commercial set net and sport and personal use fishermen, could increase. Alternatively, overall levels of escapement could increase..." According to the council's analysis closing the federal waters of Cook Inlet could cause substantial allocation shifts between the user groups, cause a loss of commercial fish landings harming the commercial fishermen and processors, cause economic harm to communities and shoreside support businesses, and could result in increased escapement on top of a recent history of escapements already over the upper end goals.

Under the Magnuson-Stevens Act (MSA) reallocation between user groups is allowed, but National standard 4 says that it must be "fair and equitable to all such fishermen." While the Public Review Draft does state that under Alternative 4 there will most likely be a reallocation from the drift gillnet fishery to the set gillnet, sport, and personal use fisheries, it does not give any analysis of the impacts that allocation shift could cause. Without any

analysis of these impacts I do not see how you could determine if Alternative 4 would be fair and equitable.

National standard 1 demands that conservation and management measures shall achieve optimum yield. I have not found anywhere in the public review draft where there is analysis of how closing the EEZ, which was shown could cause increased escapement, would obtain optimum yield. If anything, Alternative 4 would result in a greater loss of yield which is the opposite of optimum yield. National standard 2 requires that Conservation and management measures shall be based upon the best scientific information available. I would argue that the escapement goals are themselves the best available science for salmon management. Alternative 4, according to the Public Review Draft, would disregard the escapement goals and is not based upon the best available science.

Closing the traditional fishing area in the EEZ would result in a majority of the Homer area fleet moving to ports up the Peninsula resulting in a loss of landings, vessel moorage and support side business to the city of Homer, causing significant economic harm to the community. The Public Review Draft does not have any analysis of the potential impacts to the community of Homer but Figures 4-38 and 4-39 do show the volume and value of the drift fleet landings to the city of Homer. The passing of Alternative 4 would cause most of that value to shift to other ports. Without any analysis of those impacts it is impossible to weigh the economic cause and effect to local communities as is required under national standard 8.

I want to emphasize that a big factor in Alaska's statehood was to take control of the salmon fisheries from the federal government and I strongly believe that Alaska must not give up any salmon management authority for any reason. Given that most of the committee and council record on amending the salmon FMP to include the federal waters of Cook Inlet supports delegated management to the state under the FMP and the lack of comprehensive analysis of Alternative 4 in regard to multiple National Standards, I respectfully ask that you adopt Alternative 2.

Respectively, Matthew Alward
Owner-Alward Fisheries LLC

November 27, 2020

North Pacific Fishery Management Council RE: Agenda
Item C4 - Cook Inlet SalmonFMP

Dear Chairman Kineen and Members of the Council:

My name is Revelle Russell, I am a permit and vessel owner and have drifted Upper Cook Inlet since 2009. I have commercial fished in Alaska since 1994. In fact, my first job in Alaska was a deckhand in the Upper Cook Inlet. I also longline halibut and I am a IFQ owner.

The Council needs to understand that by choosing Alternative 4, and closing the EEZ, you will be killing this fishery.

It is interesting that I purchased both my permit and fishing vessel through the State of Alaska's Division of Economic Development loan program, but the State management of this fishery makes it harder and harder for me to make my loan payments each year. Most lending institutions, want their borrowers to be successful. The state has made it impossible for me to be successful.

Directly contrary to National Standard 8 of Magnuson-Stevens Act, Alternative 4, would have negative economic impacts on the coastal communities of Cook Inlet, especially Homer. Typically 70 to 100 boats deliver EEZ caught fish into Homer. This represents 70-100 small businesses that will be shut down.

If you ever been to the Homer Harbor before a salmon opener, you will see boats getting fuel, getting ice, using the cranes and ramps to load gear, crews loading groceries and supplies. You will see after an opener, boats waiting in line to deliver. This will all go away.

The ramifications of closing this fishery will not only be felt by our families and communities but will impact other fisheries. Many, like myself, out of economic necessity, will move to a different fishery, driving up permit prices, maxing out other fisheries. This will make it harder for new entrants into the industry. One less fishery means less diversity, one less fishery to move to if one fails, and more consolidation of the industry.

I also have concerns over the Council's focus on the Commercial fishery and not the Recreational fishery in Alternative 4. How can the State manage the recreational fishery in the EEZ but not the Commercial? Is the State favoring one user group over another?

I understand the Council usually does what the Commissioner and State wants. However, in this case the Council must recognize the blatant political motivation. The current State administration wants this fishery to go away. Under a different administration, Alternative 4 would not even be up for discussion.

The Upper Cook Inlet Fleet, both drift and set, and the coastal communities that depend on this fishery are counting on you.

You can do this by choosing Alternative 2. Federal Management of the commercial fishery in the EEZ with specific measures delegated to the State. Thank You.

November 27, 2020

North Pacific Fishery Management Council Re:
Agenda Item C2 — Cook Inlet Salmon

Chairman Kinneen and Members of the Council:

I am a Cook Inlet drift fisherman from Homer, Alaska. My family has fished Cook Inlet for three generations, and I am one of five family members that are owner-operators in the Cook Inlet Drift salmon fishery. Thank you for this opportunity to comment on the Cook Inlet Salmon FMP Amendment.

I believe fundamentally in Alaska's leading right and responsibility to manage the entirety of this state's robust and diverse salmon fisheries for the benefit of all of its diverse users. Considering that constitutional responsibility, and considering the requirements laid out in both Magnuson and the court ruling impacting this issue, I believe the only path forward is Alternative 2, collaborative state and federal management.

This is the only option that leads toward a functional commercial fishery in Cook Inlet. Under Alternative 3, the inherent challenges of federal-only management are likely to result in the partial or full closure of fishing in the EEZ, which is an essential part of the fishery and an access point for southern communities. NMFS clearly lacks the infrastructure and expertise to manage a salmon fishery in Alaska at this time, and it is difficult to envision a course in which the fishery remains open under Alternative 3. Alternative 4 closes it outright, which is similarly untenable.

The Council, the AP, the SSC and the Salmon FMP Committee, with consistent participation from state representatives, have spent the last 2 years reviewing considerations for Alternatives 2 and 3, and from my point of view as a participant in every single Council-related meeting addressing this issue, the clear emphasis has been on Alternative 2. Even where there is disagreement on fundamental components of program design, there is still widespread agreement that Alternative 2 is the right path. You see that reflected in the substantial emphatic public comments submitted under this item. This is one of the reasons that the inclusion of Alternative 4 at this late stage was such a surprise and a departure. Though perhaps it gives us an opportunity to look at the potential impacts of such a drastic change.

Not only would closure and grounds elimination be a troubling precedent for any salmon fishermen whose fishing areas span both state and federal waters, this action poses immediate and long-term harm to the community of Homer. The EEZ has historically provided a substantial portion of the harvest, with a large portion of the landings directed to Homer due to its southern proximity to the EEZ portion of the fishery. Closure would result in not just loss of fishing opportunity for the hundreds of captains and crew who live in Homer, it completely removes the incentive for vessels to operate out of Homer, as they have been doing for more than a century. Homer can expect to see a substantial decline in annual landings and associated revenue to the city, a loss of processor activity on our working waterfront, and significant loss of revenue from fuel purchases, moorages and essential marine trades services as more than 100 vessels are driven north — if they can still operate at all. The analysis does not review the full effect that such a drastic change would have on the community of Homer, or other communities that rely on this fishery.

I would also like to comment on the decision at the October meeting to add the language "commercial fishing" to all of the alternatives. The original Salmon Fishery Management Plan for the Western Area didn't include recreational fisheries, so it is perhaps superficially consistent for the Council to focus the Alternatives for this action only on commercial fisheries. However, the execution of that, considering the

options on the table, results in a drastic change to equity between sectors. This is because regardless of the alternative chosen, the state will still independently manage recreational fisheries in the EEZ.

If the Council chooses Alternative 4, it creates a profound inequity between commercial and recreational fishermen sharing this resource. It eliminates access for one, and maintains access for another, the allocative consequences and implications of which have not been analyzed.

This direction not only creates an inequity in access to the resource, just as importantly it eliminates commercial stakeholders from the public process that will still govern their neighbors in the recreational fishery. Going forward, recreational users would have the right to work with the State of Alaska and the Board of Fisheries as stakeholders in a public process determining the fishing future of the Cook Inlet EEZ. At the same time, commercial fishermen from the same communities that have a century-old history on these fishing grounds will be permanently excluded from that right, under the premise that the EEZ is under federal management. We cannot ignore that profound inequity, and the fact that it permanently awards public resource rights to one portion of a community and removes it for another.

Related to that concern, is that part of the challenge of finding a path forward on this issue has been the deeply contentious history between user groups who rely upon Cook Inlet. The political and allocative tensions in Cook Inlet are exhausting. That being said, we must remain collectively dedicated to improving our public processes and public discourse. Our solution to that contention cannot be eliminating an entire stakeholder group, at great cost to our coastal economies and cultures. That is the clear messages from our community leaders, marine business leaders, local residents and our fishermen.

Potential closure is an unacceptable outcome for the state of Alaska, which has long been committed to managing its salmon resources, and does so for the benefit of our coastal economies and food systems — of which Cook Inlet commercial fishing businesses are an integral part. State and federal laws require us to manage these resources for economic, cultural and ecological vitality. Options that have the potential to eliminate EEZ fishing opportunities do not accomplish that, and would decimate an already struggling commercial fishery. Recognizing that risk, it is vital that the Council choose a path forward that leads to a functioning fishery and a public process that can incorporate both state and federal waters, and all of Cook Inlet's stakeholders.

I urge the Council to choose Alternative 2.

Regards,
Hannah Heimbuch

My name is Matt Oxford I have been a commercial fisherman living in Fritz Creek, Alaska since I moved here in 1989. I was a crabber for years and also worked the derby openings for halibut and seined for salmon and herring. I helped start Coal Pt Trading in Homer and skippered the overnight halibut charter for 8 summers. I started fishing in the cook inlet drift fishery with my 3 sons in 2005.

The cook inlet salmon fishery is the only fishery that I know of that is willing to underperform economically to push forward a political agenda. The fishery has supported over a thousand small commercial fishing businesses since the permitting process. I don't recall any sport fishing businesses going broke because of the impact the long-established commercial fishery is having on them. The salmon don't really care who donated to whose campaign or who gets to keep their appointed spot on which committee. The fisheries in the upper cook inlet are the goose that lays the golden egg. They can sustain all user groups but only if we use science to oversee these fisheries.

I support OPTION 2, with oversight that keeps the national standards. I think the question for the board is what can federal management do along with cooperation and expertise from the state to assure that we get the most value out of one of the last great wild salmon runs in the world. The threat of closing down the federal waters was made at the first meeting I attended and has resurfaced as Option 4. What would the point be to that? How could that maximize the economic potential of this fishery? How will that use of the federal fishery waters help the economies of those small communities that have historically utilized the resources from that area in the inlet.

Is it the councils plan to write an FMP that puts 500 small drift boat operations out of business because they think the court of appeals got it wrong? These are small businesses! If someone came to town with a proposal to start 500 small businesses owned by Alaska residents that are going to own boats and property, hire locally ,raise their kids here and pay taxes. The state would be giving all sorts of incentives to lure them to the peninsula. Instead we are allowing those already existing 500 small drift boat operations to be starved out of existence.

I have gotten to know most of the NPFMC salmon committee members during the meeting process, I'd like to thank them for their work on this issue. I hope the council chooses a path that allows an optimum yield of all the salmon species to occur while maintaining balance between the user groups.

The only viable path is OPTION 2.

Thanks, Matt

Oxford

Po 15201 Fritz

Creek Alaska

99603

907-299-0730

Colette Choate
F/V Contender
11/27/2020 04:59 PM AKST

This letter expresses my strong opposition to Option 4. As a current Cook Inlet permit holder Option 4 would decimate the fishery I have invested heavily in over the past several years, turning what are currently assets into paper weights and fire starters. As the daughter of a Cook Inlet fisherman, Option 4 would break a multigenerational legacy.

My father began fishing in the Inlet nearly a half century ago, teaching me his trade along with the values that made him a highliner: perseverance, creativity, resilience, and adaptability. After participating in fisheries all over the state, I returned to the Inlet to teach my own children to fish in one of the only fisheries located close to where families live. My stepson is now a fisherman in Bristol Bay. My 3 year old daughter is just learning how to sort fish. As a Homer resident, Option 4 would have an enormous negative economic impact on the community I was born and raised in, both directly and indirectly. Homer is, after all, a fishing community, so destroying one of the fisheries would impact both the private and public sectors at a time when the economic impacts from the pandemic have already plunged the economy into uncertainty.

As an Alaskan, Option 4 would directly contradict the motto many of our state politicians have adopted during our current recession: "We are open for business." If Alaska is truly open for business, then decisions about every industry should be deliberate, science-based, and follow a reasonable public process. Please dismiss Option 4 and consider Option 2. Thank you.

Krista Timlin
community member
11/27/2020 04:54 PM AKST

Dating back to my childhood in the 1970s, I have a history of having benefitted from the salmon of the Cook Inlet watershed as a participant within several different "user groups"--including individual sport angling, commercial processing, personal use, and commercial driftnet fishing. I sincerely appreciate the sustenance I've experienced through my access to this bountiful and important resource on the Kenai Peninsula.

Cook Inlet salmon fisheries management has been most effective over time when it has been guided by the Magnuson-Stevens Act's tenets, with maximum sustainable yield for all user groups. Unfortunately, in recent years some well-moneyed commercial owners of large sport fishing guide endeavors have thrown their financial weight around to enable their disproportionate influence on the State of Alaska's approach to salmon fisheries management in Cook Inlet. Rather than focusing on the best outcome for all user groups, these players have focused on penalizing their perceived enemies: the commercial drift fleet and set-net fisherman of Cook Inlet.

The last minute addition of Alternative 4 as a potential option for managing the federal waters of Cook Inlet is an unethical huge leap in the direction of disaster for the commercial drift fleet, other businesses and residents who depend on the fleet's catch, and ultimately all other user groups. Please throw out Alternative 4, and focus on developing the best version of Alternative 2 that will work toward the greatest benefit for all user groups.

Brian Ritchie
Solstice Charters
11/27/2020 04:47 PM AKST

Chair Kinneen, I am a charter owner/operator in Homer, sit on the board of the Homer Charter Association (HCA), and last May I finished my Master's degree at APU in Environmental Science focused on Fisheries. I was born and raised in Homer, and my family has been in the marine trades here since the 1970s. Growing up in Homer and on the Kenai Peninsula, I always felt lucky to have exposure

to two great sectors of fishing, both sport and commercial. As an active fisher, community member, and practicing member of the scientific community I ask that the council please reject Alternative 4 of this action, and please adopt Alternative 2. Our fishing communities depend on multiple sectors to thrive, and I am concerned Alternative 4 would be devastating to dependent local economies, Alaskan fishers, and their communities. Thank you, Brian Ritchie

Spiridon A Martushoff
F/V MARTUSHOFF
11/27/2020 04:36 PM AKST

Hi, I'm Spiridon Martushoff, long time Cook Inlet commercial fisherman..I request that you do not consider the unvetted alternative 4, but approve alternative 2. For the sake of COOK INLET salmon resources...thank you.

Nilla Kalugin
11/27/2020 04:33 PM AKST

Alternative 4 should not be an alternative. If you take away the Cook Inlet fishery, you are taking away hundreds of jobs. Hundreds of futures and livelihoods depend on the Cook Inlet fishery. Closing down the fishery is absolutely unnecessary. We just need a better management system to restore Cook Inlet to the fishery it once was. Please consider alternative 2 instead. Thank you.

Jordan Cameron
11/27/2020 03:43 PM AKST

Hello from Seldovia As a 4th generation commercial fisherman from the waters of Cook Inlet I'm writing in response to the discerning idea of closing the the waters to commercial drift netting inside the EEZ of the lower central district. Closing these waters has no purpose other than to put permit and vessel owners into hardship that frequently fish this area when state management allows. These waters are very productive during the course of the season and it is my belief that as a conservation measure for king salmon this area of which it comprises a large portion of Area 1 to be open more to drifting instead of concentrating more vessels into the corridor sections that are on the east side and most of the King Salmon can be found.

It is my belief that ADFG does an adequate job of managing the area that includes the EEZ as the regulations allow that have been put forth by the Board of Fisheries. Please take into account that the majority of folks that use these waters to fish are private and have taken great personal and financial risk to endeavor as a fishermen in Cook Inlet.

Iosif Martishev
N/A
11/27/2020 03:32 PM AKST

Hello, my name is iosif martishev. Im a resident of the kenai peninsula and am part of a Russian old believer settlement at the head of kachemak bay in which 9/10 house holds participate in fishing. Fishing is in our blood! I'm a commercial drift fishermen in Cook Inlet. I have been a permit holder since I was 14 years old. Cook Inlet salmon has been my livelihood since I was a teenager and plan on it being my livelihood till my body gives out.

The Cook Inlet fishery is a perfect fishery for young fishermen with little capital that plan on getting into the fishing industry. With low permit costs and being close to the road system it's an ideal fishery for newcomers. With that being said, I implore you to vote for alternative 2.

The past 5-7 years have been the worst fishing seasons I have endured. State management is run by politicians on both sides of the isle, all while the resource isn't fully utilized and fishermen suffer. Another year or two of this blatant mismanagement my permit won't be worth the paper it's written on.

If alternative 4 passes it will remain status-quo; Running fishermen into the ground all while fish rots on the bank that could've payed a fisherman and fed a family.

With NPFMC's record of having the best management practices in the world why not bring back a fishery to its golden heights? Isn't that the goal of the council to fully utilize a resource for maximum benefit? Partisan politics belong on the TV screen not in our everyday ordinary lives. Thank you for your time and consideration!

Daniel A Smith Jr
Lifelong Cook Inlet Drift Commercial Fisherman
11/27/2020 03:23 PM AKST

My name is Daniel A Smith Jr and my family has commercial fished in Cook Inlet for 8 decades. Last season marked the worst season by state management that I have ever experienced. Our earnings compared to those of the 1960's. We are at the lowest point we can go. For the sake of Cook Inlet salmon resources, do not consider the unvetted alternative 4 but approve alternative 2 with all amendments to comply with Magnuson-Stevens Act national standards as required by law. The over escapement of our major river systems is mute testimony to inadequate fish management due to removal of commercial fishing time. Please do not allow the state of Alaska to destroy our viable fishery. Thank you.

Erin Willahan
Setnet fisherman
11/27/2020 03:16 PM AKST

APPROVE ALTERNATIVE 2 WITH AMENDMENTS to comply with Magnuson-Stevens Act National standards as required by law. REJECT ALTERNATIVE 4 ENTIRELY. Alternative 4 was unethically late submitted, is unvetted, and would collapse the longstanding viable Cook Inlet salmon fishery in direct opposition to the requirements of the Magnuson-Stevens Act, common sense, and the benefit and sustainability of the local communities and economies.

Cook Inlet's commercial fisherman are born and raised Alaskans whose parents and grandparents fish alongside them. They are small-business owners. They are young people who want to stay in Alaska, and who want to know they have a viable future fishing here. They are people who pride themselves in feeding people, who love being out on the water and hard work. They are people committed to taking care of this fishery so that their children and grandchildren can know what it means to be a part of an ecosystem and connected to the food systems that sustain us all. And they are deeply invested in the sustainability of this fishery.

The importance of Cook Inlet for feeding Alaskans and keeping us connected to our food cannot be overstated. For example, 83% of Cook Inlet's setnet permit holders are Alaskan residents, the highest proportion of any fishery in the state. And we feed Alaskans too. Not only ourselves and the people we love, who rely on the income from the fishing season each summer. But also people across the state.

As a young Alaskan fishermen, myself and my peers need to be secure in knowing that our livelihoods are secure and our long-term futures are being kept in mind. Collectively, we hold so much knowledge. From the best scientists and fish biologists, to local knowledge held by fishermen who have been navigating these waters and fishing in the Inlet for generations, to the wealth of Indigenous Knowledge held by communities with millennia of best practices. These are all amazing tools. And a dedicated fleet of commercial fishermen is also an amazing tool for managing a sustainable and diversified fishery in Cook Inlet. Each user group plays an important role in managing this resource, and the contribution of the commercial fishery to science-based management, knowledge systems, the local and state economies, and Alaska's rich fishing culture cannot be overstated. I urge the Board to wholly reject Alternative 4 and to support Alternative 2.

Tino Perone
F/V Redout
11/27/2020 03:11 PM AKST

Dear board members I strongly urge you not to consider alternative 4. That would only put an end to the tradition and livelihood of many families that have fished Cook's Inlet for generations. This last minute proposal put forward by state of Alaska is nothing more then another political ploy to advance the capricious agenda of a well connected individual that has made his life long ambitious to eliminate the commercial fishery in upper Cook's Inlet.

Alternative 2 with a few amendments would put the State of Alaska in compliance with the mandates ordered by the 9th circuit. Please do not fall for this political nonsense. Don't destroy the livelihood of many just for the benefit of a few. Follow the science and the inlet will return to what it once was, a place that befitted all user groups. Thank you Tino Perone Permit holder Kenai, Ak

Andrew Hanrahan
Cook Inlet Drift Fisherman
11/27/2020 03:09 PM AKST

Let's not pretend that the guided sport fishing industry in Cook Inlet isn't commercial fishing. It is, under a different name. Certain factions of the guided sport fishing industry have been completely committed to the elimination of commercial fishing with nets in Cook Inlet for well over 30 years.

The sport guided commercial fishing grounds are slightly different, mainly via the relative safety of the Kenai river, with some owners having high priced riverfront properties complemented by gardeners, cooks, multiple guides, entertainers and housekeeping staff etc... Fishing opportunities and profits are maximized for the commercial non-net fishers by packing the rivers full of fish whether biologically sustainable or not. Which brings us to where we are today, with the State of Alaska through the ADF&G and the Board of Fish increasingly for years behaving as if Cook Inlet were a special consideration not needing to comply with the provisions of the Magnuson-Stevens Act.

What at one point was a good example of biologically sustainable fisheries management has now been transformed, with one commercial group pitted against another to resemble an ad-hoc sideshow that doesn't need science or any further research because "we have it all figured out". In consideration of the above I would strongly urge this body to adopt Alternative 2, with various amendments as necessary, to bring about a Fisheries Management Plan fully compliant with the Magnuson-Stevens act and Ninth Circuit Court ruling. The resulting plan should be biologically sustainable, and fluid enough to respond to changing run timing, rather than adhering to the current overly simplistic and disastrous model of "on this date is when the fish are supposed to be here, death by one thousand cuts" policy toward the fishermen with nets.

Henry Russell
11/27/2020 02:43 PM AKST

November 2020 To the Chair and members of the NPFMC: In your December meeting you will be selecting from a range of 4 alternatives and taking final action on the Cook Inlet Salmon FMP. We are extremely concerned about the recent addition of Alternative 4 to the range of options. We are very much opposed to Alt. 4 as it would have a significant negative financial effects on our businesses and our community. Our businesses and our town benefit greatly from the commercial fishery and have for decades. Closing fishing in over half the area that the commercial fleet needs to harvest salmon would effectively eliminate the entire fishery.

We the following businesses, support Alternative 2:

Alaska Boats and Permits	Benchmark Nets
Chugach Wild Salmon	D & D Welding
Eagle Safety	Edgewater Marine Surveyors
Fortune Sea Mariner Services	Full Power Starter and Alternator

Grog Shop
Homer Marine
TechnoMetal Post

Homer Boat Works
Homer Steel Fabricators

Sergi
Cookinlet drifter
11/27/2020 02:40 PM AKST

I was a drifter in cookinlet over 30 years I have seen a big changes management was lots better in the past then its these years they took our bread and butter off our tables and gave it to someone else I feel like its not fair and we want it back as they way it was thank you

Amy Russell
11/27/2020 02:29 PM AKST

APPROVE ALTERNATIVE 2 I'll admit it. When I first heard of Alternative 4, I was strangely relieved. Yes, I thought, just put the fishery out of its misery! No longer would I have to watch my husband suffer at the hands of the most political fishery in Alaska. No longer would I have to listen to him be reassured by the biologists that yes, there were enough fish to warrant a full-opener. To have him pore over his years of data, plotting and planning with his group on when and where to go, only to have it all pulled out from under him when the announcement relegated him to the corridor or closed the opener completely.

Sure we would incur costs buying into a new fishery. But at least then he would only be limited by the fish returns and his own abilities and decisions. However, my husband loves this fishery. We won't hand it over without a fight. It was his first deckhand job 25 years ago, and he has fished it ever since. He loves fighting on the line with the other boats. He loves when the seas are rough because he has the skills to still light up his net. He loves the camaraderie with the friends he has made. After a real opener, he comes home exhausted but unable to sleep as he retells me about the sets of the day.

I fight because now there is hope! With the feds coming on board, we now have a chance to have a science-based fishery. Hope that the commercial fishermen, backbones of community and economy, can catch the fish they have paid for the right to catch. Hope that this decades old Alaska fishery will ,once again, be valued.

Dyer VanDevere
Life long Cook Inlet Commercial Fisherman
11/27/2020 01:48 PM AKST

I've been a commercial fisherman in Cook Inlet for 55 years. Commercial fishing has been an integral part of the Cook Inlet economy for decades & decades. The consideration that Alternative 4 is the way to further mismanage Cook Inlet salmon stocks is bizarre. to even have this option to be considered, is not the way for the state to comply with the MSA.

For the state to put this in for consideration at the last minute without proper public vetting, just shows the state's contempt for the 9th circuits ruling and MSY management in Cook Inlet. This fishery is trying be politically managed out of existence. If it wasn't, there wouldn't be a 9th circuit ruling. Alternative 4 would be one of the last nails in the coffin for this fishery and should be totally rejected.

This fishery needs to be managed to MSY and the 10 National Standards as the MSA and the Alaska State constitution states. This is an important food source for the nation and should be treated as such. Alternative 2 with amendments that comply with MSA and the 10 National Standards is preferred.

Taylor H Evenson

Nedra E

11/27/2020 01:47 PM AKST

Commenting on Alternative 4, being considered for federal management to take over cook inlet and close it to commercial fishing. Restricting fishing in federal waters is restricting catch, and is truly a technique of re-allocation of the resource to in river users.

With the depth of waters in Cook Inlet, and the historic flow of salmon, harvesting fish effectively within 3 miles of shore is very difficult. This is not Bristol Bay and cannot be managed in the same way. To effectively harvest salmon the drift fleet needs access to federal waters, they need the opportunity to catch where fish rise to within net depth, this can be very random and is thus why fisherman need access to larger areas to be effective. The natural flow of sockeye into the Kenai river, the main sockeye producing system in Cook inlet, runs through federal waters and is virtually not harvestable in state waters by the drift fleet. Those within the state who propose the shut down of federal waters are aware of this, and their goal is to reallocate this resource through any means possible to in river users.

Be aware that an acceptance of alternative 4 is an acceptance of reallocation of the salmon resources of Cook Inlet away from the commercial users and towards in river users. This is the goal, and you will be complicit in it if you vote in favor of this option. I would ask that you consider the people who are being displaced, not the trade groups, or political actors who claim to represent us. I am a third generation Alaskan Cook Inlet commercial drift fisherman, I have left Cook Inlet because the future there has been unjustly destroyed. We have watched, under state management, the intentional destruction of our fishery, my culture has been destroyed so much so that I had to leave it.

Many hoped that federal management would restore some sort of justice, restore some sort of hope, restore some sort of culture for us and our children. Alternative 4 would be the opposite, it would be the nail in the coffin, and those who don't care for their neighbors and their neighbors historic tie to these lands would revel in that nail. Many trampled on minorities have looked for the protection of the federal government when states have been tyrannical, count us as one more. I ask that you please protect our rights, and our way of life- I ask that you reject Alternative 4

Mark Reutov

F/V Voyager

11/27/2020 01:46 PM AKST

I've fished in UCI with my father and brother when I was younger, and in 2020, fished in the commercial drift fishery on my own vessel. It was hard enough to keep up with payments, as the 2020 season was arguably the worst one in history. A closure of the fishery (as proposed in proposition 4) would complicate or even destroy any chance i have in continuing to be a commercial fisherman. The same goes for all the younger folks who have bought vessels and permits for tens and even hundreds of thousands of dollars. Cannery workers would lose their jobs, and their families would suffer. Im new to all the politics but I strongly oppose proposition 4. Let's manage the fishery the right way, so that fisherpeople of cook inlet can have a future. Thank you, Mark Reutov

Deborah Anderson

11/27/2020 01:42 PM AKST

I was a Inlet Drift Permit Holder and I strongly oppose Alternative 4 because there is no science behind it, this is purely political. The State of Alaska does not want to manage the EEZ area under MSA their solution is to close the area, which clearly is not the solution. The impact to the small communities will be insurmountable, and the fish that would be left to go up streams would further devastate the river systems. That is certainly not properly applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Please do not allow the state of Alaska to bulldoze this policy through! Deborah Anderson

Nikita Kuzmin
Commercial fishing
11/27/2020 01:42 PM AKST

Hi My family was fishing cookinlet since the 70s I remember going fishing since I was 8 In 1989 purchased cookinlet permit started fishing on my own Seen so much change the state kept taking away every meeting to point now we not allowed to fish regular opening

Cut 80% of the fishery it's not worth getting your boat ready n expense we have State of Alaska board of fish took regular openings from commercial sector 80% of the fish stock to satisfy the sports sector The last dozen years they over escaped the kenai river by half million fish or more increase escapement All its doing is destroying the ecosystem we getting less return

We would like to get our fishery back n let the professionals biologists do their job without restricting them I own permits in cookinlet someday will come back when the state will allow us fishing again 2 years ago I was forced to move to another area was hard move with so many years in minus income I just cant support my family n business in cookinlet With almost million fish available for harvest n state is restricting to harvest n over escaping rivers I support commercial fishing to maximum sustainable what Stevens magnuson law Thanks Nikita Kuzmin Delta junction

Brent Western, Tony Western & Kirt Western
11/27/2020 01:24 PM AKST

Our family has fished UCI and the GOA for over 50 years spanning 3 generations and the viability of our operation is dependent on sound, science-based management and fishing the EEZ. We have invested heavily and our combination vessels are reliant on viable, multiple fisheries. Destroying our historical UCI fishery as proposed in Alternative 4, which we **STRONGLY OPPOSE** would have a domino effect of disastrous socioeconomic proportions to our family business, industry, the Kenai Peninsula and Alaska.

If we lose our historical UCI fishery we lose our fishing operation (salmon, halibut,...) and Alaska loses. This last-minute proposed alternative 4 is a sham. We **STRONGLY SUPPORT** Alternative 2 with the caveat that all escapement goals, management plans and in-season management practices must adhere to the MSA and the 10 National Standards. For the socioeconomic betterment of diverse, stable and viable Alaska communities -- our families respectfully implore you to reject Alternative 4 and accept Alternative 2 with good science as outlined by the MSA and the 10 Standards. Respectfully, Brent Western, Tony Western & Kirt Western

Lara K Fleenor
Edgewater Marine Surveyors of Alaska LLC; 4th generation fishing family (F/V Clara Lee)
11/27/2020 12:47 PM AKST

Dear Chairman and all North Pacific Fishery Management Council representatives, In your upcoming December meeting you will be selecting from a range of 4 alternatives and taking final action on the Cook Inlet Salmon FMP. We are extremely concerned about the recent addition of Alternative 4 to the range of options that was introduced last minute by the State of Alaska representatives on the Council. We are very much opposed to Alternative 4 as it would have a significant negative financial effects on our local fisherman, businesses and our community.

Our local fisherman, businesses and towns benefit greatly from the upper Cook Inlet commercial salmon fishery and have so for over six decades. We do not support Alternative 4 which advocates for the closure of commercial salmon fishing in over half the designated area in Upper Cook Inlet that the commercial fleet needs to harvest salmon. Supporting Alternative 4 would effectively eliminate the entire upper Cook Inlet commercial salmon fishery. The upper Cook Inlet drift fleet is already burdened to the point of bankruptcy by politically motivated area closures of this type during the fishing season.

We support joint management of the Cook Inlet salmon fishery between the State of Alaska and NPFMC / NMFS using the directions of a legal Fishery Management Plan that is compliant to the Magnuson - Stevens Act including the Ten National Standards. We support applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Sincerely, Lara Fleenor

Trofim Martushev
Commercial fisherman
11/27/2020 12:08 PM AKST

To whoever this comment may concern to. My name is Trofim Martushev. 3rd generation commercial fisherman in cook inlet. Ive spent most of my 28 years drifting out of kasilof with my old man and about 13 years ago ive invested in my own boat and permit. Ive spent lots of summers with heartaches and stresses due to closures and late payments. Cook inlet is a major part of my life and my familys. If i cant make ends meet due to not making money to pay my housing rent and buy food for the family. Im self dependant and dont want to rely of the givernment for housing and food. Seems like its headed in that direction. So here i am begging for cook inlet not to be shut down. Its bread and crumbs for most of the 400 boat and permit owners. So please let us fish. Sincerly.. Trofim Martushev Aka.. f/v Bonnie-D

Daniel Anderson
Paragon Fish Corporation
11/27/2020 12:00 PM AKST

To all council North Pacific Fisheries Management Council members and support staff: I was one person in the first group of stakeholders selected for the Cook Inlet stakeholder committee. I was excited at first with the thought of hopefully having productive conversations, to some sort of reasonable product in the end.

While at my seat on this committee, my seating arrangement had myself, most often sitting next to the state's representative at the table. Not once, during any of our meetings, over the close to 2 years did I hear from the representative that option 4 was an option. At the October meeting it was offered as another choice, without being vetted by the stakeholder committee. In my opinion, this is an unethical way of doing business.

In the late 1980's, I came from Wisconsin, to help the NPFMC, with the first baby steps of the now IFQ system in Alaska. I sat on a board in Wisconsin, which had put in practice, one of the first IFQ systems in the world, multi specie, with a magnitude of different qualifiers. Much more complex than Alaska's. I spent many hours reviewing document's and conversation on the phone, after returning to shore every evening. Trying to do the right thing. Now, that very same council (different personalities in the seats) is tasked with deciding part of my future.

I reside in Homer, which is my homeport while fishing in the Inlet. I return to Homer for my offload for much of the season. Having a fast boat makes this more so possible than if I had an average speed vessel. I get to witness while offloading, the crews on the docks. Most of the crews consist of high school aged young people, two of my three children have been amongst them over the years. Their high school buddies next to them, most often, all having fun and learning the value of a dollar. Now most of them are off in college learning to be teachers, engineers, military, and maybe a fishery biologist in the mix with hopes of becoming a fisheries manager. If option 4, is truly being considered, even with my fast boat I will not be able to return to Homer, in a timely fashion, for my offload. Hence, the social interaction on the Homer dock with be non-existent.

Homer is a coastal community. One of the many important considerations of MSA. I want you all to know it is very hard for me to temper my frustration with the way management of Cook Inlet has been over the last 30 years. I believe, it was somewhat obvious, during the stakeholder meetings. The

Salmon stocks in Cook Inlet, are showing the way they can, with the size of the fish, run strength, timing, return at age, to name a few that the Cook Inlet experiment has failed miserably.

As I age, I have come to learn that the sometimes-said statement by other kid's parents, while I was a young teenager. I cannot wait till the kids are out of the house then we are done with them. This statement is not really an accurate statement if you are a good parent. Parenting never ends!!!! As with Salmon we must take care of them from birth till the end of their life span. Not two different sets of rules, mixed messages, is a recipe for problems. All Salmon must be managed from the gravel till they return to the gravel, under the same set of rules, MSA states them very clearly. If the state wants to do their own thing let them do it on the land locked lakes in Alaska. Option 2, with the mandates set forth in MSA included is the best for our children, the Salmon. Respectfully, Dan Anderson
Paragondan58@gmail.com (414)788-5197

Michael Gatling
Cook Inlet Commercial Fisherman - Setnet
11/27/2020 11:01 AM AKST

To: Members of North Pacific Fisheries Management Council, I have been involved in the Cook Inlet Commercial Salmon Fishery for 35 years. And now, in these difficult times, I find it appalling the Dunleavy Administration and the State of Alaska would propose an alternative as detrimental to so many fishing families, businesses and Alaskan communities as Alternative 4.

As other user groups have developed and grown, commercial fishing in Cook Inlet has become more restricted with progressive reductions in time, opportunity, and area. Alternative 4 will drive more people out of commercial fishing. The domino effect will in turn challenge the ability for continued operation of processors, equipment and marine suppliers, fuel, groceries et al.

There has been a long historical record of sustainable Cook Inlet commercial salmon fishing. It is one of the cleanest commercial fisheries of wild stocks anywhere in the world. The time has come to end the continuous effort to shut down Cook Inlet commercial salmon fishing. It is time to stop pointing at and blaming commercial fishing families for problems with salmon stocks. It is time to recognize Cook Inlet commercial fishing for the important and viable industry it is, desired for its value and necessity to the future health and prosperity of the region. It is time to acknowledge and recognize the exploding growth, and detrimental impact of in river user groups on all of the salmon stocks. It is time for all Cook Inlet salmon user groups to acknowledge their own culpability in problematic salmon fisheries, and then work together to resolve issues. It is time to end political management of Cook Inlet salmon stocks and return to biological management.

Please reject Alternative 4 entirely. This was unethically late submitted, is unvetted, and would collapse the longstanding viable Cook Inlet salmon fishery in direct opposition to the requirements of the Magnuson-Stevens Act, common sense, and the benefit and sustainability of the local communities and economies. Please approve Alternative 2 with amendments to comply with Magnuson-Stevens Act national standards as required by law. Respectfully, Michael Gatling

Tim Keohane
Cook Inlet Drift Fisherman
11/27/2020 10:30 AM AKST

I am deeply troubled that we are at the stage of final comments and decisions with a 450 page plan that contains errors regarding permits dual and/or stacking. In addition there is a note by the CFEC saying their data is unreliable due to "permits often change several times per season". Permit transfers are seriously regulated by the CFEC. A statement like this is alarming to me as it should be to the commission. I would expect a close review of the facts to avoid having to repeat the process due to faulty statistics.

That being said: I am a drift fisherman, having fished Cook Inlet for over 50 years. My family has, and to a great extent, still are involved as drifters in Cook Inlet. I oppose option 4. The area

described (EEZ waters) has for my entire time fishing, been extremely important for the economic viability of the entire fleet. In addition the fish harvested there are of higher quality with the quality diminishing slowly as the harvest approaches the spawning grounds. Once the fish enter the intertidal zones of their destination stream, the rate of degradation increases. This quality issue is reflected up through the processing sector and then to the consumer. these waters are important to a healthy economic viability.

I support option 2 as the others fall even shorter when considering the long term health of all the salmon stocks in Cook Inlet. It is possible to write the "perfect plan" and still have the stocks collapse due to an uncoordinated approach when the stock enter state managed waters. Again I request the council to reexamine the statistics used to formulate the options presented. If that is not possible then I urge you to adopt option 2. Thank You Tim Keohane

Michael Limacher

11/27/2020 10:15 AM AKST

My name is Michael Limacher and I have lived and fished in Cook Inlet since 1997.Over the years,I have watched the fishery get cut back more and more each year to now where we only get to fish a few openers a year.The Cook Inlet fishery is now being managed politically rather than biologically and we have watched over escapement needlessly.Therefor, I am in strong opposition to Alternative 4.This would collapse the entire fishery which seems that the Dunleavy administration along with the ADF&G are trying to obtain.I approve Alternative 2 with amendments to comply with MSA national standards as required by law! Thank you

Deborah

11/27/2020 10:05 AM AKST

My name is Deborah Nakada Limacher.I have commercial fished Cook Inlet as a driftnetter since 1978 and then a setnetter since 1987. I know the value of these fisheries both as a way of life and the monies brought in by the fishermen and fisheries.

I am totally opposed to Alternative 4 which was a rush job and is in total opposition to the requirements of the Magnuson-Stevens Act which is the gold standard for fisheries management.I am in favor of Alternative 2 with amendments to comply with MSA standards as required by law.

I have fished long enough in these fisheries to see the erosion of biologically sound management only to see Cook Inlet become a politically motivated fishery,basically excluding the commercial fleet and it has to stop! We setnetters provide so much fish for the world to eat and instead,we have had to stand by and watch overescapement of sockeye year after year because it is wrongly managed.We want our livelihoods back with a strong salmon run every year! Under Alternative 2, escapement goals for all stocks of salmon and management plans will meet the standards of the MSA and the Ten National Standards.Thank you

Crookston Family

Grateful Set Gill Net Fishing Family

11/27/2020 08:48 AM AKST

I am truly grateful for the outpouring of sincere honest responses submitted in earnest to this council. These many responses and particularly the painstakingly prepared letters from political leaders, associations and qualified participants in the industry represent not only perhaps thousands of hours of thought and effort, but even more importantly they represent what would certainly amount to centuries of combined direct first hand experience and knowledge of this issue.I am grateful the NPFMC now has the tremendous benefit of this perspective and input.

Speaking for a 4 generation fishing family with nearly 60 years experience in Cook Inlet, I urge you to embrace this input, uphold the reputation of the integrity of this Council, recognize and reject

disingenuous manipulations for what they truly are, act according to the fiduciary responsibilities placed with this Council; and finally, for Heaven's sake — DO THE RIGHT THING!

Daniel Anderson JR.

11/26/2020 09:02 PM AKST

Hello, good evening. Today is Thanksgiving as I am finally sending this out, the day in which being thankful for items, relationships, experiences, and people are emphasized. Not to necessarily say every other day of the year is any different, today it is special. In my life I have a lot to be thankful for. A warm house, a dog, a full time job, and a community that takes care of their own, BUT what I have learned over my life is I am even more thankful for the things in life that are finite. The sunrises, the sunsets, the long walks on The Spit, and the cribbage games with my old man telling me tales of fishing on The Great Lakes.

My family is from Wisconsin, where 30 years ago men on modified tug boats fished their hearts out every day trying to put food on the table for their family. Currently that doesn't exist anymore. It was mismanaged and invasive species made it almost impossible. Obviously that destroyed families, but what isn't as obvious is how it destroyed so many small fishing towns. I am afraid to see that happen here. I am terrified of Homer, AK suffering the same problems. We suffer as is with seeing how most of the revenue recycled into the town is through the tourist season. I'd hate to have to tell my kids one day that Homer USED to be a great place much like Algoma, WI. My name is Daniel John Anderson JR, and I not only think the lack of competence in Alternative 4 is laughable but it is truthfully heartbreaking. What're you thankful for?

Gale Flynn

11/26/2020 05:46 PM AKST

I am a third generation Cook Inlet fisherman. I strongly oppose alternative number 4 which would close the Cook Inlet commercial fishing industry. This would be a blow to not only my family and the community who depends on this fishery, but also the Kenai River itself would suffer. It would not be able to sustain the over escapement which would result from the fishery being closed. I hope you will not even consider Alternative #4 and instead consider Alternative #2 with some amendments.

Matt Pancratz

Cook Inlet Drift Permit and boat owner- Professional net hanger-UCIDA member-Nikolaevsk resident

11/26/2020 12:04 PM AKST

Chairman Kinneen: I'm a 67 year old resident of the Cook Inlet coastal village of Nikolaevsk. I've Commercial Drift net fished for salmon in Cook Inlet for nearly 40 years. For 40 years I've owned a Permit, run my own boat, hung my own gear and hired a crew. I started professionally hanging gillnet to off set steadily falling salmon fishing income. Now the fishery is so depressed the returns do not cover the expenses. I can not get a crew because they can't make any money and the revenue from hanging nets has declined every year so that now I can't afford to hire my neighbors that often help me. Other fishermen in my community and other small Kenai Peninsula communities are suffering from similar problems.

It's not a surprise to any of us given how the fishery has been mismanaged for decades. The Drift fishery will completely collapse unless a new plan, compliant with the Magnuson Stevens Act can be implemented. I support FMP alternative 2 (expanded scope) and whole heartedly reject alternative 4. Alternative 4 offers no remedy for the social and economic upheaval and harm experienced by small coastal fishing communities in the Cook Inlet area like Nikolaevsk. These are the very types of villages that Congress enacted MSA to protect and support. The area restrictions of alternative 4 combined with the other area restrictions to the north would be the final blow to the Drift fishery and would cause

additional and irrepreable harm to the small coastal fishing communities like Nikolaevsk that MSA was enacted to protect and support.

The state's last minute introduction of alternative 4 after the close of public comment communicates a number of important things regarding FMP alternatives. First, it communicates the state's willingness and need to repress public comment thereby disenfranchising stakeholders regarding their right to participation in the process. Second, it communicates an enduring and systemic state government intransigence regarding the fact that Cook Inlet salmon are a national resource, not property of the state and Cook Inlet Salmon Drift fishermen are an essential element of the national food production industry. This is a fact highlighted by MSA but ignored by Alaska State leaders, the Board of Fish (BOF) and the Alaska Department of Fish and Game (ADF&G).

Finally it communicates the state's indifference toward the declining social and economic health of the numerous small Kenai Peninsula communities like Nikolaevsk that depend on commercial salmon fishery. The fishery is important to and necessary for a viable, robust Kenai Peninsula economy. All this should be a warning and emphasize the need for a FMP that has rigorous oversight and uncompromising and fierce accountability to the standards of MSA. Again, I reject alternative 4 and reinforce the Cook Inlet Salmon Committee's consistent support for Council action to fulfill alternative 2 (expanded scope)
Matt Pancratz

Paula Keohane
self

11/26/2020 11:33 AM AKST

I am a Cook Inlet Commercial Drift Gillnet Fisherman who will be significantly impacted by the decision by NPFMC regarding management of the EEZ in Cook Inlet. I bought my permit in 1976, fishing my boat "Ruffian" myself under myriad ADG&G management plans until 1996 when I transferred the permit to my husband who has fished it ever since. He now fishes with our son, who bought his own permit, under the "Dual Permit" regulations.

I continue to be actively involved and followed the process and deliberations of the Salmon Committee and the Staff reports and recommendations. I've read the Draft document and analysis for the Final FMP for Cook Inlet. There is at least one glaring and significant error in the information which has been published in the draft. In section 4.5.3.1.5 Permit Stacking (it states) "Since 2017, the BOF has allowed for stacked permit operations in the UCI salmon drift gill net fishery. A stacked permit operation is where an individual who holds two SO3H permits can fish up to two FULL (emphasis mine) complements of gear (5 AAC 21.333(a))" No Kidding?? 6 shackles constitutes two full complements of gear. I think I would have noticed someone with 6 shackles out. Also that is NOT what 5AAC 21.133(a) says! There is also a note by CFEC saying their data is not reliable in accounting for dual and stacked permits because "permits often change several times per season" Really? I don't think regulations allow for several in-season transfers. These are just a couple of the miscalculations and misinterpretations of data in the document.

This is a totally inadequate analysis, fraught with inaccuracies. I expect more from the many scientists and fishery managers that participated in the research and production of this 450 page draft document. It is obvious that the council became frustrated, even irritated with the stakeholder Salmon Committee. I get it. However someone, in all of your reviewing, SHOULD have caught this.

I understand that ADF&G will remain the primary managers of the UCI drift gill net fishery as it is conducted primarily in state waters and the council does not have legal authority to direct ADF&G on how to manage the fishery; However the 9th circuit decision requires the council to review and approve the annual plan and determine if it complies with the mandates of MSA. Those mandates include how decisions and plan will impact fishermen and the communities that depend on them. Since ADF&G (thru BOF) claims that they improved the economics of Drift Gill Net fishermen by allowing "Stacked permits with 2 full complements of gear", as the draft analysis implies, it is clear that ADG&G is promoting incorrect information. The BOF considered allowing 2 full complements of gear, but they

only approved 200 fathoms, same as dual permits. In your own analysis, 200 fathoms of gear was not a significant economic improvement. however stacked permits (with 6 shackles) represented a disproportionate percentage of the total catch.

It is essential that the mandated review is legitimate and conducted using reliable information and data. This document and analysis is inaccurate in a very critical detail negating the ability of the council to make an informed decision. In using the analysis in this document to determine economic impact to the fishermen and dependent communities the council can cause great harm in acting on the supposed validity of the data and conclusions therefrom.

Janet Yaeger

Resident of Cook Inlet fishing community; biologist

11/26/2020 11:22 AM AKST

I am writing as both a biologist and a two-decade resident of the Kenai Peninsula to express my strong opposition to the proposed Cook Inlet Fisheries Management Plan Alternative Four. In 2020, Cook Inlet drift gillnet fishermen had limited openings both in terms of geography and fishing time. The summer of 2020 was hands-down the worst harvest year in decades for these fishermen, in part because of very limited openings in Area One. Fishermen are struggling economically as a result. Many realized only a small fraction of their expected income, and permit values have plunged. At the same time, the Kenai River escapement goal was exceeded by 800,000 fish. Had the drift fleet been allowed to catch more of these fish, there would have been significant and immediate local economic benefit, as well as longer-term ecological benefit for the fishery. As it is, this over-escapement will damage future fish returns.

If Alternative Four passes, the summer of 2020 is likely to be a harbinger of things to come. Area One fishing openers are critical for the Cook Inlet fishing economy. The fish caught in this area are higher-quality and tend to bring higher prices because they are caught earlier in the season. If excluded from fishing in this area, the Cook Inlet drift gill net fishery will become economically untenable for anyone other than ‘hobby fishermen’. The canneries that create hundreds of local jobs will close. A way of life that has existed here for generations and shaped the local culture and economy will cease. And maintaining a sustainable salmon return will be made much more difficult with a critical tool removed from the management portfolio.

The commercial drift gillnet fishery is the most effective method fishery biologist have to manage for sustainable salmon escapement levels. Alternative Four would not only destroy a long-standing local fishery; it would have negative ramifications for personal use and sport fisheries as well. Local ecological systems that are dependent on marine-derived nutrients (a fancy way of saying ‘rotting salmon carcasses’) would also suffer. Alternative Three is also unwieldy and would create a management nightmare. It is simply unrealistic in what it would require from both fishermen and managers, at both the State and Federal level, to implement and comply with.

Therefore, I am in support of Alternative Two. It complies with the court decision without tossing out many decades of management experience on the part of the State of Alaska, and is the most viable in terms of maintaining both healthy fisheries and a healthy and diverse fishing economy in Cook Inlet. In two years of meetings, Alternative Four was never even considered by the working group. It was added at the last minute and without sufficient opportunity for public notice and comment. It should be voted down decisively and without question or further consideration.

Bob Correia

F/V East Rip

11/26/2020 09:41 AM AKST

Council members 1965 wasn't a great salmon season in Cook Inlet, but at 16 years old it was my first. The next year, 1966 was off the charts.... with more fish than some processors could handle... the Gov. allowed Japanese factory ships into the Inlet to help with the glut. Too late to really help out much

... it was indeed historic. And that ... I learned ... is how it works ... with the endless cycle of good years and bad years ... we adapt and are always excited for next season.

I'm 72 now, and am truly grateful to have been a Cook Inlet commercial fisherman for more than 50 years. The question I have is this: What will it take for my kids and grandkids to have the same opportunity to spend a lifetime in this fishery like I have. The answer ... surprisingly ... it wouldn't take much. Unlike some salmon systems in the Pacific Northwest ... we are not challenged with restoring dysfunctional rearing habitats in order to get our salmon runs to restore. Cook Inlet has many strong salmon systems that often produce returns above and beyond BEG's. All we have to do is commit to sustainable biological management principles and plans ... and the rest will take care of itself. The MSA provides those needed guidelines and we simply need to have a FMP that recognizes that.

The failure to follow the tenets of MSA is why we're all here right now. I would hope the council would choose a MSA compliant option 2. About option 4: No sense beating around the bush here. Those involved in a long protracted effort to end commercial salmon fishing in Cook Inlet have not only bought themselves a Governor ... but also managed to find powerful positions within the administration. With a growing history of creative attempts to bring an end to CI commercial fishing ... option 4 is nothing more than a disingenuous Hail Mary attempt to get the council to help them do what they have so far failed to achieve on their own.

Please don't accept option 4 as an honest solution or simply an easy way out of this FMP challenge. Please don't consider option 4 as simply a survivable reduction in fishing area available to the drift fleet. The closing of the EEZ will not be survivable for Cook Inlet commercial fisheries. One of the underlying strategies in option 4 is to impose additional stress and uncertainty to the remaining fish processors that are struggling as it is to project a profitable future in Cook Inlet. Thank you for the opportunity to offer these comments. Bob Correia Kasilof, Alaska

Roberta Nyce
Commercial Fisher
11/25/2020 07:02 PM AKST

Having fished commercially in Cook Inlet for 40 years it is devastating to see Alternative 4. Commercial fishing on the Kenai Peninsula has existed for over 100 years. It's part of the culture of our community. We and our crew help support the local economy buying outboards, boats, groceries, supporting schools, healthcare, all aspects of our economy. It's difficult to understand why you are considering this option. Commercial fishing is a tremendous investment both financially and personally. I support Alternative 2.

Christopher H. Worley
11/25/2020 06:19 PM AKST

The Cook Inlet driftnet salmon fishery is dying unnecessarily. Production of food is essential. Please do not hasten the demise of this fishery with additional restrictions that favor recreational interests. Rather, help us preserve this vibrant and sustainable fishery.

Ian Maury
Halibut Cove Community
11/25/2020 04:52 PM AKST

Council Members, I'm commenting in support of Alternative 2. This is the only tenable alternative for Kenai Peninsula Coastal Communities. In Halibut Cove there are a number of households that are supported by the Cook Inlet drift Gillnet fishery. As well there are countless residents who benefit from the offshore fishery. This fishery is the supplier of fresh reliable salmon to our fish camps. Salmon fishermen from Homer, Seldovia, Halibut Cove, Ninilchik, Kenai, Kasilof, Anchorage and others will be put out of work by Alternative 4. Not to mention Fish plants in these communities suppliers, net lofts, Bars, restaurants. When there is a robust sockeye season in Cook Inlet you can feel it

permeate all aspects of our coastal economy. Don't shut this down. I am a Cook Inlet permit Holder and I haven't fished for 3 seasons. Mismanagement has left this fishery on the brink of extinction. I operated in the red for a few seasons prior to selling my boat. Don't let your council be guilty of Hammering the final nail in the coffin Cook Inlet drifters.

Brian Miller
Commercial Fisherman / UCIDA member
11/25/2020 04:34 PM AKST

As a life long Cook Inlet drift fisherman I have seen the decline in management practices in recent years to manage the fishery per the Magnuson Stevenson Act resulting in over escapement in the Kenai and Kasilof River systems. This is counter to the MSA mandate to manage the fishery for maximum sustainable yield. The State of Alaska is not managing this fishery as Federally mandated. I strongly appose Alternative 4 and endorse Alternative 2. My family has depended on fishing since the early 70's....this past season was by far the worst season we have ever seen - yet the rivers are blatantly over escaped...again. So as to not lose anymore money and reduce wear and tear on my vessel and gear I was forced to stop fishing early and tie the boat up. This cannot continue - the river systems cannot continue to be over escaped year after year and be expected to produce the numbers of salmon we saw before the current Fishery Plan was adopted. My stance is to maintain healthy sustainable escapement levels so that we can continue to have a viable fishery and have an abundance of salmon for Sport and Commercial Guides in river. There should be enough fish for everyone if managed properly. Putting the Drift Gillnetters out of business will only exasperate the issue of over escapement. Currently the bulk of what few fish I am allowed to catch are harvested in the EEZ. The Corridor fishery is not sustainable for the fleet - the only way to catch enough fish to make it economically feasible is to fish over the line. I implore the BOF fish to NOT adopt Alternative 4, instead adopt Alternative 2. Thank you

J.Cosmo Mercurio
F/V Meda
11/25/2020 03:11 PM AKST

Sirs, I am urging you folks to do the right thing during your upcoming decision making. The designers of the Magnuson/Stevens Act took the time to study and developed parameters for management. They developed the wisdom to determine the importance of our commercial fisheries. They laid down mandates for management oversight taking into account the health of the resource as well as the economic health of the affected coastal economies. I have harvested salmon in Upper Cook Inlet since 1972. This has been a viable and healthy fishery until recent years. We have been suffering huge losses due to inept state management in the form of ridiculous "step down plans" (flow charts) which have no basis in biological realtime decision making like former area biologists had authority to use. Our fishery is being systematically destroyed under current state management behavior. Alternative 4, which closes much of the commercial salmon fishing area in Cook Inlet, flies in the face of the intent of Magnuson/Stevens. To what end is this? If the intention is to put final nails in the coffin of the once sustainable and lucrative C.I salmon industry then this is the route to take. Removing any part of the existing S03h area would be disastrous. One of the directives of the Magnuson-Stevens Act includes providing sustainable seafood for national food security and sustaining coastal communities. A sizeable amount of Cook Inlet's gillnet fishery takes place in federal waters. I want a viable, healthy fishery again. I want the council to reject Alternative 4 totally. A joint management would be fine only if it adheres to the directives of the Magnuson/Stevens Act including the ten national standards. I would like you to management our fishery in the same manner Sincerely, John Cosmo Mercurio F/V Meda 26994 Johansen Dr. Kasilof, AK

Judy Graham

Individual

11/25/2020 03:10 PM AKST

RE: Item C@ Cook Inlet Salmon FMP Changes in Cook Inlet Commercial Fishing management plans over the past 20 years has led to the devastation of Commercial Fishing in Cook Inlet. As the wife of a life-long commercial fisherman I can testify to the economic hardships these changes to the FMP have had on our lives. My husband's participation in commercial fishing over the past 45 years has provided us with a home and the security of an annual income. I have been proud of my husband's contribution to providing beautiful, healthy salmon to our nation and the world.. But during the last 10 years restrictions to fishing time and location have greatly reduced his income. The money we have invested in his permit, boat and gear is now valued at pennies on the dollar. We are not the only family experiencing this loss. It is difficult for me to understand why families who have prospered through participation in commercial fishing in Cook Inlet find their livelihoods being erased. The Council will be considering Alternative 4 at its upcoming meeting. The impact of Alternative 4 will add to the devastation of our beloved commercial fisheries in Cook Inlet. Our fishing families will be added to those economically marginalized families across America whose industries have gone to the wayside. I ask you not to vote for alternative 4. Please choose an alternative that will maintain commercial fishing in Cook Inlet. Sincerely, Judy Graham Kasilof, Alaska

Lynn Deakins, Board Member

Azarel Setnet Fisheries, INC

11/25/2020 01:46 PM AKST

Alternative 4 is just one more attempt presented by Alaska State officials to quash a Cook Inlet Salmon fishery for local political purposes rather than fish management purposes. Please reject Alternative 4! As one who has held ownership the setnet fishery of CI for over 40 years, we have endured annual tactics to close our fishery rather than achieve lawful resource balance and management for all users. We support Alternative 2, which is a sustainable option for salmon and business, is in compliance with national standards and was lawfully submitted. On behalf of the 4 generations of our "fishing family" we ask you to SUPPORT ALTERNATIVE 2 and REJECT ALTERNATIVE 4!

Jeff Dent

11/25/2020 01:08 PM AKST

I have been a resident of the Kenai Peninsula for 52 years and have been a part of commercial salmon fishing for 37 of those starting out in the mid 80's as a deck hand on a cook inlet drift net boat , then set netting in most recent times . I have seen years of low salmon returns , years of modest returns , years of very good returns and of those years with high returns one can go back to the parent year and find a definite and common pattern of not over escaping river systems , sound management decisions from competent science based biologists with common sense and board of fish members with no political ties . As I see it alternative # 4 should be completely rejected and alternative # 2 approved with amendments to comply with the Magnuson - Stevens act as required by law. It is my opinion that alternative #4 would turn this problem that we now have of over escapement and poor fish returns into a catastrophe of which we might not ever recover from . Commercial fishing was originally set in place as a tool to be used to regulate fish returns both large and small with a goal to obtain a predetermined number of fish that might spawn to ensure future runs for the next generations of fishers both sport and commercial . Alternative #4 makes no sense to me , why would anyone want even more fish in the Kasilof or Kenai rivers when the science shows that the systems cannot sustain the numbers we have now or why would anyone want to take a chance on completely ruining one of the last great God given wild Salmon runs left on this planet ? Does anyone really think that they could stop a river from being severely over escaped at the mouth of or in river with a fish return of approximately 500,000 to 5 million

or more without utilizing a tool such as commercial fishing ? Again where is the common sense ? Please choose Alternative # 2 as the only choice of the choices provided Thank you . Jeff Dent

Rebecca Flynn

11/25/2020 12:59 PM AKST

I was born in Alaska and I am 67 years old. I have read with concern the proposals set forth for you to consider in December. Most notably, I am concerned with your Alternative 4 which would effectively close the Cook Inlet fishery. Surely you would not consider a proposal that would flood the Kenai River with over escapement and ruin this important and vital salmon run. I would like to see you throw out alternative #4 and consider Alternative #2. The Cook Inlet fishery needs to be managed by the State of Alaska with Federal management guidance and not closed. It can be a healthy fishery if politics were left out of the fishery and it was managed through sound scientific management.

Ken Castner

Individual

11/25/2020 12:45 PM AKST

I am opposed to option 4. There has been no consideration given to the economic change that will come from removing such a vast area of fishing grounds from the commercial salmon fishery. The entry pattern of Kenai River sockeye stocks is well known and catch data from the federal waters is also known. This is a high yield area and should remain open. Fishing in that area also supports many businesses located on the southern end of Cook Inlet. SO: Science, historical access, and economics should drive the decision to reject this proposal. Thank you.

Thomas Flynn

11/25/2020 12:45 PM AKST

My dad started fishing in Cook Inlet in 1947. I am a second generation Cook Inlet fisherman, my son is a third generation fisherman, and my granddaughter is a fourth generation fisherman. Cook Inlet used to be a strong, viable fishery that supported this community, and I have watched it steadily decline over the years. The worst thing for the Kenai River is over escapement. To close Cook Inlet for commercial fishing as proposed in Alternative 4 would be a disaster for the river. It could never sustain the amount of fish that would be allowed to escape into the river. It would also be disastrous for the many commercial fishermen who depend on their fishing and for the cities that depend on their taxes that are paid from the fishing industry. I ask you to not even consider Alternative 4 and instead to consider Alternative 2 which would comply with the Magnuson-Stevens Act. The federal management needs to allow the State of Alaska to manage the fishery under the existing management plan.

Susan Hermansen-Jent

Hermansen/Jent

11/25/2020 11:58 AM AKST

My family have been commercial fishing in Cook Inlet since the 1940's. Generations of parents, grandparents, sons, daughters, sisters , brothers, son-in-law, brothers-in-law, nieces, nephews, grandchildren, aunts and uncles cousins , and lifelong friends, all working together in an industry they love. Needless to say, our memories are long and our heritage runs deep. My dad fished and fought for this beloved industry up to age 89, and my mom, 93 in December, is still actively involved. I have seen the Cook Inlet commercial salmon fishery industry from the beginning through the eyes of my patents and grandparents and hopefully it will not end on my watch.... and if the salmon fishery is managed right it won't. We have been through good and bad fishing seasons, and like my father before me, I believe there is fish enough for all users... if managed right. Please Reject Proposal 4, which fails to address court orders and seems to foreshadow the beginning of the end of the Cook Inlet commercial salmon fishery. Choose Proposal 2... State control with Federal oversight seems simple and fair.... and possibly

end some political influence. • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES. Thank you ... Susan representing the Hermansen-Jent family

Ben Doumit

Doumit Brothers Fishing

11/25/2020 08:41 AM AKST

I am a third generation Cook Inlet commercial fisherman, and have been fishing here since I was 11 years old. I hope that my children will have the opportunity to become fourth generation Cook Inlet fishermen, and participate in what could be again one of Alaska's greatest fisheries. The issues with this fishery cannot be resolved by simply shutting down large areas of the fishing grounds. By doing this you are implying that the problem is over harvest of the resource. There is no evidence to support this, and I can tell you from first hand experience that over harvest of salmon stocks in the federally managed Cook Inlet waters is not happening. The problem exists in the rivers and spawning grounds for both sockeye and king salmon. No one wants to listen to the scientists and fishery managers that were put in place to manage the resource. Instead decisions are being made by political figures that are basing decisions purely on politics, and not what is best for the resource. Fix the in river problems, get control of the gross over escapement, and get politics out of the decision making process and we can have our resource back.

Calvin Anderson

11/25/2020 08:30 AM AKST

To the members of the NPFMC, My name is Calvin Anderson, I live in Homer. While I went to school in Homer, myself and some of my school friends were lucky enough to get jobs at the fish dock in the harbor, not all at the same company. We got jobs unloading, sorting, cleaning up when the boats came back to port. We unloaded Halibut, black cod, rockfish, and salmon, mainly salmon. Most of our hours came from unloading salmon when the drift fleet was delivering to Homer. The faster boats would start arriving about 9pm the slower boat would come marching in as the sun was sometimes rising 3:30-4a.m. depending on where they were fishing till mid-July, when the fish moved north they told me then most of the boats did. A few of the very fast boats still on occasion came back to Homer a few times. I was lucky enough to save most of the money I earned for college, which helped a lot! Now I have moved on to another chapter in my life. In touching base with my old employer, they tell me your council is considering basically to close the southern end of Cook Inlet. I ask myself how fair is this, what about the next Calvin or Courtney that wishes to do the same, as I did? If you decide to close the southern end of the Inlet my old employer(which treated us extremely well as I'm coming to learn, in my new chapter of life)will not be looking to the hire high school kids like myself. As a high school kid good jobs are hard to find. I have inquired about the reasoning you are considering closing the door on kids like me. It does not make sense to me. Protect the fish here, but do not, protect them the same way some miles away. I know fish science is very complicated and mother nature has a way of reacting to human interference somewhat. From my years on the dock I have witnessed the loads coming in have sharply declined, in listening to skippers and looking at some online data, it is true!!!! I have more opinions from the data I have looked at but will choose to save them. In closing, do not forget about the next Calvin or Courtney that needs a job in Homer while in school. Do not close the southern end of the Inlet, (I guess you refer to it as the EEZ portion. Thank you ahead of time Calvin Anderson

Josh Newton F/V TRINITY
11/25/2020 02:01 AM AKST

As a life long commercial and sports fisherman of the State of Alaska like many others I have seen the Cook Inlet drift fishery dwindle away every 3 years when we come up for the board of fisheries, little by little area and time have been taken away for the greed of a user group spent on the destruction of the livelihoods of hundreds of people directly and Indirectly related to our fishery, with the current management plan we are no longer able to make a living i for one can not even make a boat and permit payment due to the poor fishing over the years and would like to be able to at least have the opportunity to pay the state what i owe, with that being said I am fully against amendment 4 and feel that amendment #2 is our best option at this time.

Derek Martushev
Cook inlet captain permit holder
11/24/2020 11:57 PM AKST

We need this fishery. I'm a 3rd generation fisherman. I love this fishery. We just need better management. To much politics in this area.

Mikaele Wong
Wong Seafoods
11/24/2020 10:23 PM AKST

I am a 3rd generation commercial fisherman and I strongly agree the following!! • APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Erick Stahlin
Alaska sports fisherman and boat owner
11/24/2020 08:49 PM AKST

It would be irresponsible to approve amendment 4, it was late in submission and unvetted. It is a special interests tactic which doesn't consider the overall sustainability of Alaskans. Approval of Amendment #2 is the only conscionable and reasonable course for decision. Alaskans make a living on the river and in the ocean guiding the sport fishing industry and providing commercial fishery aspects too, both industries can co-exist on a well managed fisheries protocol. Do not approve amend. #4. Keep Alaska alive and pursue by-catch regulation with a vengeance, stop drag fisheries from raping our waters, and tighten the trawlers fleets allowable off species catchment. Eliminate the wanton wastefulness of millions of fish and hundreds of millions in lost seafood revenue.

David Ivanov
11/24/2020 06:53 PM AKST

Closure of the middle of the Cook Inlet will not solve any problems with the fish returning. Poor management is the problem and this would make the problem worse. This is not a solution but in fact a problem. Alternative 2 is the right action to take get the state working with another entity and together put in place the right management plan. Peoples livelihoods are jeopardized with this new plan of closing the inlet waters. Under no circumstance should this be allowed or even considered.

Lisa Rodgers
Sakred Salmon
11/24/2020 06:37 PM AKST

Commercial fishing has been in my family for over 60 years in Cook Inlet. It's been passed down generation after generation. No matter who is managing it needs to be managed in a sustainable way and in a progressive manner. Facts have shown it hasn't bee. Salmon is important...WILD SALMON is important! The nutrition value AND the economic value is irreplaceable. APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Steve Webb
Cook Inlet Drift Fisherman
11/24/2020 06:21 PM AKST

I fished for salmon in Upper Cook Inlet since 1959, and drift fished since 1971, except for a dozen years in Bristol Bay. So now in response, to NPFMC's efforts to comply with Magnusen - Stevens; alternative 4, would close the area roughly from the south end of Kalgin Island to the south end of the district, the latitude of Anchor Point. Such a closure would render the final death blow to a fishery already hanging by a thread. Recent catch statistics bear this out. This result would be tragic especially in light of the fact that the Cook Inlet fishery could be brought into compliance with Federal Magnusen - Stevens MSY standards with simple changes to escapement goals, most notably in the Kenai system. I've fished both the Egegik fishery and the Kenai sockeye fishery. Both systems both have similar escapement goals of one million. Plus the Egegik rearing system, Becharof Lake has much larger rearing capacity, in terms of surface area and much deeper photosynthesis for zooplankton due to clear water. Egegik has catch numbers in recent years of 8-14 million. The Kenai is lucky to produce catch numbers of 2 million in recent years. If a clearer example of chronic over escapement exists, I don't know of it. It would be tragic to kill off an economic engine such as the upper Cook Inlet salmon fishery when a simple solution is at hand; with State management changes, with NPFMC oversight.

Sonja Woodman Corazza
Individual
11/24/2020 05:20 PM AKST

My family has been fishing in Cook Inlet since 1939, that is 81 years. This fishery is a historical and viable fishery that is being destroyed by poor management and Board of Fisheries decisions that have been trying to eliminate it altogether and give it to the sports fishing industry. In the 1980's I was the commercial fisheries representative on a committee with Tom Eliason of Anchorage and together we worked hard and came up with what we believed was a fair solution for all participants in the fishery. It was accepted by the commercial fishermen and rejected by the sportsmen because their goal was for the commercial fishery to be eliminated. Alternative # 4 is a blatant, illegal and unvetted proposal that should not be considered at all. The Federal Court has directed Alaska to solve this fishery problem and to abide by the requirements of the Magnuson-Stevens Act and the 10 National Standards as required by law. I fished Cook Inlet before the Magnuson Act was law and the foreign fleets just about decimated our salmon runs so we as commercial fishermen fought hard for years to implement the 200 Mile Limit. We fought for it, saw the difference when it was passed and now we are being unfairly targeted. "Commercial fishermen" in Alaska means families who live in our small coastal towns and support our local businesses, schools, boat harbors and more. I support a joint legal fisheries management plan between the State of Alaska and NPFMC/NMFS so that no group can be unfairly targeted by power

politics. I support alternative #2 with the addition that management must comply with the Magnuson-Stevens Act and the National Standards. As a born Alaskan and a lifelong fisherwoman I am distressed that our State government is attempting to eliminate a historical and important economic base for the people plus a business that supplies the healthiest protein on the planet for ourselves and the world. Please do not ignore the towns and villages and people of Alaska who rely on the fisheries, please legally implement good fisheries management in compliance with the directives of the Ninth Circuit Court that says the fishery needs to be managed as a unit. Thank you.

Nancy Scow
Scow Fishing
11/24/2020 12:15 PM AKST

This could kill the Kenai peninsula Economy by taking away local jobs and revenue •
APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-
STEVENS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4
ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD
COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT
OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENS ACT, COMMON
SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND
ECONOMIES.

Mark Stewart
11/24/2020 11:16 AM AKST

Commercial fishing has been a part of Cook Inlet for generations and alternative 4 would wipe out and entire industry in Alaska. My family and I have been part of Commercial fishing in Cook inlet long before I bought my Boat and permit. The communities and individuals need the commerce that is brought by fishing. I personally spend between 10,000 to 20,000 a year on goods, services and fuel. it all goes to the communities around cook inlet as well as the State. Please consider alternative 2. Thanks
Mark Stewart, Commercial fisherman.

Bill Holt
11/24/2020 11:13 AM AKST

RE: C2 Cook Inlet Salmon FMP – Final Action To whom it may concern: I have been a commercial fisherman in Cook Inlet since 1971, both set and drift net. Please approve alternative 2 with amendments to comply with magnuson-stevens act national standards as required by law. Please reject alternative 4 entirely. This was unethically late submitted, is unvetted, and would collapse the longstanding viable cook inlet salmon fishery in direct opposition to the requirements of the Magnuson-Stevens act, common sense, and the benefit and sustainability of the local communities and economies. thank you. Bill Holt

Stephen Vanek Jr
11/24/2020 11:09 AM AKST

I have drifted in the Inlet for 55 years. None of the alternatives addresses the 9th Circuit's decision. I am opposed to all of them. Alternative four will close commercial fishing in the Inlet. It is favored by the State who has been trying to close commercial fishing for years. A fishing disaster has been requested for pink salmon and sockeye salmon. The bulk of pinks and sockeyes are caught by drift fishermen in federal waters. The setnetters in state waters cannot catch all of the pinks and sockeyes especially when under state management they are closed like they were this last summer. Those fish which are a national resource are wasted in violation of the ten national standards of MSA. With salmon we cannot have two sets of managers. The 9th Circuit Court says that the fishery needs to be managed as a unit. MSA must apply to the whole fishery. None of the alternatives do that. Stephen Vanek, Jr.

Elijah J Porter
Snug Harbor Outpost
11/24/2020 10:51 AM AKST

I have been fishing these waters as a drift gillnetter before I could walk. My Dad has been fishing these waters commercially before he could walk. My Grandfather fished these waters from the age of 20. I was hoping to see my own kids in this fishery. This has been a sustainable fishery for many, many years. What has changed? The board of fish is political and does not make decisions based on science. Of the options presented, Alternative 2 appears to be the best avenue in terms of allowing for maximum sustainable yield. The introduction of Alternative 4 is just another example of the current political nature of this fishery. Please help us protect and preserve this amazing fishery for generations to come by breaking up the political climate of this fishery and allowing science to prevail.

Marvin Bellamy
fisherman
11/24/2020 10:36 AM AKST

I have fished in Cook Inlet since I was ten years old. I am 74 yr old now and continue to fish. There have been many changes in the number of other user groups over the years that have put pressure on the commercial fishery. It should be managed to be shared in a sustainable practice that is outlined in the Magnuson-Stevens Act. The commercial fisheries are an integral part of Alaska's coastal communities, benefiting local economies and supporting a long standing way of life. Approve Alternative 2 with amendments to comply with Magnuson-Stevens Act Ten National Standards as required by law. Reject alternative 4 entirely. This was unethically late submitted, is unvetted, and would collapse the longstanding Cook Inlet Salmon Fishery in direct opposition to the requirements of the Magnuson-Stevens Act, common sense, and the benefit and sustainability of the local communities and economies.

Annette Bellamy
commercial fisherwoman
11/24/2020 10:21 AM AKST

I have fished in the Cook Inlet gill net fishery for 46 years and witnessed a drastic shift in management policies that have had extreme impacts on the commercial fishing fleet, diminishing annual catch per vessel and repeated over escapements. The Cook Inlet commercial fisheries is foundational to our local economies, supporting many fishing families, processors, local businesses, and municipalities. The commercial fisheries has been a model of sustainability and an important part of coastal community life in Alaska. Approve Alternative 2 with amendments to comply with the Magnuson-Stevens Ten National Standards as required by law. Reject Alternative 4 entirely. This was unethically late submitted, is unvetted, and would collapse the longstanding viable Cook Inlet Salmon Fishery in direct opposition to the requirements of the Magnuson-Stevens Act and the benefit and sustainability of the local communities and economies.

Maddie Lightsey
Alaska Boats & Permits, Inc.
11/24/2020 10:09 AM AKST

Regarding the December meeting and final action on the Cook Inlet FMP: Alternative 4 - a late addition to a process otherwise given a lot of thought, energy, and resources - would negatively affect local fishermen, processors, businesses, and the Kenai Peninsula's economy at large in myriad ways. Alaska Boats & Permits, Inc. has been in business almost 24 years now. While we aren't directly involved in the Cook Inlet fishery, our business depends heavily on its existence and Amendment 4 would directly affect us. Cook Inlet fishermen make up a large portion of our clients, and the sales and

transfers of Cook Inlet salmon permits and fishing vessels constitutes a substantial percentage of our revenue. We do not support Alternative 4, which advocates for the closure of commercial salmon fishing in the EEZ of Upper Cook Inlet and which would effectively eliminate the entire Upper Cook Inlet commercial salmon fishery. We have seen firsthand the demise of the Upper Cook Inlet drift fishery, due in part to poor management and political intervention: permit values have fallen from a high of around \$240,000 to today's value of about \$23,000; values of drift vessels for the fishery have fall similarly; many of our clients have suffered financial loss to the point of bankruptcy; and we have seen the revenue from our sales of Cook Inlet permits and vessels decline sharply. We support joint management of the Upper Cook Inlet salmon fishery by the State of Alaska and NMFS, based on sound, science-based policies. With the proper management procedures in place, the Upper Cook Inlet fishery has the potential to be a vibrant resource for decades to come. Please reject Amendment 4.

Ken Coleman
Cook Inlet Setnetter
11/24/2020 09:06 AM AKST

My family and I own and actively fish multiple set net sites midway between the Kenai and Kasilof Rivers. Should we be able to prosecute an orderly fishery in the upcoming year, it will be my 49th season. I'm writing, as it appears most are, to implore the Council to reject proposal #4 and adopt proposal #2. Should the Council adopt #4 I fear dire consequences. The Cook Inlet drift fleet will bear the burden of being banished from traditional catch areas, greatly reducing economic opportunity. Recent Board of Fisheries decisions have reduced time and area to not only the drift fleet but also the Eastside setnetters. The effect of that is both gear groups are experiencing less catch thus less economic viability. The same is true for our partner seafood processors, less catch, less catch distribution across the span of the season....less economic viability. We greatly fear that our remaining processors may chose to leave Cook Inlet due to less viability, which will effectively end commercial fishing in Central Cook Inlet as we know it. Proposition #4 hasn't been properly vetted as to the economic and scientific consequences to the fishery, and, in my opinion, was submitted by the State to the Council to bypass having any meaningful discussion relative to the above. In essence "taking the easy way out". In addition, the proposal appears to violate a number of the Magnuson-Steven Act national standards, specifically Standards 1,2,4 and 8. Cook Inlet drift fishers have worked the waters of Cook Inlet since 1947, traditional users to be sure. Cook Inlet setnetters have worked the near shore waters of Cook Inlet since 1878, traditional users to be sure. Both groups are important parts or our local diversified economy. I urge the Council to do the difficult work to pass Proposal #2, reject Proposal #4 and safeguard our Cook Inlet fishers, processors and associated local businesses.

Charles Ruppenthal
Lower Cook Inlet Seiner
11/24/2020 07:53 AM AKST

Seems a little disingenuous to add Alternate 4 so late in the process with little or no discussion amongst user groups, especially considering it's draconian effects to many of those user groups. State control with federal oversight seems simple and fair.

Zachary Markham
Kenai Salmon Company
11/24/2020 06:00 AM AKST

As an owner and permit holder I am sad that we even have to defend our livelihood and business interests from those that would seek to destroy it. I ask you to: • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE

COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSON ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Dane Markham
Kenai Salmon Company
11/24/2020 05:47 AM AKST

As a 2nd generation fisherman and permit holder I ask that you: • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVENSON ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSON ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Simeon Daigle
11/23/2020 11:55 PM AKST

Dear North Pacific Fishery Management Council representatives, I am a third generation Alaskan and a second generation commercial fisherman. I have spent every summer of my life in the Cook Inlet commercial salmon fishery. Most of it in lower Cook Inlet and now for the last decade in upper Cook Inlet as well. My entire livelihood revolves around the commercial salmon fishery. As a fisherman in the summertime and an aluminum boat builder in the winter. If you take into account my extended family there are 11 Cook Inlet Salmon permits within my family. Needless to say my commercial salmon fishing heritage runs deep. I am deeply concerned about the upcoming decision regarding the future of commercial fishing within Cook Inlet and would respectfully ask you to consider those of us upon whom your decisions will have a great impact. I ask you to reject Alternate 4 and to Approve Alternate 2 with the amendments to comply with the Magnuson Stevens Act standards. Thank you for your service and consideration. Please allow us to pass on our commercial salmon fishing heritage to the next generations. Sincerely , Simeon Daigle

Charles Elliott
Kenai Resident sport and commercial fisherman
11/23/2020 09:36 PM AKST

It would dereliction of responsibility for the approval of amendment 4 to go through. it was late in submission and unvetted. It is a special interests tactic and life/industry destroying approach to fisheries management. Approval of Amendment #2 is the only conscionable and reasonable course for decision. I am a third gen Alaskan my family drifted and set net the Cook Inlet and continues to do so well into its 3rd generation. We also have members of our family that make a living on the river in the sport fishing industry and they all understand both industries can co-exist on a well managed fisheries protocol. Do not approve amend. #4. Keep these industries alive and pursue by-catch regulation with a vengeance, stop drag fisheries from raping our waters, and tighten the trawlers fleets allowable off species catchment. Eliminate the wanton wastefulness of millions of fish and hundreds of millions in lost seafood revenue.

Lynne Laichak
FV Jade IX
11/23/2020 07:18 PM AKST

A Cook Inlet drift permit and fishing vessel has been in our family for over 40 years and 3 generations now. My parents bought the Jade IX in 1979 and we've been fishing it ever since. As a

result we've been around for all the best years of fishing and all the worst. Fishing in the late 1980's was loading the boat to the point of plugging the scuppers to keep it from sinking. In those days, the maximum escapement up the Kenai River was between 600,000 to 800,000. And each year was producing abundant returns when those salmon fry would come back 5 or 6 years later. There was plenty of fish for the commercial fishermen and the sport fishermen. The entire inlet was open to fishing for each twice a week opening. The revenue for a fisherman was nearly \$100,000 some years, making it a decent way to make a living and making it possible to cover the cost of the permit and boat. The local economy in Kenai also saw the enormous benefits of those well managed years. But now the management style has changed so much that this year, 2020, had to be declared a disaster. And why? The fishery managers have been shutting down the commercial fishermen to the point of allowing too many fish up the rivers. This means the tiny fry in the the lakes and streams have too much competition for food and the result is much smaller fish 5 or 6 years later and less of them. The fishery managers this year shut down commercial fishermen to corridor fishing only, where there were no fish. As a result, they over escaped the river AGAIN!! Fishery managers need to return to managing the Cook Inlet for maximum yield. In order to sustain a healthy fishery for this generation and the all the future generations. That means a maximum escapement of between 600,000 to 800,000. And opening the entire Cook Inlet to commercial fishing twice a week. That easy management style produced the best years for fish and the best years for fishermen.

Philip Sheridan
ESSN

11/23/2020 05:55 PM AKST

I have setnet with my family in Cook Inlet since 1985 and can say we have employeed hundreds of people over the years and still maintain a crew of 4 all Summer. This fishery is critical to the local economy and vital for our youth who get jobs and learn how to work hard and aspire to have their own business. Please reject alternative 4 completely and approve alternative 2 with amendments to comply with the Magnuson Stevens Act National Standards.

Audrey Salmon

an employee that survives because of the commercial fishing industry

11/23/2020 02:36 PM AKST

I have worked in the commercial fishing business for over 15 years. Alternative 4 is no more than a vindictive measure introduced by the State of Alaska as a revenge move against Cook Inlet Commercial Fishermen. The Ninth Circuit ruled an FMP must be developed as Cook Inlet requires 'conservation and management'. Rejecting Alternative 4 and adopting Alternative 2 with amendments to comply with MSA puts the NPFMC and the State in legal compliance. At the present time, the entire Cook Inlet commercial fleet's fate rests in your hands, please do not vote to put over 1,000 fishing families out of business. REJECT ALTERNATIVE 4!

Celina (Jackson) Nerison

11/23/2020 02:27 PM AKST

I started fishing in Cook Inlet when I was 16, alongside my siblings, parents, and grandparents. This last summer was my 9th summer fishing on Salamatof, and now I get to fish alongside my husband, and occasionally bring our children to watch. Unfortunately, every year we feel the repercussions as the restrictions get more stringent and the openings happen less and less frequently. It has been absolutely maddening to watch this fishery decline. Every year, my entire family puts in hours and hours of preparation for a "normal" season of fishing and every year, we are disappointed. For these reasons and more (I could probably go on all day..) I attach my name to this request, along with many others hardworking fishermen who feel the same way I do. APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVENS ACT NATIONAL STANDARDS

AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSONS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Tony D Jackson
McJack Fishing
11/23/2020 02:00 PM AKST

It is extremely disappointing to watch as people make decisions that will affect my families business. We have been working together for years. My father in law started fishing on the same beach we are on in 1957. There are currently three generations of family working on the beach together, at times there are four on site. Commercial fishing in Alaska, and specifically Cook Inlet, needs to be preserved. APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVENSONS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSONS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Leah Jackson, lifelong Nikiski resident and set net permit holder
McJack Fishing
11/23/2020 12:25 PM AKST

As a permit holder and lifelong Nikiski resident, I feel strongly about the issues at hand. My father has fished Cook Inlet since 1959, first as a set net fisherman, then for over 30 years as a drift fisherman, and now at age 84 he is partner in our family owned beach site and fishing once again. Fishing means everything to 4 generations of our family. Yet year after year our fish days are fewer and fewer due to mismanagement. Instead of managing this fishery according to biology, the commissioner and others consistently and vehemently favor the in-river sport fishery, intentionally restricting and attempting to eliminate commercial fishing. PLEASE protect Cook Inlet commercial fishing. We implore you to care about this fishery like we do. We respectfully ask that you consider the following recommendations: approve ALTERNATIVE 2 with amendments to comply with the Magnuson-Stevens Act national standards as required by law. Fully REJECT Alternative 4 which was unethically submitted late and would collapse the Cook Inlet salmon fishery. Alternative 4 is in direct opposition to the requirements of the Magnuson-Stevens act. Our local fishery, community, and economy deserve your care and protection. Please listen to the comments made here by local fishermen. Our voices should matter. <{>

Nikolai Yakunin
Old Believer village of Nikolaevsk
11/23/2020 10:00 AM AKST

Mr. Kinneen: Participation in the development of a New/Legal FMP (MSA compliant) by the Old Believer village of Nikolaevsk began with the letter of January 30 2018 addressed to Jim Armstrong. The letter identified Nikolaevsk's nominees for the Cook Inlet Salmon Committee. (See attached letter). NOTE: Approximately one third of all Cook Inlet Salmon Drift Permit holders reside in Nikolaevsk and the other Cook Inlet area Old Believer villages. This letter is to express Nikolaevsk's choice of alternative 2 (expanded scope) and to reinforce the committee's consistent support for Council action to fulfill alternative 2 (expanded scope) In addition, the states "late hour" submission of alternative 4 seems to be a final proposition, condition or demand on Cook Inlet commercial salmon

fishermen, one whose rejection will end negotiation and cause a resort to force or other direct action by the state against salmon fishermen in Cook Inlet. In light of how, for decades, the state has mismanaged the Cook Inlet Salmon fishery in violation of MSA , alternative 4 seems to express an attitude by the state that they own Cook Inlet Salmon and can give them to whom ever they please for what ever reason. Ultimatums and attitude like these necessitates vigilant oversight, accountability, and enforcement with meaningful consequences applied in a timely way. Fishermen must obey rules under penalty of fines and loss of permit. The same should apply to those in position of leadership and management. Finally, for the sake of the economic and social health of Nikolaevsk and all the other small fishing villages relying on the Cook Inlet Commercial salmon fisheries and for the sake of our nations "Rule of Law" alternative 2 (expanded scope) is the only reasonable choice. Thank you for your efforts.

TED CROOKSTON

KPFA

11/23/2020 09:23 AM AKST

1. Federal Authorities are being Alerted to unethical inclusion of Alternative 4
2. Demand Alternative 4 be removed from the list of options at December meeting
3. Demand an investigation into ethics violations and collusion by Gov. Dunleavy and Commissioner Vincent-Lang
4. Demand comment window be extended until the December meeting begins.

Andrew Milauskas

Cook Inlet Salmon setnet fisherman

11/23/2020 08:19 AM AKST

It is hard to understand why a proposal, Alternative 4, would even be made. A proposal which would destroy a great number of small, family businesses and a big economic driver for the Cook Inlet region. Instead of fixing the issue of scientifically managing the Cook Inlet commercial salmon fisheries, as ordered by the courts, the Dunleavy Administration and the State of Alaska are attempting to get rid of them, at the price of families and communities in the region. As such, I strongly oppose Alternative #4. I support Alternative #2, amended to comply with the Magnuson-Stevens Act National Standards, as is required by law. Do not destroy the commercial fisheries in Cook Inlet due to politics.

Brent Deakins

Azarel Fisheries

11/23/2020 06:54 AM AKST

We had only 5 fish openings in 2020. Two of those were only half days for us due to the tides. The commissioner seems to be calling the shots instead of the biologist. Over a million sockeyes escaped into the Kenai River. Those are the target fish of the Upper Cook Inlet Commercial fishermen. Does it sound like a poor run? Or perhaps management problems? We ask you to preserve our way of life and this viable fishery. • APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Hannah Harrison

11/23/2020 05:23 AM AKST

I'm writing to express my concern about alternative 4 that has been proposed for the management of Cook Inlet salmon fisheries. As a fisheries researcher with a history of work and research on Cook

Inlet fisheries, I believe alternative 4 would be devastating to the region's fisheries, economies, and coastal communities for a variety of economic, and socio-cultural reasons. Further, such a radical policy action would create significant management challenges for an escapement-based system. Allowing the Kenai/Kasilof and other rivers in the area to significantly over-escape, which would certainly be the case if commercial fisheries in Cook Inlet were eliminated, would likely result in long-term decline of salmon numbers to these systems. Previous research has also demonstrated the importance of commercial fisheries in this area to food security for non-commercial fishers. Many commercial fishers direct-market, gift, or trade their salmon to members of their communities, providing a critical link for many people to local protein sources. Cook Inlet fisheries also are an important link within the ecosystem of fisheries processing in Alaska. Having a diversity of salmon fisheries from which to buy and process fish is essential for processors, particularly in our changing climate where once-reliable fisheries are now less stable and more prone to bad years. Finally, as a social scientist, I am gravely concerned about how alternative 4 ignores repeated calls from the scientific community (and beyond) to prioritize equity between user groups in this system, and to create an atmosphere of more stable and predictable policy changes that make participation in the fishery easier for all user groups. This alternative achieves the opposite, and will likely ignite an already tenuous peace between user groups in UCI. As such, I STRONGLY advise against alternative 4. Please see the following resources for empirical evidence supporting the above claims: Food security on the Kenai Peninsula:

https://www.researchgate.net/publication/306012426_Urban_harvests_Food_security_and_local_fish_and_shellfish_in_Southcentral_Alaska?_sg=-

XJeyS6dAfqrYPE9VgGqWo1RbgSB7SUyjcPiJycBhqg1Hgl3pS3sStYT8SdIGdv8OobXlqVcY_oZe04WKNexXLveQ8ogwHnIMXvI_Sa.4LYU7ie1UpcAkspZzDGjtZI937qV9S-

VA0B2ilv9UKeTCF9TCLC1DMJTbytnjOP3sg9liiyELPXSgrNiOqdA8Q More food security:

https://www.researchgate.net/publication/236988064_Seafood_as_Local_Food_Food_Security_and_Locally_Caught_Seafood_on_Alaska's_Kenai_Peninsula?_sg=xUqme5REBV1WxOw49wSNsDb7rMNR5ndDB62yu9QgmraY6l_moMj_oQDb2HA9UuMc1iFBjLsgP7WolAdAN5n0tho3ESngfoly_nBmYphw.oCgb9L7vqqTTs6O4U7L9BXwJCEzGxEq2Sok1baReKch8F3hDlluupIJe_mrsMIIReFxr8hxgXmKxZXvgSg-mg Conflicts within UCI fisheries:

https://www.researchgate.net/publication/267751712_Larger_Than_Life_The_Emergent_Nature_of_Conflict_in_Alaska's_Upper_Cook_Inlet_Salmon_Fisheries?_sg=h5JbbFSuHtjeI9oxMMUiyJ-cJfFXv7i1q7uIt1jIEpEwAh1f0LZXBByiEZmk6jTKa3cF_4HLKG7cOW3Hi6SCN3kKLh5BAhLSSFk40ss_R.ajkcrZIAXi4AObOugifhAzQM-scWjZp5rpeODIuinJohlz8W8re2OTMlzHz4PikvLeVWFsPi1RC6KE2Un-fLxw

Sustainability of Cook Inlet fisheries in the context of diverse fisheries and user group conflicts:

https://www.researchgate.net/publication/256589551_Local_Perceptions_of_the_Sustainability_of_Alaska's_Highly_Contested_Cook_Inlet_Salmon_Fisheries

Vern Jamison

Cook Inlet Salmon Drift fisherman

11/22/2020 08:53 PM AKST

Dear chair and all North Pacific fishery management council representatives. We need approval of Alternative 2 with Amendments to comply with Magnuson-Stevens Act National standards as required by law. I have been a Drift fisherman in Cook Inlet for 47 years. I reject Alternative 4 that is intended to completely dismantle our 100 year old fishery. The state of Alaska and some of the BOF cohorts are preventing the Biologist from using sound science to set sensible Escapement goals. The BOF escapement goals are set excessively high in order to keep us in the corridor where there are few fish or on the Beach during the peak of the Salmon run, that has resulted in excess of a million fish each year for the last 2 years beyond the already excessive escapement goal set by the Bof. Excessive spawners left to rot on the banks of the Kenai River. A loss of millions of dollars to our industry. This is the worst fishing season in my 47 years in Cook Inlet I have ever had. This disaster could easily have

been prevented. A change in policy must come soon or we are done. I do appreciate the time you have taken to read my concerns. Thank you.

Sarah Crookston
Fair Fishing 907
11/22/2020 08:11 PM AKST

I am appalled at the lack of ethics in Alaska government right now! • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Glen Mathew
Cook Inlet permit holder
11/22/2020 04:31 PM AKST

I'm not sure why your trying to take our fishery that we have had for years,we depend on these fish to feed the world also our families..most of the sport fish that get caught get thrown away or fed to sled dogs..I have been fishing Cook Inlet since 1981 and these fish r apart of my life and have been for years.If u want fisherman out of the picture then buy our boats permits and all of our gear that we own and destroy something that I love and that has been a piece of my life for a long time.

Charles McEldowney
11/22/2020 02:08 PM AKST

Dear Chairman and North Pacific Fishery Management Council representatives, Regarding the Cook Inlet Management plan, please reject alternative 4. Closing the fishery would not be beneficial to any party involved. Alternative 2 with changes made to comply with the Magnuson-Stevens Act would be the most appropriate. I have been in the seafood processing business for 35 years and continue to be involved as a fisherman.

Paul C Fleenor
F/V Clara Lee/ SO3H Permit holder and Edgewater Marine Surveyors LLC of Homer, Alaska
11/22/2020 12:13 PM AKST

November 22, 2020 Mr. Simon Kinneen, Chair North Pacific Fishery Management Council 1007 West Third, Suite 400 Anchorage, Alaska 99501 Re: Final action on Item C2, the Cook Inlet Salmon FMP to the Chair and members of the NPFMC: Dear Chairman and all North Pacific Fishery Management Council representatives, In your upcoming December meeting you will be selecting from a range of 4 alternatives and taking final action on the Cook Inlet Salmon FMP. I am extremely concerned about the recent addition of Alternative 4 to the range of options that was introduced last minute by the State of Alaska representatives on the Council. We are very much opposed to Alternative 4 as it would have a significant negative financial effect on our local fisherman, businesses and our local communities. Our local fisherman, businesses and towns benefit greatly from the upper Cook Inlet commercial salmon fishery and have so for over six decades. We do not support Alternative 4 which advocates for the closure of commercial salmon fishing in over half the designated area in Upper Cook Inlet that the commercial fleet needs to harvest salmon. Supporting Alternative 4 would effectively eliminate the entire upper Cook Inlet commercial salmon fishery. The upper Cook Inlet drift fleet is already burdened to the point of bankruptcy by politically motivated area closures of this type during the fishing season. We support joint management of the Cook Inlet salmon fishery between the State of

Alaska and NPFMC / NMFS using the directions of a legal Fishery Management Plan that is compliant to the Magnuson - Stevens Act including the Ten National Standards. We support applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Sincerely, Paul C. Fleenor F/V Clara Lee/ SO3H Permit holder Edgewater Marine Surveyors LLC of Homer, Alaska

Karen and Richard McGahan
11/22/2020 07:06 AM AKST

We had only 5 fish openings in 2020. Two of those were only half days for us due to the tides. The commissioner seems to be calling the shots instead of the biologist. Over a million sockeyes escaped into the Kenai River. Those are the target fish of the Upper Cook Inlet Commercial fishermen. Does it sound like a poor run? Or perhaps management problems? We ask you to preserve our way of life and this viable fishery. • APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVENSON ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSON ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Ann Dixon
11/21/2020 07:57 PM AKST

I'm a senior citizen, widowed, no longer able to dipnet for my yearly salmon needs. If you shut down this fishery, I'll have no source to purchase my salmon. This fishery provides a living for the local fisherman and his family who supply my salmon and is a source I depend upon for my fish. Salmon is a mainstay of my diet and health. Please do not eliminate or reduce this fishery.

Rev Tim H Tolar
ELDoNA, UCIDA, NFD
11/21/2020 05:32 PM AKST

Dear Chair and all North Pacific Fishery Management Council representatives, In your upcoming December meeting you will be selecting from a list of four alternatives and taking final action on the Cook Inlet Salmon FMP. I am extremely concerned about the recent addition of Alternative 4: Federal management of the commercial fishery in the EEZ with the EEZ closed to commercial fishing to the range of options. This option was introduced at the last minute by the State of Alaska representatives on the Council. I am very much opposed to Alternative 4 as it would have a significant negative financial effect on the local fisherman, businesses, and communities around Cook Inlet. Our local fisherman, businesses and towns benefit greatly from the upper Cook Inlet commercial salmon fishery and have so for over six decades. I do not support Alternative 4 which advocates for the closure of commercial salmon fishing in over half the designated area in Upper Cook Inlet that the commercial drift fleet needs to harvest salmon. In recent decades this area has been the most productive area for the drift fleet so eliminating it will eliminate the fleet which in turn will eliminate the on shore processors and multitude of support businesses. Supporting Alternative 4 would effectively eliminate the entire Upper Cook Inlet commercial salmon fishery. The Upper Cook Inlet drift fleet is already burdened to the point of bankruptcy by politically motivated area closures of this type during the fishing season. I support joint management of the Cook Inlet salmon fishery between the State of Alaska and NPFMC / NMFS using the directions of a legal Fishery Management Plan that is compliant to the Magnuson - Stevens Act including the Ten National Standards. I support applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Sincerely, Rev. Tim H. Tolar Evangelical Lutheran Diocese of North America

Pastor, Saint Luke Lutheran (UAC) - Kenai, Nikiski, & Homer AK Chaplain/Firefighter/EMT, Nikiski Fire Department - Nikiski, AK Firefighter/Confined Space Technical Rescue Technician/EMT, Marathon Petroleum Kenai Refinery - Nikiski, AK Captain, F/V ICHTHUS - Kenai, AK

Michael C. Hatten

Cook Inlet Drift fisherman since 1986 (34 years)

11/21/2020 04:46 PM AKST

I am strictly against the Alternative 4. This is nothing more than the State of Alaska's board of fisheries attempting to completely destroy our fishery. The problem with our fishery is not the fishermen catching too many fish, it is the State of Alaska allowing way to many fish to escape into the river systems to spawn. Jeff Fox, who was our fisheries biologist over 20 +/- years proved that the Kenai River only needs 750,000 red salmon to escape to provide a maximum return. Not 1.5 MILLION - 2 MILLION Red Salmon (2020 Kenai River Red Salmon over-escapement) along with an estimated 2 million pink salmon, which will do more harm to our fishery due to over escapement, over-kill caused when the later run fish end up destroying earlier egg beds, and starvation caused by too many fish and not enough food in the lake system to feed the young. The State allowing this over escapement year after year is their attempt in destroying our fishery in favor of the sports fishery A re-allocation of natural resources. The State of Alaska has been on a re-allocation mission now for over 15 years In favor of sport fisherman. The 9th circuit Court in their decision ordered the State of Alaska to FIX the problem and come into compliance with the Magnuson-Stevens Act. Not to just get rid of the problem. To adopt Alternative 4 would be not only ignoring our high courts decision in this matter, but would be a slap in the face of common sense. Better yet, If the State of Alaska board of fisheries is so adamant that our drift fleet is the problem, then let the State of Alaska sponsor a State buy-back program to reduce the number of permits allowed to fish. This would solve their allocation problem. But of course that will never happen will it?

Audrey Russell

11/21/2020 03:51 PM AKST

APPROVE ALTERNATIVE 2 My father has been fishing in Cook Inlet for decades, and has put everything he has into the Cook Inlet Drift Fishery. As his daughter and occasional deckhand, I have witnessed firsthand how poor management and a disregard for basic ecology has put the fishery at risk. The Dunleavy administration has unfairly restricted commercial fishing to the point of nearly destroying the industry. It's indicative of a greater disregard for small business and commercial fishermen, both of which are central to the state of Alaska and its economy. To follow Alternative 4 would not only deny the hard-working fishermen of Cook Inlet with the right to earn a living and serve their communities; it would also deplete the area of Alaska's most important natural resource and severely damage the natural ecosystem of Cook Inlet. For the sake of the fishermen, their communities, and the Alaskan economy, follow Alternative 2. It's the only sustainable option there is, and it's the only thing that will keep our fisheries viable. Put the fishery in the hands of the people who understand it most: the ecologists and fishermen whose livelihoods are centered around Cook Inlet and its fishery. It is possible to avoid the collapse of Alaskan fisheries and to manage them in an ethical, sustainable way. I hope that the Council has the conscience to do so.

Julia W. White

11/21/2020 01:02 PM AKST

I have family members that have fished in Cook inlet for nearly 60 years. I am extremely concerned about the recent addition of Alternative 4 to the range of options that was introduced last minute by the State of Alaska representatives on the Council. I am very much opposed to Alternative 4 as it would have a significant negative financial effects on our local fisherman, businesses and our community. My family of fishermen, businesses and towns benefit greatly from the upper Cook Inlet

commercial salmon fishery and have so for over six decades. We do not support Alternative 4 which advocates for the closure of commercial salmon fishing in over half the designated area in Upper Cook Inlet that the commercial fleet needs to harvest salmon. Supporting Alternative 4 would effectively eliminate the entire upper Cook Inlet commercial salmon fishery. The upper Cook Inlet drift fleet is already burdened to the point of bankruptcy by politically motivated area closures of this type during the fishing season. We support joint management of the Cook Inlet salmon fishery between the State of Alaska and NPFMC / NMFS using the directions of a legal Fishery Management Plan that is compliant to the Magnuson - Stevens Act including the Ten National Standards. We support applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Thank you, Julia White

Russell Parks

11/21/2020 12:43 PM AKST

November 21, 2020 Mr. Simon Kinneen, Chair North Pacific Fishery Management Council 1007 West Third, Suite 400 Anchorage, Alaska 99501 Re: Final action on Item C2, the Cook Inlet Salmon FMP to the Chair and members of the NPFMC: Dear Chairman and all North Pacific Fishery Management Council representatives, In your upcoming December meeting you will be selecting from a range of 4 alternatives and taking final action on the Cook Inlet Salmon FMP. We are extremely concerned about the recent addition of Alternative 4 to the range of options that was introduced last minute by the State of Alaska representatives on the Council. We are very much opposed to Alternative 4 as it would have a significant negative financial effects on our local fisherman, businesses and our community. Our local fisherman, businesses and towns benefit greatly from the upper Cook Inlet commercial salmon fishery and have so for over six decades. We do not support Alternative 4 which advocates for the closure of commercial salmon fishing in over half the designated area in Upper Cook Inlet that the commercial fleet needs to harvest salmon. Supporting Alternative 4 would effectively eliminate the entire upper Cook Inlet commercial salmon fishery. The upper Cook Inlet drift fleet is already burdened to the point of bankruptcy by politically motivated area closures of this type during the fishing season. We support joint management of the Cook Inlet salmon fishery between the State of Alaska and NPFMC / NMFS using the directions of a legal Fishery Management Plan that is compliant to the Magnuson - Stevens Act including the Ten National Standards. We support applying the best scientific management practices to ensure the sustainability and viability of this nationally important economic natural resource for generations to come. Sincerely, Russell P Parks PO Box 8336 Tacoma, WA 98419

Joye Hampton

Azarel setnet fisheries

11/21/2020 12:09 PM AKST

Commercial fisheries in Cook Inlet simply cannot be shut down. Generations of families lives depend on this fishery. It would be a detriment to the economy of not only the Kenai Peninsula but to the state of Alaska!! Please consider the families and economic impact this would have!! **APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH THE MAGNUSON-STEVENSONS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSONS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.**

Daniel Norman

Concerned citizens against the corruption of ADFG, Gov Dunleavy, and KRSA

11/21/2020 09:44 AM AKST

• APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Chad Waggoner

Chad and Sons LLC

11/21/2020 09:06 AM AKST

As a third generation east side setnetter I respectfully would recommend the following. • APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Jason Hudkins

11/21/2020 12:31 AM AKST

To whom it may concern. My name is Jason Hudkins and I have fished the waters of Cook Inlet for 20 years. I am the owner of a valid CFEC Cook Inlet salmon permit and run a small family fishing business with my wife and children on the Kenai Peninsula. I would kindly ask you when voting on this issue to keep in mind the impacts your decisions will have on the local communities, the fishing community, and most importantly how your decisions will affect the fishing resource. For the record I • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES. Thank you for taking the time to read and consider my comments.

Dominik Efta

11/20/2020 10:54 PM AKST

Hello, my name is Dominik Efta and I am currently a second year college student. I am a third generation drift gillnet fisherman in Cook Inlet and have been running my late father's boat for the last 3 years and have been part of the fishery since I was 11 years old. The fishery was very productive and sustainable my first few years fishing and has steadily declined due to the state's management since it has not complied with the Magnuson Stevenson Act to any extent. I fully support alternative 2 and very actively oppose alternative 4 which should not even be a consideration. Closing off the EEZ would result in a fishery that does not comply with the Magnuson Stevens Act, even more so than the current state management, and would eliminate the commercial salmon fisheries of Cook Inlet within a matter of a handful of years. With alternative 4, the Cook Inlet fisheries would be destroyed since processors would leave due to a lack of salmon harvested as well as many fishermen being forced to leave due to

the lack of finances-the capital investment for Cook Inlet commercial salmon operations is far too large for its current returns. Separate from commercial fishing, the larger sustainable salmon returns to the Kenai and Kasilof rivers' would be at risk largely due to the resulting overescapements in both rivers, affecting user groups other than commercial salmon fishermen in Cook Inlet. I would not like to see an invaluable resource go to waste, would not like to see the law actively disregarded, and most importantly would not like to see the families who depend on the income from Cook Inlet salmon to go through extremely difficult times. Please take my comment into consideration and do not take the state proposed alternative 4 into consideration. Thank you, Dominik

Christopher Monfor
M&M Fish Company
11/20/2020 10:09 PM AKST

As a third generation east side setnetter I respectfully would recommend the following. •
APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVENSON ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSON ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES. Our traditions, Alaskan Native Culture and economic contributions are important and justified to continue to make significant impact in the well being of the local community and the spirit of Alaska Respectfully, Christopher Monfor

Calvin Rodgers
11/20/2020 10:05 PM AKST

My name is Calvin Rodgers. I am a 4th Generation Commercial Fisherman in Seward Beach in Kenai. My Great Grandfather first started fishing in the early 1960's. I fish along with my grandfather who is 2nd generation and my aunt is 3rd generation.

Cyle Charbonneau
11/20/2020 10:02 PM AKST

APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVENSON ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENSON ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES.In addition, We want the NPFMC and NMFS to delegate authority to the State of AK to manage the Cook Inlet salmon fishery, but Alternative 2 as written, fails to address the entire fishery as both the Ninth Circuit Court and the District Court have ordered. Under Alternative 2, escapement goals for all stocks of salmon, management plans and in-season management practices must meet the requirements of the Magnuson-Stevens Act (MSA) and the Ten National Standards. Thank you for your time. Again, please **APPROVE ALTERNATIVE 2** and **REJECT ALTERNATIVE 4**Furthermore I have fished here my whole entire life 20+ years as my family has for generations. I cannot see how you can close all these peoples way of making a living. This needs to be stopped. Cyle Charbonneau

Laurie Crookston
Setnet fishing family
11/20/2020 09:25 PM AKST

• APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES. Further we are a four generation fishing family. This fishery is vital to thousands of people. The tactics surrounding Alternative 4 show total lack of leadership and integrity and honesty. Approve of MSA compliance with the national standards with an amended Alternative 2.

Gavin Hudkins
11/20/2020 09:05 PM AKST

My name is Gavin Hudkins and I am a 4th Generation commercial fisherman. I grew up fishing on my Grandfather's beach site and now that he has passed, we have maintained his legacy by continuing to harvest salmon with my parents and siblings on Salamatof Beach, Cook Inlet. Currently, I am writing my college application essays and there isn't a better topic to share than what it is like to grow up working hard and feeling proud that we can harvest salmon to feed the world. I am writing today to share that I hope that you take into consideration the above and know that I would urge you to:

• APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES. In addition, We want the NPFMC and NMFS to delegate authority to the State of AK to manage the Cook Inlet salmon fishery, but Alternative 2 as written, fails to address the entire fishery as both the Ninth Circuit Court and the District Court have ordered. Under Alternative 2, escapement goals for all stocks of salmon, management plans and in-season management practices must meet the requirements of the Magnuson-Stevens Act (MSA) and the Ten National Standards. Please APPROVE ALTERNATIVE 2 and REJECT ALTERNATIVE 4. Sincerely, Gavin Hudkins, 4th Generation Fisherman

Sarah Hudkins (Frostad)
11/20/2020 08:54 PM AKST

To whom it may concern: My name is Sarah Hudkins (Frostad) and I am a 3rd Generation commercial fisherman on Salamatof Beach, Cook Inlet, Kenai. I currently fish alongside my children and grandchildren on the same land and water that my Grandfather began fishing in the 1920's. I am writing to you today to state that along with my family, we

• APPROVE ALTERNATIVE 2 WITH AMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILITY OF THE LOCAL COMMUNITIES AND ECONOMIES. In addition, We want the NPFMC and NMFS to delegate authority to the State of AK to manage the Cook Inlet salmon fishery, but Alternative 2 as written, fails to address the entire fishery as both the Ninth Circuit Court and the District Court have

ordered. Under Alternative 2, escapement goals for all stocks of salmon, management plans and in-season management practices must meet the requirements of the Magnuson-Stevens Act (MSA) and the Ten National Standards. Thank you for your time. Again, please APPROVE ALTERNATIVE 2 and REJECT ALTERNATIVE 4 Sincerely, Sarah Hudkins, 3rd Generation Fisherman and Kenai Peninsula Fisherman's Association Director

Michael Crookston

11/20/2020 08:36 PM AKST

I have grown up in Cook Inlet as a proud 3rd generation setnetter. I value what I have gained from this work with my family more than almost anything. Political extremism is destroying our way of life and our country. This is an example of an extreme policy that must be rejected by our leaders. Please: • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVENS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Jake Newton

11/20/2020 08:18 PM AKST

Please consider proposal 2 and disregard proposal 4. I have been fishing in cook inlet my entire life . I started you going with my dad at age 4 in 1984 and ive been a paid crewmember abd permit holder for the last 30 years and proposal 4 will put my family and me out of business. We are struggling as it is .once again please consider proposal 2

Nathaniel Patsos

11/20/2020 07:46 PM AKST

Commercial fisherman have sustainably and responsibly fished the waters of Cook Inlet for decades. There is no reason to take away this important industry from the region. The only acceptable course of action is the following: APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVENS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Nicholas Hancey

11/20/2020 06:50 PM AKST

This Fishery has been a huge part of my life and I hope will remain to be here for my sons. Please don't close this fishery. The fishermen deserve better than to be under cut by a rushed action. This is an important part of our lives. • APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVENS ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVENS ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES.

Eric Nyce

KPFA

11/20/2020 06:07 PM AKST

• APPROVE ALTERNATIVE 2 WITH AMMENDMENTS TO COMPLY WITH MAGNUSON-STEVEN'S ACT NATIONAL STANDARDS AS REQUIRED BY LAW. • REJECT ALTERNATIVE 4 ENTIRELY. THIS WAS UNETHICALLY LATE SUBMITTED, IS UNVETTED, AND WOULD COLLAPSE THE LONGSTANDING VIABLE COOK INLET SALMON FISHERY IN DIRECT OPPOSITION TO THE REQUIREMENTS OF THE MAGNUSON-STEVEN'S ACT, COMMON SENSE, AND THE BENEFIT AND SUSTAINABILTY OF THE LOCAL COMMUNITIES AND ECONOMIES. The fact that alternative 4 was submitted by the state shows the complete disregard the Dunleavy Administration and the State of Alaska has for small businesses and commercial fishing families throughout the state of Alaska. I implore the council to unanimously reject this outrageous proposal to bankrupt hundreds of business trying to survive in these challenging economic conditions.

Mark Mahan

11/20/2020 01:38 PM AKST

62 years old, Homer, Cook Inlet drift fisherman for 38 seasons, I also have a son, 36, who is a permit holder, and two daughters, one 31, and another 27 years old, both permit holders. The younger one has worked on the boat since 12 years old, and all put themselves thru college and still return every year to fish. I am in favor of Alternative 2 with oversight of F & G. Alternative 4 should never have been an option, I really don't understand how that could ever have been proposed.

Hilary Matthews

11/20/2020 01:08 PM AKST

My late husband, Theo Matthews, was a Cook Inlet commercial fisherman for over 30 years. During that time, he worked tirelessly, together with many others, to make sure that this fishery, such an important part of the local economy for over 100 years, remained and would continue as a viable and sustainable fishery for commercial fishers and their families. The suggestion in Alternative 4 – an ill-thought out and last-minute proposal – that the EEZ in Cook Inlet should be closed to commercial fishing will have him turning in his grave! In one fell swoop it would destroy the entire commercial fishing industry and with it the livelihoods of hundreds of families and many more who earn a living through all the related businesses throughout the entire Cook Inlet region. It is hard to imagine how anybody in their right mind could even come up with such a plan unless their sole purpose was to destroy this fishery. Alternative 4 must be rejected. The best Alternative, albeit with some important amendments is Alternative 2, which must specify that it applies to the entire Cook Inlet fishery and that escapement goals and management practices are in compliance with the Magnuson-Stevens Act.

Nina Crookston

The Wild Salmon Ranch

11/20/2020 12:56 PM AKST

Hello, I respectfully APPROVE ALTERNATIVE 2 WITH AMMENDMENT TO COMPLY WITH MSA NATIONAL STANDARDS • I REJECT ALTERNATIVE 4 ENTIRELY. I have always felt that goverment leaders should place feeding nation above sports and recreation. This is a sustainable wild resource and we need to take care of it. following the MSA is the right way to take care of this resource, dismantling this fishery is NOT the way to take care of it. IF you are going to close the cook inlet to federal water then we as fisherman need significant compensation. No more last minute dirt tricks, just follow the law. I depend on these water for feeding my family, it is not sports and rec to me.

Alan Crookston
Wild Salmon Ranch
11/20/2020 12:52 PM AKST

To whom it may concern, I APPROVE ALTERNATIVE 2 WITH AMMENDMENT TO COMPLY WITH MSA NATIONAL STANDARDS • I REJECT ALTERNATIVE 4 ENTIRELY. My family and I have fished these water for 4 generations. Every summer I hire about 10 local people to help me fish this site, and it is a great summer job for them. For many of the workers this job pays for thier college. It has been so for over 55 years just on this site. Furthermore, I spend tens of thousands of dollars on welder, mechanics, drivers and freight providers to support my business. It is time that Alaska managed this fishery as it is supposed to manage it under the Magnuson-Stevens Act and comply with the 10 standards therein, it time that the qualifications to be on the BOF come from people with actual industry experience, it is time that the commissioner and governor are watched for ethical and legal violation, it is time to give local area biologist the ability to manage their areas of specialty and not aloof bureaucratic out of Juneau. We just want a fair chance, no last minute - end of meeting dirty tricks. Paly fair, be honest, do the right thing and protect this sustainable resource.

Walter Page
F/V Peregrine, Self Employed Commercial Fisherman
11/20/2020 11:13 AM AKST

My name is Walter Page and I have been a self-employed Commercial Fisherman for 60 years in the Cook Inlet Salmon Fishery. I have watched this fishery go from a respectable livelihood to afford the necessities of life, into the need to beg for Government Assistance, due to the failure of the State of Alaska, ADF&G and the BOF. Now the State of Alaska wants to further cripple the commercial fishermen of Cook inlet by removing more area in which we have historically made our living, by removing the EEZ area, Alternate #4. Alt #4 should not even be an option brought before this Board meeting, whereas it would effectively close the entire fishery which supports the communities of entire Kenai Peninsula. This decision would be ludicrous, and no where near the binding decision that the Ninth Circuit Court has intended and ordered. The State of AK would effectively be mandating 1000's of business's to simply close their doors and beg for MORE welfare! The MSA has proven to be the Federal Law which is provided to the livelihoods of Commercial Fishermen throughout the entire nation. The State of AK, ADF&G, BOF cannot simply sweep the EEZ under the rug, and suggest that the problem is resolved. To the contrary; The State of AK, ADF&G, and the BOF - ARE THE PROBLEM! Federal oversight is imperative to save this fishery. Alternative #2 provides for the livelihoods of Cook Inlet Fishermen and follows the Ninth Circuit Ruling, as intended and therefore ORDERED! Thank you for the opportunity to comment on this dire subject. Walter Page

Teague Vanek
Fisherman
11/19/2020 11:14 AM AKST

Please reject Alternative 4 for the Cook Inlet salmon FMP. It is an obvious and blatant attempt to destroy an industry (my industry) that has sustained families for generations (4 generations in my family). Alternative 2 is the better choice, allowing for State management with federal oversight requiring compliance with National Standards. Any salmon management plan absolutely must incorporate escapement goals which follow MSY principles. Also, management actions need to allow for achieving escapement goals. These have become the central issues with unchecked state management and our Cook Inlet salmon fisheries have become greatly reduced as a result. A review process needs to be implemented which can scrutinize management goals and actions and resulting harvest levels with the goal of maximizing long-term utility of Cook Inlet salmon resources.

Gary Hollier
Set Netter Cook Inlet
11/19/2020 09:34 AM AKST

I own and operate a large family set net operation in Cook Inlet, just south of the Kenai River. I am opposed to option 4 and support a modified version of option 2 in the upcoming decision on an FMP in the EEZ of Cook Inlet, for two important reasons. Cook Inlet is down to two major processors, if the EEZ area is closed or modified there is a good chance NO processors will be able to be economically viable in Cook Inlet. Without processors the commercial fishery in Cook Inlet will be non-existent. As a set netter we have faced severe restrictions to our fishery with time and gear reductions due to not being able to meet King Salmon goals to the Kenai River. As a result in River sockeye goals have been exceeded consistently to the Kenai and Kasilof Rivers. One of the mandates in the MSA is MSY. MSY management is not occurring in the Kenai and Kasilof Rivers. At the 2020 Upper Cook Inlet BOF meeting the upper end of the BEG to the Kasilof River was lowered to 340,000. In the 2020 season 545,654 sockeye were counted in the Kasilof. ADFG stated at the 2020 BOF meeting that escapements over 500,000 would not replace themselves. Hardly MSY management! In 2020 the upper end in river sockeye goal was 1.3 million. The sonar count was 1.81 million. The SEG and in river goals were grossly exceeded. Escapements like this have a spawner return ratio of 1.2. The State wide ratio for other river systems is more than 4 returners per spawner. Once again hardly MSY management. Please choose option 2 for the benefit of the entire commercial fishery in Cook Inlet Thank you, Gary Hollier I

Nelson Hautanen
11/18/2020 06:21 PM AKST

We are lifelong Alaskan CI drift fishermen with longtime family fishing operations and a combined involvement of over 400 years. We are strongly opposed to Alternative 4 and in support of a modified version of Alternative 2. Sincerely, Nelson Hautanen and family Co-signers and Families: Tony Lindow, Tom Flynn, Jeff Lindow, David Flynn, John Lindow, Sid Redden, Gale Flynn

Larry Conklin
11/17/2020 01:11 PM AKST

I'm a third generation drift fisherman in Cook Inlet, we have been fishing Cook Inlet since before Alaska was a state. In that time we saw the state of Alaska save this fishery from the fish traps, the Federal government save this fishery from the foreign high seas fleet with the 200 mile EEZ and, sadly, seen the state of Alaska destroy this fishery through management for political favor. We are here asking to be managed under MSA, the law of the land, and to follow the science. A BOF commissioner said in an open hearing that "We don't care about the science." We are here asking for relief from management that clearly places political pressure over science, over the law. 2020 was a complete failure. The escapement over the bloated escapement goals exceeded the entire commercial harvest. The fleet is on the verge of collapse, the boats and the fisherman are getting older and we have been operating at a loss. Alternative 3, as the draft says: "is expected to result in both reductions in harvest and substantial additional costs to State and Federal management agencies, as well as fishery participants" and eventually put the fleet out of business. Alternative 4 would accomplish the same thing, just much quicker, and without NMFS having to share in the pain. That leaves us with alternative 2 as the only viable choice. Draft Section 1.6.8. Process for Federal Oversight and Review, is critical for success. From the draft "FMP Amendment 3 Effectively removes Council and NMFS from routine management but expressly maintained Federal participation, oversight, and final authority." There is a long list of ways the state is not following the standards set out in MSA. We need the feds to hold them accountable to follow the law as laid out in MSA. Our efforts to do so has met with decades of setbacks and failure. We have been pulled back from the brink before, will this body step up and do so again. Follow the science, follow the intent of the court, follow Alternative 2.

Chris Kempf

11/17/2020 12:30 PM AKST

My name is Chris Kempf. I've drifted in Cook Inlet for 43 years, and have seen our fishery being slowly suffocated. Overescapement of our rivers, year after year, is hurting our future runs. Why not manage for maximum sustained yield? This would mean more fish for all user groups. It seems like a win-win for everyone. Alternative # 4 would be the final nail in our coffin. It will be a sad day when the canneries are mothballed and countless boats become derelicts. Thank You, Chris Kempf, Kenai, Alaska

Kyle Lints

11/16/2020 10:28 PM AKST

I support alternative two. Cook inlet drift fisherman have suffered under poor management for long enough. All other options could lead to the demise of a fishery that has long supported local family's and businesses on the kenai peninsula and beyond. Option two needs some work, but could lead to a successful revitalization of the fishery.

David Wade

United Cook Inlet Drift Association

11/16/2020 02:59 PM AKST

The question is simply this : What is RIGHT and what is WRONG?.... As it relates to Alternative #4, shutting down the eez area to commercial harvesting of a renewable resource is contradictory to the spirit of what the court has ordered as well as the spirit in which the NMFS and NPFMC operate. This lack of science based management by the state that has ruined the commercial fishery in Cook Inlet is exactly the reason we have gotten to this place we are today. We are fighting for our lives here and have been for years, while state management has bungled along in it's obligations. This committee only has to look at the number of years of over escapement and poor returns to see the truth. Taking this action (Alt. #4) would not reduce the need for proper management, it would only exacerbate the obvious problem of inadequate state management. The consequences of which would be the elimination of thousands and thousands of jobs. Sweeping a problem under the rug does not eliminate the problem. This is exactly what the state is trying to do by adding Alt. #4 at the end of the process. This action would be WRONG. As it relates to an amended version of Alternative #2, this would be in the spirit of the court order, would actually force the state into a proper type of management plan, and would help save a once viable commercial fishery from extinction. This would be the RIGHT thing to do. Thousands and thousands of people have been engaged in this fight for survival for many, many years, while the state looked the other way, loaded up the board of fisheries with sport interests and attempted to sacrifice a commercial fishery for votes, campaign promises and backroom deals. This is the sad reality of what Cook Inlet has become. Nothing more than a political tool. It's sickening at it's core. We finally have a way to stop this insanity and rebuild a once mighty fishery back to what it can be. This committee has the chance to do that. Will you help us to do the RIGHT thing? We implore you to reject Alternative #4 and to accept Alternative #2 with some helpful amendments. Thank you for your time and consideration of my letter. David Wade F/V Shoshone

Omar John Gucer

11/16/2020 11:46 AM AKST

I want to thank the council for finally writing an Fmp for the Cook Inlet Drift Fishery. We drift fishermen have been waiting a long time for management that conforms to the MSA - specifically a plan with escapement goals that result n maximum sustained yield for all Cook Inlet Salmon Stocks. Option 2, delegating management to the state, is clearly the best option. We know The state has the ability to manage our stocks for MSY, because they manage for MSY in all other (ie non Cook Inlet) salmon fishing areas in the state. Option 4 appears to be a last ditch attempt by the council to evade their responsibility to write an FMP. Closing a fishery is not the same as managing a fishery. This option

would be economically devastating for the Kenai Peninsula communities whose residents depend on this fishery.

Andrew A Umlauf

11/15/2020 04:17 PM AKST

I fully support change in the management of the Cook Inlet drift fishery. Too long has the fleet been boxed in, more and more with each cycle of the BOF. Too long have the Kenai and Kasilof rivers been over escaped simply because fishermen aren't allowed to fish. Too long have local processors left or declared bankruptcy. No other salmon fishery in the state is managed in this manner. It's time for a change, with new fishing practices and escapement goals that follow long established Federal law (MSA). Alternative 2 seems the best option to do so, as long as fishing practices and escapement goals meet the requirements set forth in the MSA and the ten national standards. Alternative 4 is a radical and destructive choice that would put commercial fishing out of business in Cook Inlet. I am confused as to why the state would even pursue this as an option. Without the EEZ open to fishing, not enough fish can be harvested to sustain fishers or processors. Fishers would be crowded together in state waters competing for few fish. Millions of fish could not be harvested, leading to extreme over escapement, waste in local rivers and likely poor salmon returns in future years. This proposal would impact local communities and families negatively throughout the peninsula, even those that are not commercial fishers. National standard 8 requires that management provide for the sustained participation of local communities. Alternative 4 would be in direct opposition of this.

Daniel R Hakkinen

11/15/2020 04:00 PM AKST

My name is Dan Hakkinen. I've been a resident of the Kenai-Soldotna area for 68 years. I've spent 57 of those years in the commercial drift fishing industry starting as a deckhand at 13 and owning my own boat and permit for the past 42 years. I strongly urge the Council to accept Alternative #2 modified to comply with MSA. Alternative #4 should not even be considered. All this alternative does is destroy a viable fishery. Who could possibly be for that? Let's manage for "MAXIMUM SUSTAINED YIELD!" It worked here before, it will work again. Who would not want 6-9 million fish returns again? Thank you, Daniel R. Hakkinen

Catherine Cassidy

11/13/2020 03:00 PM AKST

I support the concept of Alternative 2, but not as it currently is written because it needs to apply to the entire fishery. It also requires a provision that the State of Alaska make the changes necessary to bring its escapement goals and salmon management practices into compliance with MSA National Standards 1, 2, 3 and 4. Alternative 4 is not a viable alternative whatsoever. State of Alaska representatives introduced it at the very last moment at the October Council meeting with the clear intention of eliminating the Upper Cook Inlet commercial fisheries. Closing the EEZ to commercial fishing will reduce the catch levels of salmon to the point of making the industry unsustainable in Cook Inlet. It is in direct violation of the MSA and National Standard 8. A number of seafood processors have already left Cook Inlet as the mis-management of the fishery by the ADFG has intentionally reduced commercial harvests in recent years. Losing the significant drift gillnet salmon catch from the EEZ will push the few remaining companies out of Cook Inlet. This would accomplish the state's goal of eliminating Upper Cook Inlet commercial fishing. It would also shut down all the other fisheries around Cook Inlet that rely on the seafood processing companies to process their catches. It would shut down peripheral businesses that depend on fisheries here. It would eliminate already-scarce sources of income for residents in our coastal communities. It would nullify many millions of dollars of capital investments in our communities. In 2020 there are 1,062 Cook Inlet salmon permits owned by residents in the coastal communities of Nanwalek, Port Graham, Seldovia, Halibut Cove, Kachemak Selo,

Razdolna, Voznesenka, Fritz Creek, Homer, Anchor Point, Nikolaevsk, Ninilchik, Clam Gulch, Kasilof, Soldotna, Sterling, Kenai, Nikiski and Tyonek. A reasonable estimate of the average capital investment in these fishing businesses would be \$150,000. All together their value is around \$160 million. There are another 267 permits in Anchorage and the Mat-Su Borough. That's just salmon and just permit holders; no processing facilities, tenders, suppliers or support businesses. Commercial salmon fishing has been sustaining the communities of Cook Inlet for over one hundred years. National Standard 8 specifically says that conservation and management measures shall take into account the importance of fishery resources to fishing communities in order to provide for their sustained participation and minimization of adverse economic impacts. Alternative 4 would perpetrate a terrible injustice to our communities.
Catherine Cassidy Kasilof, AK

Brian Harrison

11/04/2020 09:12 AM AKST

Option 4 as proposed would be the death of the drift fishery! Without access to the entire Inlet it will be impossible for the fleet to provide enough product (fish) to the processors (buyers) to ensure the survival of the processing sector. It will also mean millions of salmon going unharvested as they over escape the rivers. The drift fleets ability to access fish from the Anchor Point line north and in the entire area will provide for an orderly, sustainable continuation of the commercial fishery. To limit us to the corridor only, all season long will result is a chaotic fishery that will consistently under harvest available surplus salmon. It will be virtually impossible to sustain a processing presence on so few fish. The exclusion of the western part of the lower Inlet will result in the loss of deliveries to the City of Homer. This will result in loss of revenue to the City of Homer and harbor. The Corridor is too long of a run for boats to come from with any regularity. Such action as proposed will be the demise of the Cook Inlet drift fleet, and a severe economic hit to those businesses that support it. As I understand it the intent of the MSA is to ensure survival of local small communities and fisheries. Your proposed actions will have the complete opposite effect and if enacted, result in the failure of the commercial drift fishery entirely!