March 11, 2015

Admiral Paul Zukunft
Commandant
United States Coast Guard
2703 Martin Luther King Jr. Avenue, SE
Washington, DC 20593-7000

Dear Admiral Zukunft:

The North Pacific Fishery Management Council (Council) held its most recent meeting February 4 through February 9, 2015 in Seattle, Washington, during which we received a report on 2014 Coast Guard law enforcement efforts in the Alaska region. Information was provided on major cutter days and HC-130 flight hours deployed while patrolling the Bering Sea for fisheries monitoring and enforcement. The Council, after reviewing the information, is very concerned about the continuing downward trend in major cutter days and HC-130 flight hours dedicated to the living marine resource and law enforcement missions in the Bering Sea. The Council is also of course concerned with potential impacts to the adjacent Aleutian Islands area, as well as the Gulf of Alaska, but we understand it is the Bering Sea area that could be most affected by reductions in major cutter days and HC-130 hours.

In 2014, the number of major cutter days dropped to its lowest point in a decade from 788 days in 2004 to only 361 days in 2014. As for HC-130 utilization in 2014, there was an increase in flight hours, but the Council was informed that the Coast Guard will likely experience a significant reduction in these aircraft hours in 2015 due to a shift in mission priorities and deployments to other areas of the U.S. The Council recognizes that the reduction in major cutter days in the Bering Sea is influenced by the Coast Guard’s multi-year recapitalization of major cutters, while the reduction in HC-130 patrol hours is influenced by varying mission requirements throughout the U.S. Nevertheless, the continued reduction of Coast Guard resource hours in the Bering Sea is a concern for the Council as this decrease could jeopardize the Coast Guard’s ability to enforce the laws and regulations pertaining to fisheries and safety in the Bering Sea. In addition, the Council is also concerned that the expanding role of the Coast Guard in the Arctic may divert major cutter and aircraft assets that are normally reserved for the Bering Sea to the expanding role in the north. With Coast Guard assets at their lowest levels in over a decade, diverting resources to the Arctic could further impede the critical enforcement and monitoring mission of the Coast Guard in the Bering Sea.

The Council appreciates the considerable effort by the Coast Guard in monitoring and enforcing the Nation’s fisheries laws and regulations under a climate of challenging budget constraints. As the Coast Guard continues to plan for future deployment of major cutter days and HC-130 resource hours in the coming years, the Council would encourage the Coast Guard to consider increasing major cutter and aircraft operations in the Bering Sea in order to ensure the highest level of at-sea law enforcement presence in order to protect these vital fisheries and industries. And, while we appreciate the importance of the Coast Guard’s role in the Arctic region, we hope that assets used in that expanding Arctic role not
be diverted from those assets normally utilized in the Bering Sea for enforcement of fisheries and safety laws and regulations.

Our successful fisheries management program in the waters off Alaska depends greatly on the U.S. Coast Guard, and we appreciate your efforts to maintain Coast Guard assets currently deployed in the Bering Sea, as well as the Aleutian Islands and Gulf of Alaska. Please contact me or the Council’s Executive Director, Mr. Chris Oliver, if you have any questions regarding this correspondence.

Respectfully,

Dan Hull
Chairman

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