

Summary Report on Cook Inlet Salmon Stakeholder Responses to the Council's Call for Proposals

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Introduction

In April 2017, the Council announced its intent to amend the Fishery Management Plan for the Salmon Fisheries in the EEZ Off Alaska (Salmon FMP) to address traditional net fishing areas in the EEZ that are currently excluded from the management unit. At its October 2017 meeting, the Council limited the scope of the amendment to the traditional net fishing area that is located in the EEZ adjacent to Cook Inlet and adopted a purpose and need for this proposed action to amend the Salmon FMP.

Preliminary Purpose and Need

The Council intends to amend the Salmon FMP to manage the traditional net fishing area that occurs in Federal waters of Cook Inlet. Federal management in an FMP must meet the required provisions for an FMP in section 303(a) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and related Magnuson-Stevens Act provisions. This proposed action is necessary to bring the Salmon FMP into compliance with the Magnuson-Stevens Act consistent with the recent Ninth Circuit ruling and the Judgement of the District Court in UCIDA et al., v. NMFS.

At the April and October Council meetings, the Council also heard public testimony from stakeholders requesting that the Council form a committee to help develop the options for the Salmon FMP for Cook Inlet. At the October 2017 meeting, the Council decided to form a Salmon Committee to assist in the development of the measures necessary to satisfy Section 303(a) of the Magnuson-Stevens Act and related Magnuson-Stevens Act provisions. On October 5, 2017, the Council conducted a Salmon FMP outreach meeting to hear from the interested stakeholders on the appropriate scope of a committee that would provide input into the development of a Salmon FMP amendment. The Council was interested in hearing from stakeholders on —

- What specific issues should the workgroup consider to be most effective?
- What is the appropriate composition of the stakeholder workgroup?
- How often should the workgroup meet?
- When and how would the workgroup provide its recommendations to the Council?

On October 17, 2017, the Council initiated solicitation of written proposals from the public to identify conservation and management measures that the committee could assist in developing and evaluating. The Council communicated its call for public proposals through its website and newsletter and included a February 1, 2018 deadline for submission of proposals. The call for proposals and deadline were also announced by the Alaska Board of Fisheries through their email distribution list.

At the April 2018 meeting, the Council will review these proposals to determine the composition and scope of work for the Salmon Committee.

For this Summary Report, Council and Agency staff reviewed the stakeholder comments and summarized the range of issues and concerns identified by the public as being important for the development of options to amend the Salmon FMP. This Summary Report also includes an initial draft scope of work and potential organizing principles for the Salmon Committee and the current suite of proposed management measures for amending the Salmon FMP.

Members of the public submitted 33 responses. These included 25 nominations to the Salmon Committee as well as a broad range of comments and perspectives on management of salmon in Cook Inlet. The submissions that were interpreted (very inclusively) by staff as containing comments/proposals are attached. The remaining nominations for the committee, which was not the intent of the call for public proposals, are currently being held until the Council formally announces a call for nominations. This document does, however, characterize the range of stakeholder representation reflected in the current set of nominations to provide information to the Council on the potential composition of the committee.

Representation Reflected in Stakeholder Comments

Of the twenty responses to the call for proposals that contained comments, seven were provided by individuals representing themselves (one was withdrawn), seven by individuals representing both the United Cook Inlet Drift Association and Cook Inlet Fishermen's Fund (UCIDA/CIFF), one by an individual representing the Cook Inlet Aquaculture Association, and five separate comment letters from entities: UCIDA/CIFF (2 letters), the Matanuska-Susitna Borough Fish and Wildlife Commission, the Community of Nikolaevsk, and the Kenai River Sportfishing Association (KRSA).

Summary of Stakeholder Comments

The following list was created to simplify review of the topics addressed through the public comments/proposals. Often, several submissions converged on a particular topic. The list is broken into three parts: (1) recommended actions to be taken during development of the amendment, (2) recommended outcomes to be affected through the amendment, and (3) perspectives on current management of salmon in Cook Inlet. **Within those groupings, the comments are further arranged by subject matter, and these subject matter headings may be useful in developing a scope of work for the Salmon Committee.**

For each part of the list, topics are arranged in descending order of popularity as reflected in the number of responses (number of responses indicated parenthetically). Because of its simplified nature, this list cannot capture subtle nuances in the responses that can only be appreciated by reading each letter.

Recommended actions as part of development of the FMP amendment

Overall management structure

- (12) Ensure consistency with MSA (National Standards) and other Federal laws
- (1) Model NPFMC Salmon FMP after Pacific Fishery Management Council Salmon FMP
- (1) Develop a division of Federal and State of Alaska management roles as in the FMP For Bering Sea/Aleutian Islands King and Tanner Crabs
- (1) Address observer coverage
- (1) Develop a progressive harvest structure in Cook Inlet EEZ based on projected sockeye runs in the Kenai River

Harvest specifications

- (3) Evaluate escapement-based management as a proxy for Annual Catch Limits
- (1) Reconcile Federal Optimum Yield with State Optimal Escapement Goals and Optimal Sustainable Yield

Committee representation

- (2) Ensure diverse representation on the Committee
- (2) Ensure representation of experienced, local stakeholders on the Committee
- (1) Ensure representation of young fishermen on Committee

Biological impacts analysis

- (2) Consider interactions with invasive species
- (2) Consider the effects of the Cook Inlet EEZ fishery on "stocks of concern" in Northern District and on Kodiak and Alaska Peninsula stocks
- (1) Evaluate EEZ salmon fishery impacts on Cook Inlet beluga whales
- (1) Consider impacts of EEZ fishery versus moving harvest of salmon nearer to spawning rivers

Socio-economic impacts analysis

- (1) Address social impacts, community impacts, community sustainability
- (1) Address banking and financial issues - access to capital, equity funding
- (1) Address economic issues and allocations - personal, community, borough, state
- (1) Address fishing sectors and allocation, including commercial, recreational & subsistence

Recommended outcomes

Management structure/Agency roles

- (3) Annual monitoring of State salmon management including creating a Salmon Plan Team
- (1) Delegate as much management as possible to the State (endorsement of Alt 2)

Competing Interests

- (1) Limit salmon harvest in Cook Inlet EEZ to sockeye salmon
- (1) Progressive harvest structure in Cook Inlet EEZ based on projected sockeye runs in the Kenai River
- (1) Stop all commercial fishing

Conservation

- (2) Minimizing fish waste
- (2) Sustainable salmon populations throughout range, including all of Cook Inlet drainage

- (2) In-season management that prevents under/over escapement, stabilizes harvest, allows for supplemental production
- (2) Harvest/management of "unmanaged" coho/pink/chum salmon stocks in Cook Inlet
- (1) Rebuilding timeline for "stocks of concern"

Stakeholder perspectives

Management issues

- (6) Negative characterizations of current management of salmon stocks
- (3) Access to resource is currently biased toward certain user groups
- (2) Management unit should extend from outer EEZ boundary to river headwaters
- (1) Negative characterization of commercial fishing including salmon fishery in Cook Inlet
- (1) Cannot manage Susitna salmon based on Kenai escapement
- (1) FMP amendment can/should be implemented quickly
- (1) UCIDA/CIFF have developed an updated Essential Fish Habitat impact analysis and an amended FMP that is 70-80% done

Conservation issues

- (7) Over-escapement / under-harvest is limiting salmon productivity and leading to waste
- (1) Beluga whales will return to Cook Inlet if salmon stocks increase
- (1) Invasive species impacts to spawning habitat are being ignored
- (1) Salmon movement and genetics need to be better understood

Socio-economic issues

- (1) The closing of two canneries in Ninilchik resulted in many jobs lost
- (1) Provided a historical background of Nikolaevsk and other Russian Old Believer Communities

Representation Reflected in Salmon Committee Nominations

Table 1 provides a summary of the nominations that were received in response to the call for proposals. Of the 25 nominations received for appointment to the Salmon Committee, six represented UCIDA/CIFF, seven represented themselves, two represented UCIDA only, three represented CIFF only, and the remaining seven separately represented the Ninilchik Native Association, Inc., the Cook Inlet Aquaculture Association, the Kenai River Sportfishing Association, the Matanuska-Susitna Borough Fish and Wildlife Commission, the Cook Inlet Revitalization Association, InletKeeper, and the Kenai Watershed Forum.

Alaska communities represented among the nominations included Anchorage, Clam Gulch, Homer, Kasilof, the Matanuska-Susitna Borough, Nikiski, Ninilchik, and Soldotna. Three nominations did not specify a community.

Sectors represented among the nominations included commercial driftnet, commercial setnet, commercial mixed gear, recreational, subsistence, aquaculture, government, and environmental non-governmental organization (NGO).

Table 1. Representation reflected in nominations that the Council received in response to the call for proposals.

Name	Organization	Sector	Gear	Community	Provided comments
Anderson, Dan*	UCIDA	comm	driftnet	Homer	Y
Beaudoin, Jeff	CIFF	comm	setnet	unk	
Casseri, Mark	self	comm	driftnet	Kasilof	
Delaney, Kevin	KRSA	rec	rec	unk	Y
Ducker, Mark	CIFF	comm	setnet	Kasilof	
Encelewski, Richard "Greg"	Ninilchik Native Assoc, Inc.	subsistence	mixed	Ninilchik	
Fandrei, Gary	Cook Inlet Aquaculture Assoc.	aquaculture	na	Kenai	Y
Fox, Jeff*	UCIDA/CIFF	comm	driftnet	Soldotna	Y
Huebsch, Erik*	UCIDA/CIFF	comm	driftnet	Kasilof	Y
Humbyrd, Wes	UCIDA/CIFF	comm	driftnet	Homer	Y
Keene, Brentley	self	comm/rec	mixed	Homer	
Martin, David*	UCIDA/CIFF	comm	driftnet	Clam Gulch	Y
Martishev, Joe	self	comm	unk	unk	Y
Mat-Su Borough FWC	Mat-Su Borough FWC	government	na	Mat-Su Borough	Y
Maw, Roland*	UCIDA/CIFF	comm	driftnet	Kasilof	Y
McCombs, John*	UCIDA/CIFF	comm	mixed	Anchorage	Y
McGahan, Richard	self	comm	mixed	Nikiski	
Shadura, Paul	Cook Inlet Revitalization Assoc.	comm	setnet	Kenai	Y
Shavelson, Bob	InletKeeper	NGO	na	Homer	
Sinclair, Jack	Kenai Watershed Forum	NGO	na	Soldotna	
Sutherland, Dino*	UCIDA	comm	driftnet	unk	
Vanek, Steve	self	comm	driftnet	Ninilchik	Y
Vanek, Teague*	UCIDA/CIFF	comm	driftnet	Ninilchik	Y
Yakunin, Sergi*	self	comm	driftnet	Nikolaevsk	
Yakunin, Vasily*	self	comm	driftnet	Nikolaevsk	

* Also nominated by Community of Nikolaevsk

Establishing the Cook Inlet Salmon Committee

The Council has committed to the creation of a Salmon Committee. The following is provided for Council consideration in developing a scope of work for the Committee.

Draft Initial Scope of Work

In order to contribute to the development of the Salmon FMP amendment, the Cook Inlet Salmon Committee will provide recommendations to the Council on the following issues that were identified through collected stakeholder comments:

1. Salmon fishery management measures that address MSA 303(a) requirements such as catch and bycatch monitoring measures (see Table 2)
2. A description of the commercial, recreational, and charter fishing sectors which participate in the fishery
3. Social, economic, and community impacts of management measures
4. Competing interests in this shared resource
5. Review and provide input to the Council on analytical documents prepared by Council and Agency staff

The Council will determine the sequencing of issues and any addition to the issues to come before the Committee.

Potential Cook Inlet Salmon Committee Organizing Principles

In addition to developing a scope of work for the Salmon Committee, the Council may wish to establish Committee guidelines and define members' roles and responsibilities, in order to promote efficiency in its operations and minimize confusion for Committee members and other participants at future Committee meetings. The Council has defined a mission statement or statement of purpose for each of its existing committees. Standing committees, such as the Enforcement Committee and Pacific Northwest Crab Industry Advisory Committee benefit from formal Terms of Reference. Because the Salmon Committee will include stakeholders who have not historically participated in the Council process, a clear definition of the Committee's operations may be especially helpful. A strawman of potential organizing principles is provided below for Council consideration.

1. **Purpose**. The Council establishes a Cook Inlet Salmon Committee to consult on matters related to the completion of an amendment to the Salmon FMP that would add the traditional net fishing area in the EEZ within Cook Inlet to the Salmon FMP. The Committee's primary function will be to (1) review and provide comments on specific, Council-identified issues; (2) develop options for fishery management measures for specific, Council-identified management needs, and (3) provide perspectives on potential social and economic impacts of proposed fishery management measures.
2. **Membership**. Committee members serve at the will of the Council and will be appointed by the Council Chair to include, but not be limited to, Cook Inlet salmon fishery stakeholders, including plaintiffs in UCIDA v. NMFS. The Committee will be Chaired by a member of the Council, appointed by the Council Chair. Members will be required to review issues and provide productive comment to the Council.
3. **Organization**. The Committee will be directed by the Committee Chair.

- a. **Rules of order.** In general, rules of order will be informally based on Robert's Rules of Order, with the expectation that Committee discussions will be respectful and collaborative. Committee advice will be reached by consensus, when possible. Committee minutes will reflect the range of perspectives of all members.
- b. **Meetings.** Committee meetings will be held as needed, at locations specified by the Council or Committee Chair. Meetings will be open to the public. Interested persons are permitted to present written comments and public testimony may be taken, as determined by the Committee Chair. Meetings may be broadcast by listen-only webcast to the public, depending the availability of those services and level of interest by the public. Note that the public always has the opportunity to provide comments to the Council during public testimony.
- c. **Development of Agenda.** A draft agenda will be prepared in advance of each meeting by Council staff in consultation with the Committee Chair. The Committee will be assigned issues for consideration on its agenda by (1) identification of future agenda items at the current Committee meeting, subject to approval by the Council; (2) identification and assignment of issues by the Council as identified during the course of a Council meeting; (3) identification of critical, time-sensitive issues between Committee/Council meetings from Council staff, agency staff, or Committee members and vetted through the Committee Chair.
- d. **Meeting Record and Distribution.** A summary report of each meeting will be prepared by Council staff and the Committee Chair who will maintain final approval of the minutes. The Committee report will be provided to the Council under the relevant agenda item.

Call for Nominations

The Council office has already received 25 nominations for the Cook Inlet Salmon Committee, however, there has not been a formal call for nominations. The Council may wish to initiate a formal call at the April meeting through the newsletter, website, and Board of Fisheries email distribution list. If the Council chooses to initiate a call for nominations, the announcement should include a deadline and also make it clear that nominations already sent in in response to the call for proposals will be included in the selection pool.

Committee Meeting Schedule

If the Council initiates a call for nominations at its April meeting, the Council could form a Committee in June, and the first committee meeting could be held in the Fall as a prelude to bringing the expanded discussion paper back before the Council in October or December.

Appendix 1 – Proposed management measures for amending the Salmon FMP

The Council is considering three alternatives:

Alternative 1: No Action

Alternative 2: Cooperative management with the State

Alternative 3: Federal management

The Council directed NMFS and Council staff to continue to work with the State of Alaska to develop options for the conservation and management measures required under 303(a) of the Magnuson-Stevens Act and related Magnuson-Stevens Act provisions. Table A-1 on the following pages, provides a summary of the measures developed to date and the potential for committee involvement in developing or reviewing the proposed measures.

The table below references sections of the expanded discussion paper presented to the Council at the October 2017 meeting and available at: <http://npfmc.legistar.com/gateway.aspx?M=F&ID=0d27144f-7153-46ba-a157-d957f0e3aad0.pdf>.

Table A-1. Magnuson-Stevens Act § 303 Contents of Fishery Management Plans and considerations and options to include required provisions in FMP for Cook Inlet.

Summary of MSA §303 Contents of Fishery Management Plans (a) REQUIRED PROVISIONS	Potential Options under Alternative 2: Cooperative Management with the State of Alaska	Potential Options under Alternative 3: Federal Management	Potential Committee involvement and status
(1) <i>contain the conservation and management measures</i>	Section 2.4.2 contains procedures for delegating management to the State and two categories of management measures; Category 1 - Federal Category 2 - State Conservation and management measures delegated to the State are in section 2.4.3.	Conservation and management measures are developed under the options in Chapter 2.	No further development needed unless Council modifies existing Alternative.
(2) <i>contain a description of the fishery</i>	Provided in the Fishery Impact Statement. (See Chapter 4)	Not developed. Would be based on the Fishery Impact Statement in Chapter 4 but modified to reflect changes to the fishery under Federal management.	Council could request Committee comment on items necessary for inclusion under Alternative 3.
(3) <i>assess and specify the maximum sustainable yield and optimum yield</i>	MSY and OY are developed for the salmon stocks with escapement goals (See section 2.7).	MSY and OY would be based on the status determination criteria developed for Alternative 3.	Under staff development and will be presented in the next expanded discussion paper. Committee could review in the expanded discussion paper and provide recommendations to the Council.

Summary of MSA §303 Contents of Fishery Management Plans (a) REQUIRED PROVISIONS	Potential Options under Alternative 2: Cooperative Management with the State of Alaska	Potential Options under Alternative 3: Federal Management	Potential Committee involvement and status
(5) <i>specify the pertinent data which shall be submitted to the Secretary with respect to commercial, recreational, charter fishing, and fish processing in the fishery</i>	ADF&G Annual Management Report	SAFE Report prepared by the Salmon Plan Team. Council has yet to determine whether to form a Salmon Plan Team under this Alternative.	
(6) <i>consider and provide for temporary adjustments regarding access to the fishery for vessels otherwise prevented from harvesting because of weather or other ocean conditions affecting the safe conduct of the fishery</i>	Temporary adjustments are inseason management actions delegated to the State under Category 2. (See section 2.4.2)	TBD	Council could request Committee comment on items necessary for inclusion under Alternative 3.
(7) <i>describe and identify essential fish habitat</i>	Proposed Amendment 13 to the Salmon FMP		NMFS published the Notice of Availability on March 5, 2018 and is accepting public comments until May 4, 2018. (83 FR 9257)
(8) <i>assess and specify the nature and extent of scientific data which is needed for effective implementation of the plan</i>	ADF&G Annual Management Report and other ADF&G reports.	SAFE Report prepared by the Salmon Plan Team.	See (5) above. Council has yet to determine whether to form a Salmon Plan Team under Alternative 3.
(9) <i>include a fishery impact statement</i>	Provided in the Fishery Impact Statement. (See Chapter 4)	Not developed. Would be based on the Fishery Impact Statement but modified to reflect changes to the fishery under Federal management.	

Summary of MSA §303 Contents of Fishery Management Plans (a) REQUIRED PROVISIONS	Potential Options under Alternative 2: Cooperative Management with the State of Alaska	Potential Options under Alternative 3: Federal Management	Potential Committee involvement and status
(10) <i>specify objective and measurable criteria for identifying when the fishery to which the plan applies is overfished</i>	<p>Criteria are developed for three tiers of salmon stocks: <i>Tier 1: Salmon stocks with escapement goals and stock-specific catches.</i> <i>Tier 2: Salmon stocks managed as a complex.</i> <i>Tier 3: Salmon stocks with no reliable estimates of escapement.</i> (See section 2.5.2)</p> <p>Use same annual process as used in the East Area.</p>	<p>Criteria are developed for the salmon stocks with escapement goals (See section 2.5.3). Two options: Option 1 - Specify salmon status determination criteria and a harvest limit in Federal waters of Cook Inlet through the Council's review process that includes recommendations of OFL/ABC by a Salmon Plan Team, and subsequent approval by the SSC/Council. Option 2 - Prohibit salmon harvest in Federal waters of Cook Inlet.</p>	<p>Under staff development and will be presented in the next expanded discussion paper.</p> <p>Committee could review the expanded discussion paper and provide recommendations to the Council.</p>
(11) <i>establish a standardized reporting methodology to assess the amount and type of bycatch occurring in the fishery, and include conservation and management measures that, to the extent practicable (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided</i>	<p>Option 1- Full Retention of groundfish.</p> <p>Option 2- Prohibit groundfish retention.</p> <p><i>Reporting methods:</i></p> <ul style="list-style-type: none"> · VMS · Paper logbook · Electronic logbook · Electronic monitoring · Observers · eLandings 	<p>Option 1- Full Retention of groundfish.</p> <p>Option 2- Prohibit groundfish retention.</p> <p><i>Reporting methods:</i></p> <ul style="list-style-type: none"> · VMS · Paper logbook · Electronic logbook · Electronic monitoring · Observers · eLandings 	<p>Council could task Committee to develop options to meet this requirement.</p>
(12) <i>assess the type and amount of fish caught and released alive during recreational fishing</i>	Work with the ADF&G to compile this information for the FMP.		
(13) <i>include a description of the commercial, recreational, and charter fishing sectors which participate in the fishery</i>	<p>Provided in the Fishery Impact Statement. (See Chapter 4)</p>	<p>Not developed. Would be based on the Fishery Impact Statement but modified to reflect changes to the fishery under Federal management.</p>	<p>Council could request Committee comment on items necessary for inclusion under Alternative 3.</p>

Summary of MSA §303 Contents of Fishery Management Plans (a) REQUIRED PROVISIONS	Potential Options under Alternative 2: Cooperative Management with the State of Alaska	Potential Options under Alternative 3: Federal Management	Potential Committee involvement and status
<i>(14) to the extent that rebuilding plans or other conservation and management measures allocate any harvest restrictions or recovery benefits fairly and equitably among the commercial, recreational, and charter fishing sectors in the fishery</i>	If a stock or stock complex is declared overfished or if overfishing is occurring, the State of Alaska would propose rebuilding measures sufficient to comply with Magnuson-Stevens Act requirements.	TBD. This would require allocating between the EEZ harvest and state waters harvest.	
<i>(15) establish a mechanism for specifying annual catch limits in the plan and measures to ensure accountability</i>	<p>Two options for ACLs for the salmon stocks caught in the three traditional net fishing areas.</p> <p>Option 1 - the alternative approach for ACLs that is also used in the East Area.</p> <p>Option 2 - establish an ABC and ACL similar to the process used for salmon in the NMFS West Coast Region. (See section 2.6.2)</p>	<p>Two options for ACLs for the salmon stocks caught in the three traditional net fishing areas.</p> <p>Option 1 - preseason ACL estimates and postseason ACL values.</p> <p>Option 2 - preseason forecasted run size and postseason values and species-specific 3-year geometric mean proportion of the species-specific harvest occurring within Federal waters. (See section 2.6.3)</p>	<p>Under staff development and will be presented in the next expanded discussion paper.</p> <p>Committee could review in the expanded discussion paper and provide recommendations to the Council.</p>

Appendix 2 – Collected comments and recommendations from Cook Inlet salmon stakeholders during the Council’s Call for Proposals (October 17, 2017 through February 1, 2018)

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December 13, 2017

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Mr. Armstrong:

With receipt of this letter I consider my application to be submitted for the upcoming formation of the Cook Inlet Salmon Stakeholder Committee.

I will try to summarize some of my fishery management interactions along with some fishery participation history.

I think it's important to disclose that I was born in Algoma, Wisconsin in 1958, a small town on the shores of Lake Michigan, east of Green Bay, Wisconsin about 25 miles. This town, as most do along the lake shores of the world, has a river running thru it. This was home port to a group of commercial fishing boats and crews. My father was one of the proud owners and my father's twin brothers also had their own boat in this fishery. My father's oldest brother also had a fishing boat in a small port on western Lake Superior. Their father also fished between cherry and apple harvests on their small farm in northern Wisconsin.

I crewed with my father and others during high school. I attended a trade high school in Milwaukee, Wisconsin. My father was forced to relocate to Milwaukee because fish populations changed along with marketing conditions. After high school, I attended a technical college for my millwright degree. It didn't take long for me to decide that the secure employment punching a clock wasn't for me. I excused myself from that world and put my boots on deck full time.

In the late 1970's, I was named Secretary/Treasurer of the newly formed Wisconsin Commercial Fisheries Association. By the mid 1980's, it was decided to split the group into three satellite groups because geographic and target specie differences. I was named president of the Southern Wisconsin Commercial Fisheries Association shortly after its inception.

In approximately 1980, I was Governor appointed to the Lake Michigan Commercial Fisheries Board. This board was tasked to establish criteria for inactive licenses, license transfers, rule/restriction review, also to establish one of the country's first IFQ fisheries. This board had very similar duties as NPFMC has.

In 1980, my boots found themselves on my own gillnetter on Lake Michigan. By 1986, my boots found themselves on the deck of a Cook Inlet Drift boat. I crewed during the summer on this boat till I purchased said boat and permit in 1989. This had me fishing Cook Inlet during the summer months and fishing Lake Michigan all fall, winter, and spring.

In the fall of 1989, the American Fisheries Society asked me to present the Wisconsin IFQ program to the NPFMC from a fisherman's perspective, which was some of the first steps of the current Halibut and Black Cod program in place today. I also did a couple of presentations the next couple of years at Fish Expo at the request of the council and National Fisherman Magazine, if I remember correctly. I also did a several day trip to the South Atlantic Fisheries Management Council meetings revolving around south Atlantic Wreck fish. A year or so latter was requested to do a trip for off-shore Lobster on the East coast, which my schedule wouldn't allow me to attend.

Currently, I hold substantial IFQ shares in two fisheries in Lake Michigan, in one fishery I hold roughly 38% the other 15%, both of which have been severely impacted by invasive species. I also hold some smaller shares of other species IFQ's in which the biomass is somewhat stabile, but the presence of mussels make the gear of choice (bottom gillnets) basically impossible to operate. These habitat destroyers originated from ballast water discharge (mussels-zebra and quagga).

Both of these IFQ species were very commercially valuable and viable fisheries before the habitat issues following the Mussel invasion. Now they are no more. With the aforementioned habitat issues I'm very sensitive to habitat issues, as I've experienced firsthand what an invasive the size of a quarter could do to the world's largest freshwater system. On occasion I skipper a boat that I once owned on Lake Superior for Lake Herring and Whitefish for a 6 week season. Lake Superior so far has only been lightly touched by the mussel invasion.

The excessive escapements into various systems in the Cook Inlet drainage, -also are a deep concern to me, as I have watched the escapements change from biological escapement goals to politically driven escapement goals which by the recent returns, proves to me don't work. All river and lake systems have a certain carrying capacities, which I strongly believe are being repeatedly exceeded.

Not being given a reasonable opportunity to harvest all salmon species in Cook Inlet allows for the waste of these other salmon returns (Coho- Chum-Pink) as they one day also will fade, if they haven't already. These systems and returns have a carrying capacity also.

The processor component in Cook Inlet would also benefit from proper management of the Inlet's bounty. In the past few years, two of them have gone out of business for sure. The ones remaining in Cook Inlet have had a challenging time justifying their continued presence in Cook Inlet, I'm sure. This would also create some more badly needed jobs on the Kenai Peninsula. Any increased volume to the processors would result in some badly needed additional hours for all employed in this sector. Historically, I believe processor crews make their real money while on overtime. Once the processor crews make reasonable money, they tend to return the following season. A great win for the processing company. They then don't have to take resources to continually train a major portion of their crew year after year. Without processors in the Cook Inlet region, the fishery and all around it will certainly die.

I am also sensitive to the biologists who spent years gathering knowledge and are handcuffed by the prescriptive management, they are directed to follow. Rather than the adaptive management they went to school to learn. It must be very frustrating for them. I often ask myself who would want a job like that?

I am also no stranger to gear/user conflict issues as I sat on two ad-hoc task force committees tasked with more user conflict than gear issues in the early 1980's in Wisconsin, one of them lasting, if I remember correctly, over a 15 month span with monthly 2-3 day meetings. Which I see the upcoming meetings demanding similar attention.

During the late 1970's early 1980's I assisted the Wisconsin Department of Natural Resources in designing their stock assessment gear and a program that graded size mesh gear to reading scales for age composition of the catch. From the late 1970's-late 1990's my vessel was the successful bidder in three different specie stock assessments in the blue water. They since have acquired a vessel of their own to complete the stock assessments.

I currently live in Homer with my family. I like my father, have had my children, my daughter and my two sons, working with me on the water. My youngest son, soon to be 17 has the fishing curse if you will, hoping he has something fish for, if he so chooses. We all understand that commercial fishing is not for everyone.

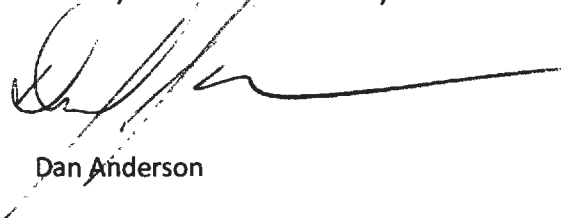
I am a member of the Homer Fish and Game Advisory Council (Homer AC) of which I am the chair of the fish sub-committee. I serve on the Board of Director's for the Upper United Cook Inlet Drift Association (UCIDA). I am also a member of the North Pacific Fisheries Association (NPFA).

I have attended the Board of Fish meetings over the last 10 years now that I live full-time in Homer. I currently hold 2 Cook Inlet Salmon Drift Permits that I fish on the boat that I first found my boots landing on so many years ago, though it has been refreshed a couple of times since then.

Please consider myself as a passionate user of the resources of Alaska. I might also add that I have participated in the Halibut and crab fisheries that Alaska has to offer. I and my family do respect and fully appreciate fish and game resources on our bows and actively participate in game and sport fisheries as time allows.

In closing, I look forward to assisting in the creation of the new FMP for Cook Inlet. With that, I fully understand that the time and energy that this committee needs to put into this process. Also, that the success of the outcome of this process will not be gauged short term, as it will take several generations of fish for them to balance out. If selected, I really am not expecting immediate personal benefit, but more so, for the generations that will follow. Hopefully we leave something for them.

Thank you ahead of time for your consideration,

A handwritten signature in black ink, appearing to read 'Dan Anderson', with a long horizontal flourish extending to the right.

January 26, 2018

Catherine Cassidy
PO Box 599
Kasilof, AK 99610

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Mr. Armstrong:

I am responding to the Council's request for assistance in identifying specific required conservation and measurement measures that a Salmon Committee can use to evaluate information and develop options for an FMP for Cook Inlet.

Thirty years ago I moved to Kasilof, Alaska with a background in health and social services. I ended up with a job in the seafood processing industry managing docks and buying stations in Southcentral Alaska. I discovered that being engaged in the harvesting and delivery of a sustainable, fantastic food product for humans was immensely satisfying. Currently, I am a Cook Inlet salmon drift permit holder.

In my time here I have paid close attention to the management of salmon in Cook Inlet. I have observed management of the fishery increasingly deviate from the MSA National Standard of Optimum Yield. Management measures have also strayed from the Standards of Scientific Information, Allocations, Communities and Safety of Life at Sea. The incremental, persistent erosion of the adherence to the National Standards in the state management of Cook Inlet salmon has absolutely harmed the salmon stocks, the commercial industry, our coastal fishing communities, like mine, and the supply of salmon to the nation.

It is no surprise to me that ADF&G's forecast for 2018 Upper Cook Inlet salmon is, again, predicting a below-average return. Other sockeye salmon runs around the state are breaking records. State management measures that undermine optimum yield in Cook Inlet are directly responsible for current poor returns.

Over the past 30 years, representatives from the Kenai River Sportfishing Association and the Matanuska-Susitna Borough have utilized pseudo-science and political influence to manipulate state management of the Cook Inlet salmon fishery with the goal of eliminating the commercial fishery in Upper Cook Inlet. Escapement goals, being the basis for our annual catch limits, have deliberately been set too high so as to afford persistent overescapements, thereby depressing subsequent returns. Fishery management plans have been devised and implemented to deliberately suppress the ability of commercial fleets to harvest salmon, increasing the persistent overescapements and decreasing the profitability of the seafood industry here. Intercept harvest of Cook Inlet salmon stocks in other areas is ignored. Serious production problems involving invasive species, loss of spawning and rearing habitat due to human development and sportfishing activity on spawning beds are denied and ignored.

Including knowledgeable local stakeholders in the Salmon Committee is essential for identifying the problems and will accelerate the process of applying required measures for an FMP. If members of the Kenai River Sportfishing Association and the Mat-Su Borough Fish and Wildlife Commission are included in the Committee, you will be assured of obstruction and obfuscation as they will continue to pursue their anti-commercial fishing agenda.

The state of the Cook Inlet fishery warrants an expedited response. The best way to achieve that is to include committee participants who are genuinely committed to sustaining the world class salmon resource in Cook Inlet for all users.

Sincerely,

Catherine Cassidy

Subject: input on Cook Inlet Salmon

From: Crowley Forestry C <crowleyforestry@hotmail.com>

Date: 11/28/2017 1:36 PM

To: "james.armstrong@noaa.gov" <james.armstrong@noaa.gov>

Mr. Armstrong,

There has been a call for comments and input on Cook Inlet Salmon. I have a few points I would like to make very clear to the State of Alaska, Federal Managers and NOAA.

- 1) Commercial harvest is a lower value than sport harvest
- 2) we do not have a beluga whale shortage, they are an indicator of the Salmon issue
- 3) you can manage the escapement of the Susitna based on the Kenai escapement
- 4) we ended market hunting for waterfowl and game because its exploitation of the resource
- 5) the State of Alaska and the Federal Government do not owe commercial fisherman a living (or anyone else)

1) The value per pound is demonstrably higher for sport caught fish than commercial caught fish. The sport harvest of fish has been crushed by the over fishing of the resource. The personal use and guided fishing efforts are at or near zero for Cook Inlet. The destruction of the Kenai River Kings is one of the most epic fails on the part of managers, allowing the commercial fleet to by-catch or target harvest kings at the expense of the entire Kenai sportfish industry. The story is even worse on Susitna rivers tributaries.

2) Beluga whales are not endangered in Cook Inlet because of Oil and Gas (Red Herring). There are no fish for them to eat. This is such basic science NOAA continues to overlook year after year. ITS JUST THAT SIMPLE, THERE ARE NO FISH IN COOK INLET FOR THEM TO EAT. Close commercial fishing for a few years and watch the whales "magically" return.

3) Managing the escapement of upper cook inlet based on how many fish escape into the Kenai might be one of the most absurd and criminal acts of mismanagement Alaska currently experiences. I can not begin to tell you how mind blowing it is to have a State ADFG fishery biologist hack tell me that there are no kings, reds or silvers in any of the upper Cook Inlet rivers and streams due to "climate change" or mysterious low returns while the commercial fleet posts RECORD HARVESTS IN COOK INLET YEAR AFTER YEAR. Madness, pure madness.

4) Market hunting for waterfowl nearly wiped out waterfall, bison in the lower 48 and severely impacted sheep and other wildlife numbers in Alaska. It was outlawed for sound conservation reasons. All of those species have rebounded thanks to P.R. funds from sport/subsistence hunters. Commercial fishing is indiscriminate killing of all fisheries resources. it is market hunting in the ocean and selling for pennies. Every species of concern right now (seals, sea lions, Yukon kings...polar bears) can be DIRECTLY ATTRIBUTED TO OVER FISHING BY COMMERCIAL FISHING. The commercial lobby is so powerful that mangers will come up with any reason to explain the shortages, lack of whales, declines in stellar sea lions and the lack of kings on anything EXCEPT WHOLESale EXPLOITATION OF THE OCEAN BY COMMERCIAL FISHING FLEETS. Commercial fishing = market hunting of the sea.

5) We made connection that commercial whaling was bad for whales so it was banned. We made very little move to protect the whaling lifestyle or jobs even though it was multi-generational. The Federal Government defaulted on timber contracts in the Tongass and made no attempt to save the loggers lifestyle

or jobs when clearly it was an institutional job sector. Why does the State of Alaska and Federal managers feel the need to protect commercial fishing, non-Alaskan fisherman, foreign companies at the expense of individual Alaskans and more importantly of the resource. we would never manage timber or any other renewable resource as poorly as salmon and ocean fisheries are managed.

Please do your job and curtail the exploitative commercial fishing before there is nothing left.

Regards,

Dane Crowley
BS Natural Resource Management--Plant, Animal and Soils
University of Alaska Fairbanks
Alaskan, professional forester, hunter and fisherman

January 30, 2018

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. Armstrong,

I am requesting appointment to the Stakeholder Committee that is to be formed to develop a new Salmon Fishery Management Plan for the Cook Inlet Salmon Fishery. I am currently employed as the Executive Director of the Cook Inlet Aquaculture Association. I will be retiring soon and can make a commitment to actively participate in the planning process.

Biographical Background:

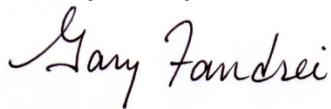
Please see the attached resume for a description of my background and qualifications.

Topics of Interest:

As the Executive Director of the Cook Inlet Aquaculture Association I have worked with various salmon populations throughout the Cook Inlet drainage focusing on the maintenance and supplementation of the salmon resource. Areas of particular interest include:

1. Conservation and management measures that are practical, legal, and sustain salmon populations throughout Cook Inlet's freshwater drainage.
2. In-season adaptive management strategies that:
 - a. allow for efficient, maximum harvests without compromising future returns through under- or over-escapement,
 - b. stabilize harvests as individual salmon populations fluctuate annually, and
 - c. recognize supplemental production from salmon population enhancement activities.
3. Stock status and interactions with freshwater invasive species like northern pike (*Esox lucious*) and elodea (*Elodea spp*).

Thank you for your consideration,



Gary Fandrei
Kenai, Alaska
907-398-4505

Gary Lee Fandrei

47074 Wildberry Court, Kenai, AK 99611 Home phone: (907) 283-4982 D.O.B 3/31/1953

Current Professional Experience

EXECUTIVE DIRECTOR. Cook Inlet Aquaculture Association, 40610 Kalifornsky Beach Road, Kenai, AK. 99611-6445. Tel: (907) 283-5761. FAX: (907) 283-9433. e-mail: gfandrei@ciaanet.org. 11/97 to present. Full-time position to provide direction and leadership to the Cook Inlet Aquaculture Association, a private non-profit corporation dedicated to salmon enhancement throughout the Cook Inlet drainage. Responsible for all aspects of the management of the Cook Inlet Aquaculture Association including budget (\$5.6 million), personnel, facilities, research, and project management.

Other Professional Experience

BIOLOGIST. 8/90 to 11/97. Cook Inlet Aquaculture Association, 40610 Kalifornsky Beach Road, Kenai, AK. 99611-6445. Tel: (907) 283-5761. FAX: (907) 283-9433. e-mail: gfandrei@ciaanet.org.

RESEARCH SCIENTIST II, 4/88 to 7/90; SENIOR BIOLOGIST, 3/85 TO 4/88; INTERMEDIATE BIOLOGIST, 12/82 to 3/85; POLLUTION CONTROL SPECIALIST II, 4/80 to 12/82; BIOLOGIST, 2/79 to 4/80 and POLLUTION CONTROL SPECIALIST I, 6/78 to 4/80. State of Minnesota, Pollution Control Agency, 520 Lafayette Road, St. Paul, MN 55155.

Volunteer Positions

Currently serving as a Director of the United Fishermen of Alaska (UFA) and Chairman of UFA's Fisheries Enhancement Committee. Also serving as Secretary/Treasurer of the Cook Inlet Regional Citizens Advisory Council (CIRCAC), a member of the Exxon Valdez Oil Spill Trustee Council's (EVOS) Public Advisory Committee (PAC), and Personnel Officer of the Kenai Composite Squadron of the Civil Air Patrol (CAP). Past volunteer positions have included serving as a member of the Prince William Sound Herring Recovery Steering Committee, a member of the Finance Subcommittee and the Hatchery Subcommittee of the Alaska Legislative Task Force on Salmon Fisheries and as a Director of the Cook Inlet Salmon Brand (CISB) *Kenai Wild* salmon marketing program, panelist on Alaska Department of Fish & Game (ADF&G) Alaska Chinook Salmon Symposium 10/22-23/12, and a member of the Paint River/McNeil River State Game Sanctuary and Refuge/Katmai National Park and Preserve Annual Review Group 2/93 to present.

Education

MASTER OF SCIENCE DEGREE. Environmental Biology. 12/77. University of Minnesota - Duluth. Attended 9/75 to 12/77.

BACHELOR OF SCIENCE DEGREE. Ecosystems Analysis. 5/75. University of Wisconsin - Green Bay. Attended 9/71 to 5/75.

CATALYST FOR NONPROFIT EXCELLENCE: INVESTING IN ALASKA'S NONPROFIT FUTURE. 10/28/13 – 7/14/14. The Foraker Group and Context International.

FORAKER CERTIFICATE FOR NONPROFIT MANAGEMENT. 9/16/05. The Foraker Group and the University of Alaska.

OTHER PROGRAM/MANAGEMENT TRAINING.

- Board Roles and Responsibilities – The Foraker Group 5/14/04
- High Performing Boards – The Foraker Group 5/14/04
- Business Planning – FastTrac – 3/1/04 to 5/3/04
- Effective Board Leadership – The Foraker Group 3/7/05
- Strategic Grantsmanship – The Foraker Group 11/21/05
- Nonprofit Finance – The Foraker Group 5/10/06
- Performance Evaluations – The Foraker Group 10/6/08
- Executive Director Evaluations – The Foraker Group 10/16/08
- Understanding Hour and Wage – The Foraker Group 3/31/09
- Nonprofit Turnarounds - - The Foraker Group 9/20/10
- The New Form 990 – The Foraker Group 8/27/12
- Leadership and Management Fundamentals – The Foraker Group 9/4/12
- Internal Controls – The Foraker Group 12/13/12
- Board Financial Oversight – The Foraker Group 9/13/12
- Preparing for the Audit – The Foraker Group 10/13/14
- Rules of Advocacy – The Foraker Group 1/6/15
- Gen X, Y, and Z: Retaining, Motivating, Onboarding, and Succession Planning – The Growth Company. 5/7/15 to 5/8/15.

SPECIALIZED TRAINING

- Standardization in Electrofishing – American Fisheries Society 5/22/13

CERTIFIED FISHERIES PROFESSIONAL.

- 1986 to 2009. American Fisheries Society. Board of Professional Certification.

Recent Studies/Research

Principal Investigator. SSSF 45459. 4/04 to 6/06. Project Title: Cook Inlet Salmon Enhancement. Objective: Further salmon enhancement in Cook Inlet.

Principal Investigator. SSSF 45548. 6/05 to 6/07. Project Title: Cook Inlet Salmon Enhancement. Objective: Further salmon enhancement in Cook Inlet.

Principal Investigator. SSSF 45608. 5/06 to 6/09. Project Title: Cook Inlet Salmon Enhancement. Objective: Further salmon enhancement in Cook Inlet.

Project Manager/Principal Investigator. SSSF 45786. 6/07 to 6/09. Project Title: Cook Inlet Salmon Enhancement. Objective: Further salmon enhancement in Cook Inlet.

Project Manager/Principal Investigator. SSSF 45787. 6/08 to 6/09. Project Title: Cook Inlet Salmon Enhancement. Objective: Further salmon enhancement in Cook Inlet – Paint River Fish Ladder.

Principal Investigator. AKSSF 45888. 7/09 to 3/12. Project Title: Sockeye Salmon Escapement. Objective: Assess Yentna River sonar counter and escapement to lakes with and without invasive northern pike.

Co-Principal Investigator. AKSSF 45918. 7/09 to 3/13. Project Title: Sockeye Salmon Escapement. Objective: Assess salmon production in lakes with and without invasive northern pike.

Project Manager. Subconsultant Agreement with McMillen, LLC. Grant Creek Salmon Escapement 2013. Assess salmon escapement to Grant Creek in support of Homer Electric Association Hydroelectric Licensing Application.

Recent Publications

Josephson, R., K. Brennan, J. Burke, G. Fandrei, B. Heard, J. Joyce, J. Milton, W. Prestegard, S. Rabung, S. Reifentuhl, and D. Reggiani. 2013. Consideration of hatchery projects as a means of mitigation impacts of declining Chinnok salmon runs and supporting research activities in Alaska. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 5J13-03.

Habicht, C., T. Tobias, G. Fandrei, N. Weber, B. Lewis, W. Grant. 2013. Homing of sockeye salmon within Hidden Lake, Alaska, can be used to achieve hatchery management goals. North American Journal of Fisheries Management, 33:4 777-782.

January 5, 2018

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, Ak. 99501-2252

Mr. Jim Armstrong:

I am writing in reply to your call for proposals to develop a Fishery Management Plan for salmon in the Upper Cook Inlet area. I am somewhat surprised that the Council wants the stakeholders to delineate what should be included in this Upper Cook Inlet Salmon Fishery Management Plan, as I think that NMFS and your legal advisors are better equipped to inform the Council of what is required under MSA. For the past forty years, the FMP has been out of compliance. It is time that the Council and NMFS meet the actual requirements of MSA and legally delegate fisheries management to the State of Alaska. In addition, an annual review of the State's management is warranted and required.

To that end, I think the Council should come into complete compliance as rapidly as possible by following an already approved Salmon FMP like that from the Pacific Council for the Pacific Northwest and retrofitting it to ensure complete compliance with MSA to meet the needs of an FMP in Upper Cook Inlet. To continue down the road of amending or trying to fix the past 12 amendments of the current FMP which the courts have already ruled are out of compliance seems like a complete waste of your time as well as that of the stakeholders. I would think NMFS and Council staff could retrofit this Pacific Northwest FMP for Cook Inlet in 2-4 months and give all interested parties a much better starting off point than the current discussion paper provides. If they can't let me know, I know I can write a compliant FMP in that timeframe.

In short the new FMP needs to address at a minimum the National Standards in MSA as well as other applicable federal law for the Cook Inlet Salmon Fishery as a whole. The State's escapement goal policy needs to be reevaluated to determine if it is a suitable replacement for ACL's for sockeye, Chinook and coho salmon. The State's management of the pink and chum fishery needs to be brought into compliance with MSA standards in all Cook Inlet waters as well. Currently there are no escapement goals for pink and chum salmon to base management on, so some sort of exploitation rate model will need to be developed. None of these problems are insurmountable or requiring the excessive amounts of time or money to develop solutions. If Council wants to come into compliance it isn't really that difficult. Again I would encourage you to start with the FMP from the Pacific Northwest and rework it to meet our needs in Cook Inlet.

Sincerely,

Jeff Fox
46677 Marie Ct.
Soldotna, Ak. 99669

Subject: Salmon FMP

From: Hannah Heimbuch <hannahheimbuch@gmail.com>

Date: 2/1/2018 11:59 PM

To: Jim Armstrong <james.armstrong@noaa.gov>

Mr. Armstrong —

Thank you for this opportunity to comment on the Salmon Committee scope of work. After looking over the most recent Council documents exploring the Salmon FMP and Cook Inlet considerations, I have just a few very general comments on the potential directions to be taken by the Salmon Committee. The work before them will be significant, and perhaps as important as what they discuss is who ends up in a position to discuss it. I look forward to seeing a committee that is as diverse in its stakeholder representation as possible, with a strong focus on science-based management and a commitment to a discourse that values the longterm health of all fisheries dependent on Cook Inlet salmon resources. I also hope that this committee will more generally recognize the wider community impacts that a healthy fishery with diverse stakeholders has on local economies, and work hard to overcome the often divisive history of this fishery's dialogue.

I encourage the Council and its various advisory and workgroup bodies will pursue a line of investigation and management options that favor strong continued state management, with minimal federal management, while satisfying the conditions put forward by the Ninth Circuit court ruling. I see this general way forward as the best option considering that NMFS currently lacks the existing infrastructure and expertise needed to manage salmon fisheries in Alaska, and that the Alaska Department of Fish and Game is well equipped to do so. I also think this is the best way to satisfy Standard 7, as more significant federal management will certainly fall in the category of being duplicative and not cost effective.

When considering fishery management options and mandates for the portion of Cook Inlet that falls under federal jurisdiction, I ask that the committee take into particular consideration National Standards 1, optimum yield; 5, efficient utilization of fishery resources; and 6, accounting for variation and contingencies. It is in these major areas that I see the greatest need for scrutiny and feedback from a team of experts and stakeholders. After six seasons as a Cook Inlet drift fisherman, I believe we are not fulfilling our potential and national commitment to achieve optimum yield and efficient utilization of fishery resources through regular fishing of Inlet wide areas — which I believe can be improved upon while maintaining a balance for escapement and for harvest by subsistence and sport users. I ask for the scrutiny of options that consider Standard 6 because of the variability of salmon runs year to year, and the variation of in-season management needs, and believe the committee should make recommendations that allow in-season managers the flexibility they truly need to meet the other national standards.

Thank you for your consideration.

Sincerely,
Hannah Heimbuch
Cook Inlet Drift Fisherman

January 24, 2018

Erik Huebsch
PO Box 599
Kasilof, Alaska 99610

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. Armstrong:

I am responding to the Council's request for assistance in identifying specific required conservation and management measures that a Salmon Committee can use to evaluate information and develop options for amending the Alaska Salmon FMP to include the Cook Inlet salmon fishery. I am also requesting to be named to the Committee to participate in developing the new amendment.

I have been actively involved in the NPFMC process regarding the Salmon FMP, and how it would apply to the Cook Inlet salmon fishery, since 2010. I have testified to the Council and the Advisory Panel on numerous occasions on this topic and participated in the salmon workshop that was held prior to the adoption of Amendment 12 to the Salmon FMP.

I have thoroughly studied the Magnuson-Stevens Act, the Alaska Salmon FMP, the Pacific Coast Salmon FMP, the BSAI Crab FMP and numerous other plans for other anadromous species across the US. I have participated in the State Board of Fishery meetings for over thirty years and am very familiar with Alaska fishery management policies and management plans. I think a framework plan similar to the BSAI Crab FMP would function well for a new amendment to the Alaska Salmon FMP. This would help to clearly define the responsibilities of the Council and the State and utilize the in-season management systems developed by the ADF&G. It's important to understand that, while the FMP provides the legal framework for the fishery, it must also provide functionality.

I believe it's necessary to include local informed stakeholders in developing a new amendment to the Salmon FMP for Alaska that includes the Cook Inlet salmon fishery. An informed stakeholder committee can assist the Council in understanding how the specific requirements in the MSA and the Ten National Standards can best be applied to the Cook Inlet salmon fishery. Stakeholders can identify areas of management concern that agency representatives often overlook. For example, in order for the Council to delegate management authority to the State, the MSA requires that state management complies with the MSA and the 10 National Standards. Stakeholders can best identify those areas where state fishery management practices do not comply. Currently, state management practices for the Cook Inlet salmon fishery do not even comply with state fishery management policies and have long ignored the requirements of the MSA and the 10 National Standards.

Another area where stakeholders could provide valuable insight is in determining OY values for different salmon stocks. For example, in Cook Inlet we have one of the largest wild runs of pink salmon in the State. In some years the pink run may easily exceed twenty million salmon and there is a tremendous and growing market for these salmon, yet the commercial fishing industry is only allowed to harvest a tiny percentage of the run. One ADF&G study indicated the recent commercial harvest rate at about 2 percent of the total pink run. To achieve MSY/OY on these stocks the harvest should range from 50-70 percent. The coho and chum salmon stocks in Cook Inlet are also clearly under-harvested. The salmon resources in Cook Inlet are an important food supply. To not fully utilize this resource causes harm to the local, regional and state economies and the food security of the nation. I think an important concept that must be integrated in the FMP is that for a semelparous specie like salmon, underfishing, and thereby exceeding the carrying capacity of the available spawning and rearing habitat, can be far more detrimental than overfishing. The most important point is that escapement (spawner) goal management for salmon be used as an alternative to ACL's to satisfy the requirements of the MSA, as provided for in the National Standard 1 Guidelines.

Having read the NMFS first discussion paper and the latest version, the Expanded Discussion Paper, it's clear that stakeholder input is essential to re-focus the discussion on the Cook Inlet fishery and comply with the requirements of the MSA. The discussion paper currently contains numerous incorrect statements and factual errors. Crafting a legal and functional Salmon FMP for Alaska, that includes the Cook Inlet salmon fishery, will require substantive changes in the information the Council is being provided.

I was born in Kenai, Alaska and grew up on and fished my family's set-net site near the Kasilof River. In the last forty years I have seined for herring in Prince William Sound, Togiak and the Alaska Peninsula, pot fished for King crab and Tanner in lower Cook Inlet, seined salmon in Prince William Sound, lower Cook Inlet and Kodiak and have participated in the drift gillnet salmon fishery in upper Cook Inlet since 1983. I believe that my wide range of experience in fisheries and management process would be of value in a salmon FMP stakeholder committee.

Thank you,

Erik Huebsch
Kasilof, AK

Wes Humbyrd
860 Willow Drive
Homer, AK 99603
907-399-4256
whum@acsalaska.net

January 27, 2018

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. Armstrong:

I am requesting to be named to the Stakeholder Committee that is to be formed as a required function in developing a new Salmon Fishery Management Plan.

I will begin with my connection to the **Fishery and Community History**.

1963:

I began fishing in West Coast Waters: salmon gill netting, dungeness crab, trawling for shrimp, bait fish for albacore tuna. Positions held were deckhand, skiff man and engineer.

1966:

I began fishing in Alaska and Northwest waters: salmon gill netting in Cook Inlet during Summer months, fished salmon and crab in Washington waters Fall and Winter months. Position held was skipper of own boat.

1971:

I moved to Seward, AK and began fishing Tanner Crab. Later that year moved to Homer and helped pioneer a Dungeness Crab fishery in Kachemak Bay. Fished Salmon and Dungeness crab during the summer. In Fall fished King and Tanner Crab in Kachemak Bay. Position held was skipper of own boat.

Late 1970's:

I was offered a job with ADF&G on research vessel Pandalus. I worked for ADF&G for 5 years in all areas of Cook Inlet, and Prince William Sound doing surveys of crab, shrimp and salmon.

1980's to present:

Went back to gill netting salmon in Cook Inlet. Position held was skipper of own boat.

Boards and Committees:

UCIDA board 6 years, currently regular member

Homer Fish and Game Advisory Board for 2 years, currently still serving on board.

Specialized Training:

Hazmat certified for over 20 years.

Participated in Oil Response Training and drills since they began here in Cook Inlet.

Worked with Alyeska Pipeline Services for SERVUS, since they began. 2 times was Task Force Leader in on-water exercises.

Worked with CISPRI, Cook Inlet Oil response for approximately 10 years.

Other:

Testified at Board of Fisheries for about 20 years.

Attended just about every workshop re: salmon committee and NPFC meetings in Anchorage and on Kenai Peninsula

If selected to be a member of Salmon Planning Team:

I would be interested in and would like to work on

- MSA Salmon Fishery Management Plan
- habitat of invasive species
- MSY, escapement goals so we can get optimum yield back
- how to build the run back as close to historic levels of the past
- in season adaptive management to have fish protected through their range
- allocation as per Magnuson Stevens Act Commercial, Recreational and Subsistence
- escapement goal not to exceed so we have no waste of any salmon species
- Cook Inlet has 2nd largest sockeye run in the USA and largest mixed stock fishery in the US, in the past a large percentage of salmon have been wasted

My request to be on the Salmon Stakeholder Committee is endorsed by UCIDA and CIFF.

Sincerely,

Wes Humbyrd



North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
james.armstrong@noaa.gov

January 31, 2018

RE: Public Comment on Salmon FMP for potential management measures in Cook Inlet

Dear Mr. James Armstrong,

Kenai River Sportfishing Association (KRSA) is a 501 c 3 charitable non-profit in Alaska, dedicated to the sustainability of one of the world's great sportfishing rivers, the Kenai. Over the years, through our fundraising efforts, KRSA has raised millions to support projects in habitat protection, angler access, fisheries management, research and education. KRSA works closely with federal, state, local and private entities to ensure the Kenai River and the greater Cook Inlet area remain healthy for fisheries, habitat and the generated social, cultural and economic values from this resource.

The North Pacific Fishery Management Council (NPFMC) is amending the Salmon Fishery Management Plan (FMP) to include traditional drift gill net fishing area in Cook Inlet within the management unit. Additionally, the Council is forming a Salmon Committee that will include stakeholders from the affected area, and will assist the development of the amendment by reviewing and recommending measures necessary to satisfy Section 303(a) of the MSA and related MSA provisions. To develop a scope of work for the Salmon Committee, the Council is soliciting written proposals from the public to help the Council evaluate relevant information to the development of options for a fishery management plan amendment.

KRSA is a stakeholder in the affected area, and we would like to participate in the Salmon Committee process. We put forth Kevin Delaney, a fishery consultant for KRSA and former sport fish director for the Alaska Department of Fish and Game, to represent our interests on the

Salmon Committee. He has a well-grounded and working understanding of the Cook Inlet salmon fisheries that extends back to the 1970s. His institutional knowledge can be extremely valuable to the committee process, and he will provide a level of critical analysis and ground-truthing that few others are able to do.

Additionally, KRSA provides the following initial public comment on measures that identify specific, required conservation and management measures for the Salmon Committee to evaluate relevant to the development of options for a fishery management plan amendment for the traditional drift gill net fishing area in Cook Inlet within the management unit.

KRSA appreciates the complexity of the Cook Inlet salmon fisheries, of which the drift gill net fishery is one part of a larger interconnected system. The regulations herein mirror **recent** (existing) state regulations for the drift gill net fisheries in the federal waters of Cook Inlet and should be the starting point of the committee work process.

Fishery Management Plan (FMP) for the Salmon Fisheries in the EEZ of Upper Cook Inlet (UCI)
Submitted by Kenai River Sportfishing Association (KRSA)

FMP for the Salmon Fisheries in the EEZ of UCI

- (a) The purposes of this fishery management plan are to ensure compliance with the National Standard Guidelines found in the Magnuson-Stevens Act with emphasis on ensuring adequate escapements of salmon into Central and Northern District drainages and to provide management guidelines. The salmon fisheries in the EEZ of UCI shall be managed in such a manner as to target only sockeye salmon and minimize the harvest of Northern District and Kenai River coho salmon in order to optimize total yield of the salmon resource by providing sport and guided sport fishermen a reasonable opportunity to harvest coho salmon stocks over the entire run.
- (b) The salmon fisheries in the EEZ of UCI shall be managed as follows:
 - a. Drift gill nets as described Alaska Regulation 5 AAC 21 are the only legal gear;
 - b. Fishing is allowed only during regular fishing periods as described as Monday and Thursday, 7:00 am to 7:00 pm;
 - c. The fishing season will open the third Monday in June or June 19, whichever is later, and
 - i. From July 9 through July 15,
 - 1. Fishing during at least **TWO** (one) of the regular 12-hour fishing periods will be closed;
 - ii. From July 16 through July 31,

1. At run strengths of less than 2,300,000 sockeye salmon to the Kenai River, **fishing in the EEZ will be closed;**
 2. At run strengths of 2,300,000 to 4,600,000 sockeye salmon to the Kenai River, fishing during at least one regular 12-hour fishing period per week will be closed;
 3. At run strengths greater than 4,600,000 sockeye salmon to the Kenai River, **fishing during at least one regular 12-hour fishing period will be closed.**
- iii. From August 1 through August 15,
1. Fishing during at least one regular 12-hour fishing period **per week will be closed;**
 2. If the Upper Subdistrict set gillnet fishery is closed then all salmon fishing in the EEZ is closed and;
 3. If the “1 percent” rule is triggered elsewhere in Cook Inlet for drift net fisheries then all salmon fishing in the EEZ is closed.
- iv. After August 15, fishing in the EEZ is closed.

Other factors that will be necessary to consider include, but are limited to: Stocks of Concern in the Northern District of Upper Cook Inlet for both sockeye and Chinook salmon; timeline action plan to reverse salmon conservation listings that are Stocks of Concern; Beluga whale threatened species listing; genetic testing for stock composition of drift gill net harvests; and, observer coverage.

We look forward to working with the Salmon Committee as it develops viable federal management options for the federal water traditional drift gillnet fisheries in Cook Inlet.

Respectfully,

Ricky Gease, Executive Director

Kenai River Sportfishing Association
224 Kenai Avenue, Suite 102
Soldotna, AK 99669
(907) 262-8588

Subject: Salmon Amendment Proposals

From: Joe Martishev <martishevj@gmail.com>

Date: 1/31/2018 2:05 PM

To: james.armstrong@noaa.gov

Hi my name is iosif martishev. I'm 25 years old, I have been a permit holder in Cook Inlet since I was 12 years old. I plan to fish here all my life or as long as it's financially viable. I would like to sit on the committee so a young fisherman's voice can be heard when creating the salmon fmp. With the mean average age of fishermen increasing, I believe it would be detrimental to the process for a young fisherman to voice his ideas and solutions in a way that resonates to the new generation of fishermen. If we are building a new plan to fish I think it's only fair to bring in new young fishermen . Thank you

Sent from my iPhone

Matanuska-Susitna Borough



January 31, 2018

North Pacific Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: Salmon Fishery Management Plan (FMP) & Committee

The Matanuska-Susitna Borough Fish and Wildlife Commission (FWC) is an all-volunteer commission appointed by the Borough Mayor and Assembly. The FWC works on behalf of the citizens of the Mat-Su to protect fisheries and fish habitat for the benefit of our community and maximum utilization by all user groups. The FWC offers the following suggestions for the Salmon Committee to consider for a fishery management plan amendment:

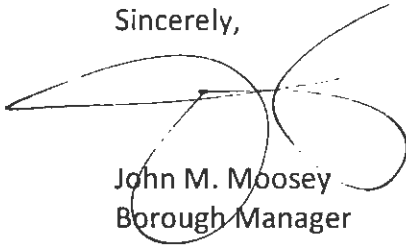
1. The stakeholder committee should consist of individuals that participate in fisheries throughout Upper Cook Inlet (UCI) (subsistence, personal use and commercial) not just individuals that fish Exclusive Economic Zone (EEZ) waters. Harvest activities within the EEZ will impact all salmon stocks and species as well as all users of these salmon.
2. The stakeholder committee should evaluate existing State management and regulations to determine if they involve sound principles of conservation and are consistent with federal laws that can be incorporated into an amendment of the federal fishery management plan (FMP) for UCI.
3. The stakeholder's committee should evaluate whether escapement goal management (when coupled with other in season measures of stock abundance) is an appropriate alternative to annual catch requirements (ACL). The North Pacific Management Council (NPFMC) primarily manages fisheries under their jurisdiction via Magnuson-Stevens Act (MSA) approved ACL's. However, this type of management is not well suited to the migratory nature of salmon and the difficulties in accurately estimating annual abundance.
4. The stakeholder committee should evaluate the complex mixed stock-mixed species harvest from the EEZ and determine if optimum yields might be better achieved in a more terminalized UCI fishery, i.e. harvesting nearer to shore where stock separation is better known and achieved. The State has been moving toward reduced EEZ harvests as stock identification information (genetics) has become available and permits harvesting nearer to natal drainages.
5. The stakeholder committee should evaluate the impact of the mixed stock harvest from the EEZ on northern Cook Inlet stocks. Currently northern drainages have 8 of 14 statewide Stock of Concerns. Susitna River drainage sockeye salmon (formerly the second largest sockeye stock in UCI) has been labeled a Stock of Concern for over a decade. And sockeye populations within the Susitna drainage such as Shell Lake sockeye appeared poised for extirpation. The committee should further consider if the EEZ salmon harvest has a significant impact on the food of the UCI Beluga whale which are presently an endangered species.

John M. Moosey * Borough Manager * 350 E. Dahlia Avenue * Palmer, AK 99645
907.861.8689 * john.moosey@matsugov.us

6. The stakeholder committee should be aware that UCI sockeye salmon (and likely other species) are harvested in fisheries at least as far away as Kodiak and probably along the Alaska Peninsula as well. These harvest data, much of which is “new” information must be accounted for in determining the level of harvest from the UCI EEZ waters.

The Matanuska-Susitna Borough Fish and Wildlife Commission appreciates the opportunity to provide input in this process and respectfully requests to be included and actively involved in any stakeholder workgroup discussions to address revisions to the Salmon FMP impacting Cook Inlet.

Sincerely,



John M. Moosey
Borough Manager

cc: Borough Assembly
Borough Fish and Wildlife Commission



Date: November 27, 2017

Address: Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. Armstrong:

I am requesting to be named to the Stakeholder Committee that is to be formed as a required function in developing a new Salmon Fishery Management Plan for the Cook Inlet Salmon Fishery.

Biographical Background:

1. Cook Inlet Salmon Fisherman, – 44 years
2. Halibut Longline Fisherman – 25+ years
3. 100 Ton USCG Master License – 30 years
4. Alaska Fish & Game Advisory Committee – 6+ years
5. United Cook Inlet Drift Association (UCIDA) Executive Director – 10+ years
6. North Pacific Anadromous Fish Commission (NPAFC) – 5 years
7. Degrees: B.S. Biology, M.S. Resource Management, PhD, Renewable Resource Management
8. Beluga Whale Recovery Team – Current member
9. Oil Spill Response Vessel Operator – 8 years
10. Cook Inlet Aquaculture Association (CIAA) Board of Directors – 6 years
11. University/College Professor (Retired) – 30 years
12. UCIDA/CIFF Case Manager – current
13. Materials Read:
 - Salmon FMP, Amendment 12, 1990
 - Pacific States Salmon Management Plan: Washington, Oregon and California, 2016
 - A History of Upper Cook Inlet Salmon Fisheries, A Century of Salmon
 - Magnuson-Stevens Fishery Conservation Act (MSA), 1996, 2006 Reauthorization and Current 2017/2018 Reauthorization (proposed changes)
 - UCIDA/CIFF legal documents and all legal filings associated with Amendment 12
 - MSA – National standards – Guidelines 1-10

- Atlantic Salmon Fishery Management Plan
- Atlantic Sturgeon Fishery Management Plan
- American Shad and River Herring Fishery Management Plan
- Review of Escapement Goal Policy and Processes (ADF&G)
- Review of Escapement Goals in Upper Cook Inlet, Alaska. 2016, 2013, 2010
- Upper Cook Inlet Annual Management Reports, 2000 through 2016
- Kodiak Annual Management Reports, 2000 through 2016

I am interested in working on the following topics:

1. Conservation and Management Measures that are practical and in legal compliance with MSA and the 10 National Standards
2. Stock Status Determinations – I have for tracked and kept up-to-date records on the Cook Inlet salmon populations for over 20 years. There are hundreds of unique salmon populations that have different run timings, sizes and productivities. I am interested in keeping the ecological and genetic balances in and among these different species and populations.
3. Escapement Goal Management as an alternative to Annual Catch Limits (ACLs), Accountability Measures (AMs) and Over Fishing Levels (OFLs). How escapement goal management will be utilized as a management tool and possibly work alongside ACLs, AMs and OFLs is an interesting and challenging task. This is an area that is of high interest to me. MSY/OY determinations and food security are of particular interest.
4. The Cook Inlet Salmon Fishery requires careful considerations and recommendations as a new Salmon FMP is developed. The “Fishery Unit” issue needs to be decided and compliant with MSA and the 10 National Standards. It also needs to be clear to the Stakeholders.
5. In-Season Adaptive Management and Accountability Measures will be something the new FMP will have to address. How the in-season decisions are made and by whom is of great interest to me.

Thank you for your consideration,



Roland Maw
Kasilof, Alaska
907-398-7992

January 30, 2018

Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Cook Inlet Salmon FMP Committee

Dear Mr. Armstrong,

My name is John McCombs. My background includes:

- Cook Inlet Fisherman's Fund (CIFF) President
- United Cook Inlet Drift Association (UCIDA) Board Member
- Cook Inlet Aquaculture Association (CIAA) Board Member
- Central Peninsula Fish & Game Advisory Committee
- 40 years fishing in Cook Inlet Fishing
 - Drift Gillnetting
 - Halibut Long Lining
 - Salmon Seining
 - Other Various Fisheries

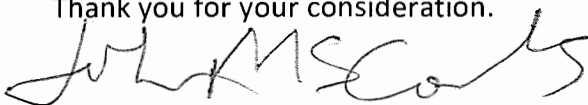
After reading the Magnuson-Stevens Act, there is, aside from the 10 National Standards, a certain poetic phrase that resonate with me: The intent of MSA "to preserve the character of coastal communities."

At one time, there were two canneries in Ninilchik. When they closed, many jobs were lost. A charter industry expanded. What happened to the 10 National Standards here in Cook Inlet?

I would like to see a healthy resource and viable fishery in the future, consistent with the tenants of MSA and the 10 National Standards.

I am confident I can contribute in constructing a functional FMP as a committee member.

Thank you for your consideration.



John McCombs

Ninilchik, Alaska

Jim Armstrong,

January 30, 2018

We, the undersigned, of the fishing community of Nikolaevsk (**Please see the attached brief History of Nikolaevsk**), are stakeholders in the Cook Inlet Fishery and submit for nomination, in order of preference, the following people for appointment to the North Pacific Fishery Management Council (NPFMC) advisory committee that will help develop a **New Fishery Management Plan** (FMP) for the Cook Inlet Salmon Fishery. We also support the United Cook Inlet Drift Association (UCIDA) and Cook Inlet Fisherman's Fund (CIFF) nominees for the Committee.

David Martin

Vasily Yakunin – Nikolaevsk resident commercial fisherman

Sergi Yakunin – Nikolaevsk resident commercial fisherman

Roland Maw

Erik Huebsch

Jeff Fox

Steve Vanek

Dino Sutherland

John McCombs

Dan Anderson

Our nominees are extremely knowledgeable of the record which is replete with the social and economic hardships Nikolaevsk and other fishing communities have suffered under the current Cook Inlet management plan. It's a plan that has

systematically worked toward the eradication of all commercial salmon fishing in Cook Inlet. It's a plan that does not comply with Magnuson-Stevens and a plan, as ordered by the Federal Court that must be replaced with a **New FMP**.

Those listed above are our fishing organization chosen leaders and fellow fishermen. We think they are the best qualified among us to work developing a New FMP for Cook Inlet Salmon. We are confident they will work toward a FMP that will comply with Magnuson-Stevens (the law) and by doing so will create an economically viable, stable, orderly, efficient and safe fishery which will benefit us in Nikolaevsk, other Cook Inlet fishing communities, Alaska and the Nation.

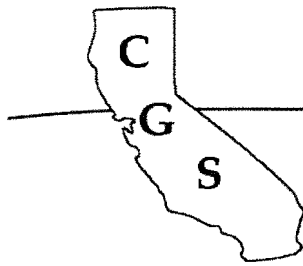
Again, we the undersigned of the fishing Community of Nikolaevsk are stakeholders in the Cook Inlet Fishery and respectfully submit our nominations for members of the advisory committee that will work to develop a **New FMP** for the Cook Inlet Salmon Fishery.

NOTE: Approximately one third of all the Cook Inlet Salmon Drift permits are held by residents of Nikolaevsk and other Russian Old Believer Communities.

STAKEHOLDERS OF NIKOLAEVSK ALASKA

- 1.) Fr. Nikolai P. Yakunin, Nikolai P. Yakunin, Little Dolphin C.I. drift
- 2.) Vasily N. Yakunin Vasily N. Yakunin
- 3.) Masha & Yakunin. Masha F/V Charisma C.I. drift
- 4.) Matthew J. Pancratz Matthew J. Pancratz F/V Little Dolphin C.I. drift
- 5.) Sozon Stare Fefelov F/V Ms. Cindy C.I. drift
- 6.) VICTOR YAKUNIN F/V Fire Fox C.I. drift
- 7.) Joseph Fefelov Joseph Fefelov F/V Amazon
- 8.) Evdokia Fefelov, Jonah Fefelov F/V Amazon Elizabeth Fefelov Zoya Fefelov
- 9.) Vitaly Fefelov, Mark Fefelov, Anatoli Fefelov, Vaa Fefelov F/V Fire Fox
- 10.) MARTIN RIZMIN Crew member F.V.
- 11.) FRANCISCO RIVERA F/V TONAMEL

12. Feodor RIVERA C.I. Drift Permit holder F/V Toname
13. MARIA Kulikov C.I. Permit also C.I. deckhand F/V Svet
14. AKCINIA Kulikov Permit holder / deckhand C.I. F/V Svet
15. CLAUDIA Kulikov C.I. Deckhand F/V Martichov
16. MAVERÄCKE Kulikov C.I. Deckhand F/V Martichov
17. Kira Tipikin C.I. salmon huggnets F/V Outlook
18. NIKIT Fefelov C.I. Permit holder F/V Player
19. NIKITA Fefelov C.I. captain F/V Player
20. Christina Fefelov C.I. Deckhand F/V Player
21. Isaac Fefelov C.I. Deckhand F/V Player
22. Elizabeth Fefelov C.I. Deckhand F/V Player
23. Max Gostevskiy F/V Lisa Ann C.I.
24. Teresa Krueger F/V Lisa Ann Deck Hand C.I.
25. Isaac Krueger F/V Lisa Ann Deck hand C.I.
26. DOMINIK MARTUSHEV F/V Player Permit holder cook inlet
27. MARIAMINA MARTUSHEV F/V Almaz crew. cook inlet
28. Michael Trail F/V Firebox crew cook inlet salmon drift.
29. KOLENIK Molodih F/V Transformer crew salmon drift
30. Randy Boguecos F/V Almas crew salmon drift
31. Gregory Trail F/V Amazon crew salmon drift
32. Evdoksia N. Lasiter crew salmon drift / F/V Little Dolphin
33. Alexander M. Lasiter crew salmon drift F/V Little Dolphin
34. Michael U. Lasiter crew salmon drift F/V Peregrine
35. Ivan F. Mametieff crew cook inlet Drift F/V Loner
36. GEORGE J. MARTUSHEV crew, cook inlet drift F/V Almaz
37. ALEKSEY YAKUNIN CAPT./SKIPPER COOK INLET TENDER F/V AKLEGAS
38. Alex Savelieff Deckhand, Cook, PWS Sailing F/V Silver Storm
39. Alexey Kalugin Cook Inlet Permit Holder F/V Silver Storm
40. Olga Mametieff crewmember LONER
41. Eric Mametieff F/V LONER Kachemak Gear Shed
42. Matt Trail Matt Trail Cook inlet salmon crewmember employee
43. Jeri Trail Jeri Trail Boat-owner fishery support.
Vessel-Support
44. Brian Whaley Brian Whaley crewmember
45. Steven Klach Steven Klach salmon drift teacher/coach Nikolayev
46. Beatrice D. Klach Beatrice D. Klach coach 29 1/2 years.



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Vol. XXXI, 1991

THE IMPACT OF RELIGION ON ETHNIC SURVIVAL: RUSSIAN OLD BELIEVERS IN ALASKA

Susan W. Hardwick

Historical and cultural geographers have long been interested in the processes of immigrant settlement and subsequent cultural change (Joerg, 1932; Jordan, 1966; Mannion, 1974, 1977; McQuillan, 1978; Ostergren, 1988; Swrerenga, 1985). However, except for limited studies of ethnicity in the central United States, very little has been accomplished to date on the significant relationship between religion and ethnic retention and sense of place (Jordan, 1980; Ostergren, 1981; Legreid and Ward, 1982). Russian Old Believers in North America offer a particularly fascinating case study for an investigation of the role of religion as a key variable in culture change. For over three hundred years, in Russia, China, South America, and the United States, Old Believers have maintained their Russian language, their religious beliefs, and their traditional lifestyle while living within very different, dominant majority cultures (Colfer, 1985; Smithson, 1976). Will they continue to

Dr. Hardwick received her Master's degree in Geography at California State University, Chico, and is now Associate Professor of Geography there.

maintain their distinctive cultural and religious identity in Alaska in the 1990s?

Regional Setting

The tip of the Kenai Peninsula can barely be seen in the thick coastal fog. Glaciated peaks, fiorded coasts, and roaring mountain streams dominate first impressions of this rolling, spruce-covered landscape. Old Believer settlements in Alaska are located in isolated, inaccessible places in three regions of the state of Alaska including Kenai forests, the Matanuska Valley, and islands just north of Kodiak (Figure 1). The largest community, Nikolaevsk, with approximately sixty families, is near the southernmost tip of the Kenai Peninsula and is connected to the small towns of Anchor Point and Homer by challenging dirt roads. Other Kenai villages, also on dirt and gravel roads barely accessible even by hardy four wheel drive vehicles, lie "up Kachemak Bay" on a narrow coastal strip atop a steep bayside escarpment. Old Believers have also begun to settle remote islands just north of Kodiak, accessible only by sea plane or boat. These villages offer the cultural geographer an opportunity to study Russian culture and religion in an isolated, real life setting and thus provide an excellent opportunity to observe the processes of religious and cultural change firsthand. Four aspects of Old Believer culture are considered here: religious origins, migration patterns, lifestyle and cultural retention, and the religious landscape.

Origin of the Old Believers

Before an analysis of the Alaskan Old Believer landscape is possible, it is necessary to understand their origin and diffusion from their homeland. Russia, long a loose conglom-

a result of these fears, five families left Oregon for Canada and Alaska in 1968, settling along the Plat River in northern Alberta and on the Kenai Peninsula in Alaska in 1968 (Figure 2).

Alaskan Migration and Settlement

The difficult trip from Oregon to Alaska was nothing new for the Old Believers. As described above, for over three hundred years, they victims of religious persecution had been seeking resettlement sites where they could maintain their traditional way of life and practice their religion in peace. Five Russian families originally left Woodburn, Oregon in heavily laden pickup trucks bound for yet another new life on the Kenai Peninsula. By 1990, at least ninety families resided in the area with over 1000 Old Believers living in six small settlements. Nikolaevsk, their original settlement, remains the largest and most "liberal" by local definitions (Moore, 1990). Due to a religious schism in the village, Old Believers founded four other villages nearby: Dolina, Rozdolna, Voznesenko, and Kachemak Selo. They have also expanded to the Matanuska Valley north of Anchorage as well as south on Raspberry Island near Kodiak.

With a loan from the Tolstoy Foundation in New York, Old Believers in Alaska originally purchased 640 acres of government-owned spruce forests on the Kenai Peninsula. Nikolaevsk, named for the important Orthodox saint Nicholas, grew and prospered for fifteen years as more families migrated from Oregon. Homes, roads, fences, and even a new state-funded school were built (Figure 3). Early settlers worked in nearby Homer fish canneries, the marina at Kachemak Bay, and in small construction crews in the area. However, fishing soon became the primary economic support for the new emigres. Today, at least ninety per cent of

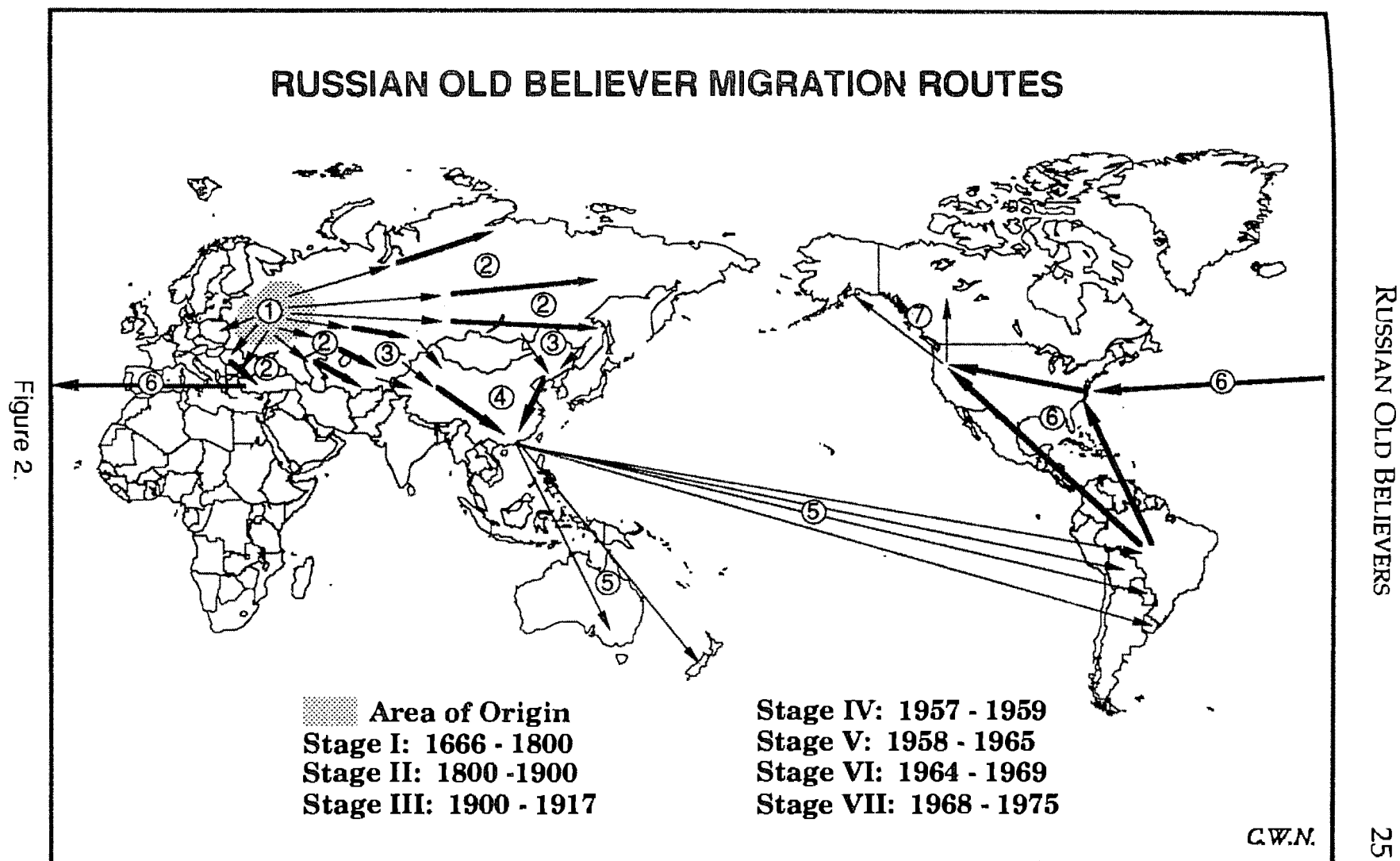




Figure 3. Nikolaevsk School

Alaskan Old Believer men fish for a living (Gay, 1988). Most are drift gillnetters in Cook Inlet, Bristol Bay, or Prince William Sound. Some fish for halibut in the Gulf of Alaska. Many learned carpentry skills in the lumbering industry in Oregon, and build and maintain their own boats (Figure 4). Harbors like this one at Ninilchik are filled with boats named the *Zion*, and the *Amur*. Russian settlers in Alaska prefer employment in the fishing industry because it offers them the opportunity to be their own bosses, work independently, and have the option of not working on the numerous religious holidays each year.

Lifestyle and Cultural Retention

Russian Old Believers in Alaska continue to maintain their traditional lifestyle within the larger context of American life. Although Nikolaevsk and other villages lie

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Figure 4: Old Believer Boats in the Ninilchik Harbor

far away from American mainstream culture, nearby towns are within driving distance and public school dominates the children's daily lives. Traditional Russian peasant clothing continues to be worn by all village residents, although young people may be seen with American T-shirts and Levi jackets pulled down over their embroidered Russian shirts and woven belts. The Russian language is spoken by children playing on village streets, in homes, and at church services (Figure 5).

Automobiles and the educational system are now the most potent agents of change among Russian Old Believers in Alaska. Bad weather limits the seasonal use of pickups, although high powered, fancy trucks are used regularly to drive to nearby fishing boats. The Nikolaevsk School is new and modern, housing grades K-12. Classroom teachers and counselors do not openly contest the religious ideas of Old Believer children, but exposure to new ideologies and "for-

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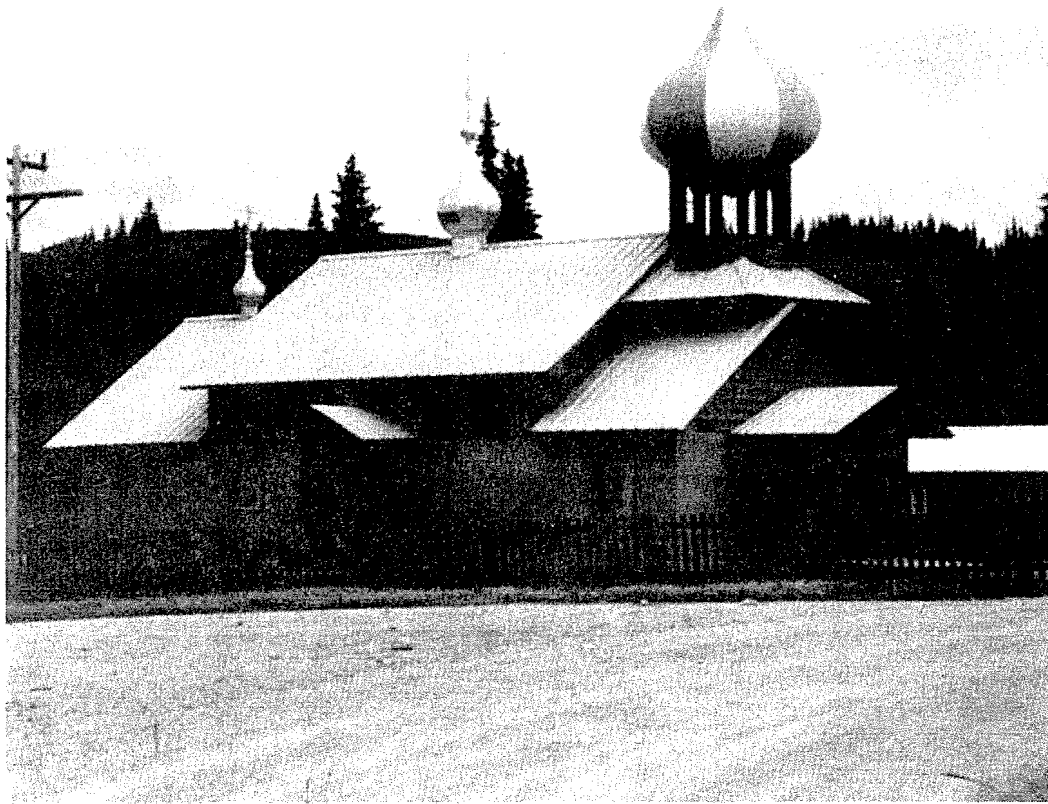


Figure 7. Russian Orthodox Church at Nikolaevsk

gion as a unifying force is being minimized. The overall strength of Starovery culture has long depended on the unity of their religious ideals. Although strict observance of religious beliefs and church doctrine continue to dominate their daily lives, divisions within the group have already created new rifts between and among villages. All culture groups continually are effected by both centripetal and centrifugal forces that tend to separate or unify their members. Such is the case among rural Old Believers in Alaska.

Conclusions

But internal issues such as religious practices, the increased mobility caused by trucks and automobiles, and the educational system are not the only active forces for change among Old Believers. Several external forces have also been

at work. Much of the overall physical and human environment has changed since the late 1960s when Russian migrants first arrived on the Kenai Peninsula. When the settlement of Nikolaevsk was founded in 1968, the nearest towns of Anchor Point and Homer were tiny villages of less than 1000 people each. The tsunami triggered by the Alaskan earthquake of 1964 had caused significant damage to the Homer Spit and retarded overall coastal development in the region. When the Old Believers first saw the site of their new home, it was a much less developed place than it is today. In the two and a half decades since the earthquake the area has witnessed increased development of the tourist economy, an expansion of its importance as a sport and commercial fishing center, and a significant increase in its total population. In addition, Old Believers began to subdivide their land in the 1970s as the petroleum industry improved the Alaskan economy. Now, modern new non-Starovery homes line both sides of Nikolaevsk Road on the way into the village. Old Believers may soon find themselves once again surrounded by the culture they tried to escape when they left Oregon.

In the midst of social and economic development on the Kenai Peninsula, increased mobility due to increased vehicle ownership and improved roads, and fragmentation caused by religious dissension, future cohesion of Old Believer culture is in doubt. For three hundred years the Starovery have been migrating to new lands in search of religious freedom and an isolated lifestyle. Their culture and beliefs have thus far survived war, poverty, dislocation, and numerous other socioeconomic challenges. Longitudinal studies of this fascinating group of Russians need to be conducted at regular intervals in the near future to document the process of cultural change. Whatever the future holds for this ethno-reli-

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gious group, the complex patterns of the migration, resettlement, and cultural retention of Russian Old Believers in Alaska thus far can only be viewed as remarkable.



Acknowledgements

My master's thesis chair, Dr. Margaret Trussell, expanded her interest in historical settlement in the American West in graduate school at Berkeley and later refined it at the University of Oregon. Dr. Trussell, along with Dr. Ladd Johnson and Dr. Louis Mihalyi, shaped my early thinking in cultural/historical geography while I was a graduate student at California State University, Chico in the 1970s. My fascination with ethnic settlement, religion as a cultural variable, and the regional geography of the American West first bloomed at Chico under their guidance. My graduate committee taught me to dive enthusiastically into archival material, tabulate historic census data carefully but suspiciously, and conduct sensitive structured and unstructured ethnographic interviews. This broad background in the methodologies of historical geography was complemented by Dr. David Lantis's insistence on the importance of "good field geography" and Dr. Art Karinen's cartographic expertise. My interest in ethnic settlement patterns in California was encouraged at Chico during a time of decidedly non-ethnic consciousness in academia and my dreams of a teaching position in higher education were supported and nurtured during a time of high unemployment in the educational field.

Dr. Trussell's research on pioneer settlement in particular, was the origin of my long term fascination with immigrant settlement patterns. This paper is a Trussell-inspired study

of settlement and culture change within a little studied and often misunderstood ethno-religious group in the American West, the Russian Old Believers.



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February 1, 2018

National Oceanic and Atmospheric Organization (NOAA)

North Pacific Fisheries Management Council (NPFMC)

Plan Coordinator; 907-271-2805/james.armstrong@noaa.gov

Re: Suggested proposal and scope of work for addressing the Cook Inlet Federal Fisheries Management Plan and personal request to participate in the Salmon Committee.

Mr. Armstrong,

I am writing today to express my desire to contribute to the proposed Cook Inlet (CI) Salmon Fisheries Management Plan Stakeholders Committee as they review and recommend an FMP that will adhere to the 10 National Standards.

In my additional notes, I have specified some of the main points that I believe the discussion should be centered around. Clearly, the MSFCMA (MSA) has been around for decades and amendments continue to strengthen the sustainability measures while offering economic stability to those who depend on the marine resources to strengthen our economy. Recreational and subsistence interests also play a significant role in maintaining Maximum Sustained Yield goals.

Since the mid 90's when the State of Alaska adopted the Sustainable Salmon Fisheries Policy (SSFP), the Alaska Department of Fish and Game (ADFG) has implemented a conservation program that is similar to the conservation goals of the MSA. The Alaska Board of Fisheries (BOF) establishes the policies on how the conservation and utilization of the resources will be managed.

The North Pacific Fisheries Management Council (NPFMC) with the guidance of the National Marine Fisheries Service (NMFS) works in similar fashion although the Federal arm clearly holds the authority over State management as the Commerce clause in the US Constitution recognizes that the States have the responsibility to conserve the resource for the benefit of all citizens of the country. The Federal Government holds the final say in the Public Trust of maintaining access to all citizens of the country.

There are several issues to address in any FMP, so it would be difficult to address all in this writing, so I will center the one provision-definition that I believe is a healthy starting point.

The definition of Maximum Sustained Yield (MSY) are very similar in both State and Federal language. It is the clear definition of and Optimum Yield (OY) in Federal terms and management that does not align with the State of Alaska's definition of an Optimal Escapement Goal (OEG) or Optimum Sustained Yield (OSY).

While the Federal system uses the OY tool to rebuild stocks overtime with minimal impacts to achieve MSY, the State uses OSY as a way to subtract from a given stock that has already achieved MSY. Therefore, the goal of the State is not to maintain an MSY expressed as a range overtime. The State's idea is to manage for the minimum goal in certain fisheries which overtime does not maintain the strong concepts of MSY. They continue to accommodate one user group over another which risks the high perpetuation of salmon at the expense of traditional Federal waters fisheries. Meanwhile, other Federal and State waters commercial fisheries with resident and non-resident participants are continually subjected to economic instability because of these incongruent management definitions/provisions.

My initial proposal would be to analyze both management definitions as a way to find a common ground to implement an Annual Catch Limit (ACL) based on sustaining salmon resources as close to MSY as possible.

Working with the State fisheries managers, considering pre-season forecasts and the science arm of the NPFMC and NMFS I believe that the first National Standard should be the first rule of the plan to address.

Several other Standards will also be needed to be addressed with NS-1 that are relative to the outcome of a workable management plan. They are NS 2,3,4 and 8.

I have been a commercial salmon setnet fisherman for 49yrs. I have been a member of several fisheries organizations as I have listed below. Our fishery is conducted within three miles of the shoreline in Cook Inlet. The concern amongst fishermen in our domain is that whatever happens out in the Federal fisheries may significantly or adversely affect the State management and thus the opportunities to harvest salmon stocks bound for the Kenai and Kasilof Rivers on the eastside of beaches of Cook Inlet.

We are aware of the discussions that the Council has had over jurisdictional issues as it relates to land, water and submerged lands that the Federal government has management authority over in both the Kenai and Kasilof River watersheds. We do know that many of the salmon species that are bound for these systems spawn and rear in these Federally managed units.

The State has a history of not implementing some Federal conservation proposals for certain stocks of salmon on the Kenai River and elsewhere. The new concept to discuss here is that the Federal managers have not taken a position on maintaining a healthy MSY management plan for in river salmon species or a macro watershed goal that is already addressed in NS 1 with its components.

Questions Here: Does continually exceeding or returning large escapements of salmon at the high end of a BEG/MSY goal jeopardize the future of high productive returns? Do we have enough scientific information to give us a relatively clear picture on how to achieve MSY on say the returning sockeye bound for the Kenai and Kasilof Rivers? Does managing the specific resource over the management goal in an OEG or OSY established simply to accommodate some user groups while significantly or adversely impacting the traditional commercial fisheries in Federal waters and possibly violate NS 4?

These are questions that I believe need to be addressed in order to move forward with a CI Salmon FMP.

I am willing and ready to serve on any committee or task force that will address these important questions and others.

Thank you,

Paul A. Shadura II

P.O. Box 1632

Kenai, Alaska 99611

907.252.4290

sabaka@ptialaska.net

Selected rules that are pertinent to a Cook Inlet Salmon Federal Fisheries Management Plan (FMP)

To develop a scope of work for the Salmon Committee, the Council is soliciting written proposals from the public to help the Council identify specific, required conservation and management measures for the Salmon Committee to evaluate relevant to the development of options for a fishery management plan amendment.

SUBMISSION DEADLINE: FEBRUARY 1, 2018

Please submit written proposals to: james.armstrong@noaa.gov

Stakeholder Salmon Committee

The Council intends to form a Salmon Committee for stakeholders to address the required provisions for an FMP amendment to manage the commercial fisheries in the Federal waters of Cook Inlet.

To develop the scope of work for the Salmon Committee, the Council will solicit written proposals from the public to help the Council identify the specific required conservation and management measures under 303(a) of the Magnuson-Stevens Act and related Magnuson-Stevens Act provisions where a committee would assist in the evaluation of information relevant to the development of options for a fishery management plan amendment and serve a useful purpose.

Council and NMFS staff, working with ADF&G staff, will provide an update on the issues identified from this solicitation and a proposed timeline for engagement by a stakeholder committee at a future Council meeting.

With this information, the Council will determine the composition, scope, and schedule for a stakeholder workgroup and request stakeholder participation in the Salmon Committee.

§600.310 National Standard 1—Optimum Yield.

(i) Specifying maximum sustainable yield (MSY) and OY;

(2) Overview of Magnuson-Stevens Act concepts and provisions related to NS1—(i) MSY. The Magnuson-Stevens Act establishes MSY as the basis for fishery management and requires that: The fishing mortality rate must not jeopardize the capacity of a stock or stock complex to produce MSY; the abundance of an overfished stock or stock complex must be rebuilt to a level that is capable of producing MSY; and OY must not exceed MSY.

(F) *Minimum stock size threshold (MSST)* means the level of biomass below which the capacity of the stock or stock complex to produce MSY on a continuing basis has been jeopardized.

(v) *Specifying MSY.* (A) Because MSY is a long-term average, it need not be estimated annually, but it must be based on the best scientific information available (see §600.315) and should be re-estimated as required by changes in long-term environmental or ecological conditions, fishery technological characteristics, or new scientific information.

§600.305 General.

(i) The stock is an important component of the marine environment.

(ii) The stock is caught by the fishery.

(iii) Whether an FMP can improve or maintain the condition of the stock.

(iv) The stock is a target of a fishery.

(v) The stock is important to commercial, recreational, or subsistence users.

(vi) The fishery is important to the Nation or to the regional economy.

(vii) The need to resolve competing interests and conflicts among user groups and whether an FMP can further that resolution.

(viii) The economic condition of a fishery and whether an FMP can produce more efficient utilization.

(ix) The needs of a developing fishery, and whether an FMP can foster orderly growth.

(x) The extent to which the fishery is already adequately managed by states, by state/Federal programs, or by Federal regulations pursuant to other FMPs or international commissions, or by industry self-regulation, consistent with the requirements of the Magnuson-Stevens Act and other applicable law.

109-479

SEC. 303A. LIMITED ACCESS PRIVILEGE PROGRAMS. 16 U.S.C. 1853a

(a) **IN GENERAL.** —After the date of enactment of the Magnuson-Stevens Fishery

Conservation and Management Reauthorization Act of 2006, a Council may submit, and the

Secretary may approve, for a fishery that is managed under a limited access system, a limited

access privilege program to harvest fish if the program meets the requirements of this section.

February 1, 2018

Relationship with salmon.

I have been a commercial salmon setnet fisherman for 49 years, a third generational fisherman, evolving from subsistence lifestyles, salmon, halibut and herring fishing.

Commercial Fishing Entry Commission limited entry salmon dual permit license holder salmon setnet, Alaska DNR shore fishery lease holder.

I was an elected state-wide director and past vice president, currently an alternate on the United Fishermen of Alaska (UFA) board of directors.

Current finance chair and Cook Inlet Representative Incorporated (CIRI) representative on the Cook Inlet Aquaculture Association (CIAA) board of directors, 30+ years. (I have no policy making authority nor am I a corporate representative as this position only represents native commercial fishing interests in Cook Inlet waters.)

Past president, executive director and current director to the Kenai Peninsula Fishermen's Association (KPFA) board of directors.

Representative (elected by qualified commercial fishing groups within Cook Inlet and Kodiak waters) on the Cook Inlet Regional Citizens Advisory Council (CIRCAC), Protocol committee member, 15 + years of service.

Currently on the Kenai-Soldotna Fish and Game Advisory Committee (KSF&GAC), now seated as one of the three commercial fishing designated seats, 30 + years intermittent.

Current acting President of the Cook Inlet Revitalization Association (CIRA), A Cook Inlet setnet fleet reduction/buy-back based organization.

Past board director to the Kenai Natives Association (KNA).

Past director on the Cook Inlet Salmon Branding (CISB) organization.

Past committee stakeholder member to the Cook Inlet Beluga Recovery Plan Team (CIBRP), three-year commitment facilitated by the National Marine Fisheries Service (NMFS).

Committee member on the Alaska Mining Associations (AMA) fisheries sub-committee

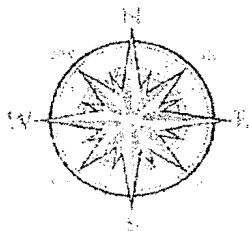
I live, eat and breath salmon issues all year long. Advocate in Juneau at times for fishermen, attend many Alaska Board of Fisheries meetings where I engage policy makers, attend North Pacific Fisheries Management Council meetings as they pertain to Alaskan near shore fisheries and Fisheries Management Plans (FMP) in Federal waters.

I am from a pioneering, homesteading family whose Alaskan heritage includes my grandfather who was a Russian priest his parish was church was in Kenai and he oversaw the greater Cook Inlet area. My veteran of the civil war Captain great grandfather shipwrecked on the Torrent in Port Graham in the late 1860's. Eventually settling on Unga Island in the Aleutians. He married an indigenous lady of Aleut decent. My mother was born in Vladivostok, Russia and lived in Irkutsk where her father managed the fisheries and other natural resources for the Russian crown.



United Cook Inlet Drift Association

43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438
• info@ucida.org •



COOK INLET FISHERMAN'S FUND

Non-Profit Advocate for all Commercial Gear Types in Area H

PO Box 39408 / Ninilchik, AK 99639 / Phone 907-252-2752 / Fax 907-567-3306

Date: December 4, 2017

Addressee: Jim Armstrong
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Call for Proposals, Salmon Fishery Management Plan

Dear Mr. Armstrong:

On behalf of the United Cook Inlet Drift Association (UCIDA) and the Cook Inlet Fishermen's Fund (CIFF) Board of Directors and respective membership, we submit the following comments in response to the North Pacific Fishery Management Council's (NPFMC) request for parties to submit scoping proposals regarding the development of a new Salmon Fishery Management Plan (FMP) for Cook Inlet. The Magnuson-Stevens Act (MSA) outlines the fifteen required topics and themes that are to be included in every FMP. The Ten National Standards specify the level and type of analysis required for each FMP. UCIDA expects the fifteen required content areas and the Ten National Standards will be included.

The UCIDA and ClFF membership includes individuals from various community entities and gear groups including drift gillnet, set gillnet, seine, longline, jig fishermen, pot fishermen, fish buyers, seafood processors, seafood marketing and retailing, as well as banking and financial institutions. Hundreds of our members are small business owners predominately from Alaska, but there are many individuals and businesses located in 40 of the 50 states and other countries. Our combined organizations represent thousands of individuals that directly contribute to the harvesting, processing, transportation and marketing industries. Our salmon harvests provide food for the nation, directly contributing to the food security and economy.

In preparing for the reply to NPFMC's call for scoping proposals, UCIDA and ClFF have held several Board of Director's meetings, conducted public outreach meetings which included various Non-Governmental Organizations (NGOs), environmental agencies, elected and appointed community leaders and legal advisors. These preparatory meetings occurred at the time and expense of the UCIDA and ClFF directors and organizations.

With the stated preparations, we submit the following scoping proposal comments. The following is not an exhaustive listing:

1. "Fishery" is a defined term in MSA and must be implemented as we have previously discussed and described in our public testimony, our legal teams' correspondence and the Ninth Circuit Courts' direction.
2. We concur that the scoping proposals should include:
 - Management policy and objectives
 - Conservation and management measures
 - Status determination criteria
 - Annual catch limits and accountability measures
 - Methods to report bycatch and measures to minimize bycatch and the mortality of unavoidable bycatch
 - The salmon plan team or other process for annually determining status of the stocks and providing stock assessment and fishery evaluation information
 - The process for review and appeal of State management measures applicable under the FMP

3. As a result of the scoping proposal developmental activities, we wish to include the following topics:

- Stock status determination criteria – salmon stocks
- What the plan covers – areas of fishery to be in the new plan
- MSY/OY determination – maximum yields/harvests, food production
- Social impacts, community impacts, community sustainability
- Banking and financial – access to capital, equity funding
- Economic issues and allocations – personal, community, borough, state
- Annual Catch Limits (ACLs) – Acceptable Biological Catch (ABC)
- Accountability Measures (AMs) – how to hold various managers & harvesters accountable
- Management unit, fishery – what is our fishery, geographically and genetically
- In-season adaptive management – who will manage and how will they manage inseason
- Essential Fish Habitat (EFH) – from 200 miles extending to headwaters
- Mortality & removals, gear harvests, bycatch and catch & release effects
- Management objectives – why have a new Fishery Management Plan
- Use of best science available – sonar, genetics, mark/recapture issues
- Conservation measures
- Scientific data needed into the future – genetics, salmon movements
- Escapement goal management as alternative to ACLs or AMs
- Fishing sectors and allocation: commercial, recreational & subsistence

Thank you for your consideration.

Sincerely,



David Martin, President
United Cook Inlet Drift Association

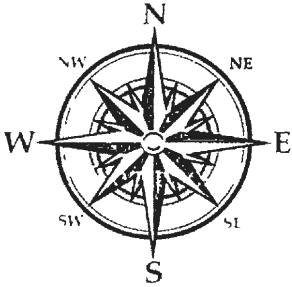


John McCombs, President
Cook Inlet Fishermen's Fund



United Cook Inlet Drift Association

43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438
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COOK INLET FISHERMAN'S FUND

Non-Profit Advocate for all Commercial Gear Types in Area H
PO Box 39408 / Ninilchik, AK 99639 / Phone 907-252-2752 / Fax 907- 567-3306

Date: January 31, 2018

Addressee: James Armstrong
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Re: Salmon Committee

Dear Mr. Armstrong,

United Cook Inlet Drift Association (UCIDA) provides the following comments and information to the North Pacific Fisheries Management Council (Council) and National Marine Fisheries Service (NMFS). Shortly after the Ninth Circuit Courts' Opinion, September 21, 2016, UCIDA and Cook Inlet Fisherman's Fund (CIFF) started a collaborated series of activities designed to establish a Salmon Committee as part of developing a new Salmon Fishery Management Plan (FMP). Multiple focus groups and workshop meetings were held for a broad spectrum of individuals from the Mat-Su Valley, Eagle River, Anchorage, Kenai, Soldotna, Ninilchik, Homer and East End Road Russian Villages. Thousands of pages of printed materials were handed out and discussed at these meetings. Printed materials included MSA, National Standards, policy papers and Essential Fish Habitat (EFH) documents. We have focused on specific issues concerning stock status, Stock Assessments and Fishery Evaluation (SAFE) reports, Annual Catch Limits (ACLs) and Guideline Harvest Levels (GHLs), spawning goals, indicator stocks, stock complexes, Maximum Sustained Yield (MSY) management, habitat and invasive species.

As a result of this collaboration, we currently have in draft a general umbrella plan for Alaska Salmon Fishery Management Plan that is 60+ pages. We also have, in draft format, a specific plan for the Cook Inlet Fishery that includes 10 topical discussions and is 50+ pages.

Currently, we have a revised edition of the Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska, NMFS 2017. This NMFS publication with our suggested edits will be an umbrella EFH plan for Alaska.

Lastly, we have prepared an EFH paper specifically for the Cook Inlet Fishery that is ~125 pages. By modifying and adapting existing policies and practices and including our draft documents, we estimate that we are 70-80% towards completion of a Salmon Fishery Management Plan for Cook Inlet.

Many individuals are involved in this FMP developmental process. The core group for UCIDA and CIFF includes David Martin, Erik Huebsch, Jeff Fox and Roland Maw. This group has met weekly to discuss, review and draft FMP language.

Please accept this letter as an application and an RFP response for the four (4) individuals, the core group mentioned above. UCIDA and CIFF nominate these individuals for the Salmon Planning FMP Committee.

UCIDA and CIFF were not sure, at first, what the request for proposals meant or what the expectations were. Upon further clarification, we have chosen to approach the development of the FMP utilizing the collaborative effort of fellow fishermen, processors, stakeholders and Non-Governmental Organizations. Environmental, subsistence and aquaculture associations have all been involved in this process. In addition, the UCIDA and CIFF Boards of Directors have actively participated.

For your reference, the UCIDA Board includes: David Martin, Erik Huebsch, Ian Pitzman, Dan Anderson, Ilia Kuzmin, John McCombs, Dino Sutherland, Steve Tvenstrup and Dyer VanDevere.

The CIFF Board includes: John McCombs, Mark Ducker, Janet Clucas, David Martin, Jeff Beaudoin, Jess Clucas, Dan Ducker, Chris Garcia, James Showalter, Steve Vanek and Teague Vanek.

The members of both the UCIDA and CIFF Boards also volunteer to be on the Salmon FMP Committee. We have spent hundreds of hours doing our due diligence in order to meaningfully participate in the development of the new Salmon FMP for Cook Inlet.

Sincerely,



David Martin, President
United Cook Inlet Drift Association



John McCombs, President
Cook Inlet Fisherman's Fund

James Armstrong
NPFMC
605 W. 4th Suite 306
Anchorage, AK 99501-2252

Dear Mr. Armstrong;

My name is Steve Vanek. I have been a drift fisherman in Cook Inlet for over 50 years. I still have my original limited entry permit which I qualified for in 1974. I wish to be on the Salmon Advisory Committee to develop the new salmon FMP. I have a historical prospective on what the fishery can be for the nation having fished for ten years before the Magnuson-Stevens Act was passed.

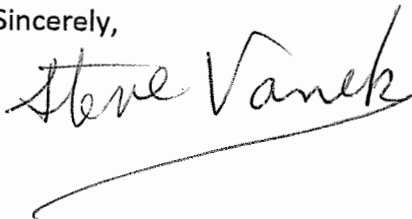
I came to Alaska in 1964 after the earthquake as an elementary school teacher in Homer. I have a BA degree from Oberlin College (1962) and a Masters degree from Stanford University (1969). I am a board member on numerous boards in Alaska. Among them are Cook Inlet Aquaculture Association (37 years); Cook Inlet Fisherman's Fund (30 + years); Ninilchik Emergency Services (20 + years); Central Peninsula Fish and Game advisory Committee (30 + years) and Ninilchik Senior Citizens (1 year).

Salmon is a resource that belongs to the entire nation. For many years there has been a huge surplus of salmon being wasted in Cook Inlet largely because there hasn't been an FMP for the Cook Inlet fishery. This is contrary to the best interests of the nation as well as contrary to the Magnuson-Stevens Act. I along with many others have work hard within the State's framework for the last 20 years to correct this situation without any success.

We need realistic escapement goals for all salmon based on the best science. We need to protect cities and towns that depend on the salmon industry as called for in Magnuson-Stevens.

Cook Inlet sockeye salmon is the second largest run in the state and need to be sustained using the 10 national standards of the Magnuson-Stevens Act. Salmon fisheries were the impetus for creating the ACT in the first place. Let's make the FMP a legacy of the MSA. I look forward to the development of a new FMP.

Sincerely,



Steve Vanek
P.O.Box 39103
Ninilchik, AK 99639
907-567-3470

Teague Vanek
P.O. Box 39251
Ninilchik, Ak 99639
(907)398-1153
November 28, 2017

Jim Armstrong
North Pacific Fisheries Management Council
605 W. 4th Ave., Ste 360
Anchorage, Ak 99501-2252

Mr. Armstrong:

Please consider my name in forming the Stakeholder Committee for the Cook Inlet Salmon Fishery Management Plan. I, along with my lifestyle, represent the very essence of the definition of a stakeholder in this issue.

I was born in Soldotna in 1967, have spent most of my life on the Kenai Peninsula, and continue to live in Ninilchik. My grandfather fished and was a fisheries manager in Cook Inlet and was also a member of the Board of Fish and Game in the 60's. My father has fished Cook Inlet since the early 60's, and I started fishing as soon as I was big enough. Big for my age, I was my father's only crew at age 13. I've fished every single year since 1980, and only the years 1985 and 1989 were not in Cook Inlet. I started running my own operation in 1990 at age 23, choosing to come back home for my livelihood after graduating from college. I now fish two drift permits in Cook Inlet on my boat "Proud Mary" and lease my older boat to another Cook Inlet fisherman. My children have fished with me and with others in Cook Inlet since they were 11 or 12 years old. I am 50 now and figure that I will need to go another 20 years, Lord willing, in Cook Inlet.

There are plenty of people with stories like mine, but it's hard to imagine that many have more of a connection, have been more affected by poor management by the State, or have more of an interest in the development of this federal FMP than I do.

In your consideration of me for the Stakeholder Committee, here is a little more of my history:

- High School: Graduated 1985 from Ninilchik High School.
- College: BA, Financial Management and Decision Sciences, College of Business and Economics, Western Washington University, 1989.
- Central Peninsula ADF+G Advisory Committee, member since 1999.
- Cook Inlet Aquaculture Assn., past member of Board of Directors
- UCIDA: member for over 25 years
- CIFI: member of Board of Directors for 15 years.
- Fishing: +Cook Inlet Salmon Drift permit holder since 1989

+Cook Inlet Setnet permit for several years, and owned a beach site.

+Crewmember for my younger years mostly in Cook Inlet, but also Bristol Bay and Prince William Sound.

+Halibut Longline: Own some 3A IFQ's, fish mostly in Cook Inlet.

+Smelt: Fish commercially for the last 12 years in Cook Inlet.

-Sport Fishing: I spent much of my younger days and still occasionally find time to spend wading the Ninilchik River to catch salmon. Nearly all the protein my family eats comes from hunting and fishing. Most of our table salmon is fresh caught in winter from Kachemak Bay sport fishing.

Also, in your consideration, please know that as a board member of CIFF and as a member of UCIDA, I have been aware of and participated in the many aspects of our industry's struggle with the State's poor management of our fishery. This includes the recent round of litigation which has led to the requirement of the N.P.F.M.C. to create a Fisheries Management Plan. I have attended and testified at many Board of Fisheries meetings. Many of the proposals the BOF has had over the years have been authored by me, and as a Central Peninsula Advisory Committee member I've participated in developing many other proposals.

When I bought in to the Cook Inlet fishery, the State of Alaska had been a good steward of the resource and maintained its duty providing for healthy harvests throughout the 80's. The State's Department of Economic Development had a good loan program to promote local ownership of permits. I feel that more than anyone I've been sucker punched by the State as Board of Fisheries actions have decimated our harvest opportunities and promoted the underutilization of Cook Inlet's salmon resources. One State agency promoted the debt load of resident fishermen, only to have another agency (BOF) pull the rug out from under our feet.

Interestingly, the damage done to our industry and resource by the State has occurred mostly since federal FMP oversight went by the wayside and the final straw was when the Council did away with its jurisdiction in 2012. The State has become well suited with ignoring the national standards set out in MSA, especially MSY principles. Just look what Cook Inlet harvest levels have become.

I am interested in having an FMP which results in the Council or the State performing its duty to the citizens with proof being harvest levels consistent with MSY and the other national standards set out in the MSA. The current breach of this duty by the State of Alaska has been injurious to myself, the fishing industry, and the citizens of this State and the Nation. The new FMP needs to remedy these injuries by promoting full use of our salmon resources in Cook Inlet.

I am interested in having an FMP which imposes MSY and OY guidelines on Cook Inlet salmon fisheries throughout their entire range as required by the MSA, not just in the EEZ or some restricted single ounce of water as indicated by the Ninth Circuit Court ruling.

I am interested in having an FMP which considers how escapement affects harvest levels, not just in the current year or even from individual return years but also how escapement level trends affect the harvest over many years down the road. We need to consider how much lower escapements in the 80's produced much higher harvest levels.

I am interested in having an FMP which does not require extended periods of restricted openings or outright closures to the commercial fleet almost regardless of how many fish are there. Any closures or restrictions need to be scientifically defensible. Broad swaths of closed fishing time and area by regulation have led to underutilization and overescapement. It's not using the best science, it's injurious to the industry, and it's been a breach of duty by the State to its citizens. The FMP needs to fix this.

I will be very interested to see that a federal FMP follows the national standards set out in the Magnuson-Stevens Act. If it does, it will undoubtedly provide for a more robust fishing industry in Cook Inlet.

Thank you for considering me for this stakeholder committee.

Sincerely,

A handwritten signature in black ink that reads "Teague Vanek". The signature is written in a cursive, flowing style.

Teague Vanek