

North Pacific Fishery Management Council

Dan Hull, Chairman
Chris Oliver, Executive Director



605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Telephone (907) 271-2809

Fax (907) 271-2817

Visit our website: <http://www.npfmc.org>

March 9, 2015

Ambassador David Balton
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Mr. David Kennedy
NOAA Special Advisor on Arctic Issues
National Oceanic and Atmospheric Administration
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Arctic Issues and the North Pacific Fishery Management Council

Dear Ambassador Balton and Mr. Kennedy:

I am writing on behalf of the North Pacific Fishery Management Council (North Pacific Council) with regard to the ongoing development of science and governance issues in the Arctic region. I would like to begin by expressing our sincere appreciation for Ambassador Balton's participation in our North Pacific Council's recent discussions of Arctic policy development, at our February 2015 meeting, along with Dr. Richard Merrick, Chief Science Advisor for NOAA Fisheries. With the numerous Arctic initiatives, science and governance forums, governmental agency strategic plans, etc. currently in play, it is often difficult for us to assess whether and how the Council should appropriately engage. Mr. Balton and Dr. Merrick provided us with an excellent overview of the current Arctic arena, including the implications of the recent Presidential Executive Order – Enhancing Coordination of National Efforts in the Arctic - and the evolving roles of NOAA and the U.S. State Department at various levels. They also provided us with valuable perspectives regarding the 8-Nation Arctic Council and the pending U.S. Chairmanship of the Arctic Council. As the only regional fishery management council with responsibility for Arctic waters, we wish to continue to be apprised of these various national and international initiatives and to be productive partners in the dialogue where relevant and appropriate. It is also important to underscore that the definition of the 'Arctic' in much of the national and international policy dialogue includes the waters of the Bering Sea and Aleutian Islands (and into the Gulf of Alaska), which fall under North Pacific Council management authority. In that vein we have a few specific observations and requests, in two key areas.

International Arctic Council

As you are aware, the Council has developed an Arctic Fishery Management Plan (FMP) for the Arctic waters in the EEZ north of Alaska, which in essence prohibits commercial fishing unless and until we have the scientific understanding necessary to ensure that any commercial fishing could be conducted in a sustainable manner. We understand this FMP embodies a management approach which the U.S. has been promoting to other Arctic Nations, and for international waters of the Arctic. We support the efforts by

the U.S. to secure an international agreement for the Central Arctic ocean that mirrors the action taken by the North Pacific Council through our Arctic FMP, which would prevent speculative fisheries in these international waters which could undermine the precautionary action taken by our Council. When considering other Arctic initiatives, it is critical to our North Pacific Council interests that, while we have developed an FMP specifically for the U.S. Arctic waters north of Alaska, the broader definition of the Arctic, and that used by the Arctic Council as well as domestic (NOAA) initiatives, includes waters of the Bering Sea and Aleutian Islands (and into the Gulf of Alaska) for which the Council maintains active fishery management plans. The fisheries subject to these FMPs harvest half of the Nation's total seafood catch annually and are critically important to the economies of coastal communities throughout Alaska and the Pacific Northwest.

Under these FMPs, the waters of the Bering Sea, Aleutian Islands, and Gulf of Alaska are also subject to wide-ranging closures to protect habitat or other species, many of these qualifying as 'marine protected areas', or MPAs. Of the approximately 1 million square nautical miles encompassed by our FMPs, roughly 66%, or two-thirds, of that area is subject to full or partial closure to fishing activities. As such we are particularly interested in the Arctic Council initiative to develop an international system of 'Arctic' MPAs, which could obviously overlap with existing closure areas under Council jurisdiction. While we understand that the Arctic Council does not have regulatory authority to create MPAs, and that creation of MPAs in U.S. waters would only be done through domestic processes, the development of programs and policies by the U.S. delegation, as well as the international discussion by the Arctic Council, are nevertheless of extreme importance to the North Pacific Council.

We are also of course interested in other aspects of the Arctic Council discussions which will be focus areas under the U.S. Chairmanship, including ocean acidification/climate change and the idea of a 'regional seas' program for the Arctic. The North Pacific Council, in partnership with NOAA and broad collaboration with other State and Federal agencies and stakeholders, has nearly 40 years of experience managing resources in the U.S. Arctic region and we believe that experience can add a very useful voice to the overall dialogue of the Arctic Council, and/or to specific workgroups of the Arctic Council. We in fact are in the initial stages of developing a Fishery Ecosystem Plan (FEP) for the Bering Sea which would complement our existing FMP, and our efforts in that regard could be very complementary to the interests of the Arctic Council.

Given our experience and interest in management of living marine resources in the Arctic region, we request that consideration be given to inclusion of a Council representative, either the Council Chairman, Executive Director, or designee for example, on the U.S. delegation to the Arctic Council. Such accommodation has been granted to other international State Department delegations, such as the North Pacific Fisheries Commission (NPFC) and the U.S./Russia Intergovernmental Consultative Committee (ICC), which also includes an advisory body, the Bering Sea Fisheries Advisory Body (BSFAB).

Executive Order and creation of Steering Committee

At our February North Pacific Council meeting we were also updated on the President's recent Executive Order to coordinate our National Arctic efforts, and the creation of a Steering Committee to oversee those efforts. It is our understanding that both of you will likely be involved with that Steering Committee, or be primary points of contact for your agencies. We note that the EO mandates engagement with the State of Alaska, Alaska Native Tribal Governments, and other stakeholders. We also note a primary objective of the EO is to "*have a coordinated national effort that takes advantage of our combined expertise and efforts in the Arctic region to promote our shared values and priorities*". Given the North Pacific Council's long record of successful resource management in this region (and noting again that the geographic definition of the U.S. Arctic includes vast areas largely managed by the Council and NOAA Fisheries), we believe it is necessary and appropriate to consult and collaborate with the North Pacific Council as the Steering Committee implements the President's EO.

Given the decades of experience we have in successful fisheries management, habitat protections, marine mammal interactions, reliance on science, and the national and international policy arena, we believe that the North Pacific Council brings a necessary and appropriate voice to the Arctic dialogue at several potential levels and we hope to engage when and where appropriate as that dialogue evolves.

Thank you once again for keeping us apprised of critical developments in the national and international Arctic arena and we look forward to continued collaboration in these regards. The North Pacific Council's primary point of contact for these matters is our Executive Director, Mr. Chris Oliver. Please do not hesitate to contact me, or Mr. Oliver, if you have any questions regarding our Arctic interests.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull
Chairman

CC: Secretary of State John Kerry
Secretary of Commerce Penny Pritzker
Dr. Kathryn Sullivan, NOAA
Ms. Fran Ulmer, Chair USARC, Special Arctic Advisor, U.S. Department of State
Admiral Robert Papp, Special Representative for the Arctic, U.S. Department of State
Dr. Douglas DeMaster, NOAA Fisheries AFSC
Dr. James Balsiger, NOAA Fisheries Alaska Region
Dr. Richard Merrick, NOAA Fisheries Chief Science Advisor
Acting Director, NOAA Fisheries Office of International Affairs