



North Pacific Fisheries Association, NPFA

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

Dear Chairman Kinneen and Members of the Council:

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

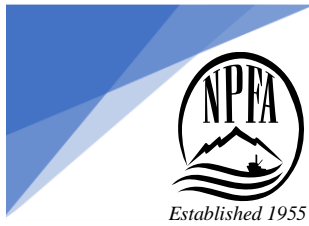
NPFA supports Alternative 2: Federal management of the commercial fishery in the EEZ with specific management measures delegated to the State.

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

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

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

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



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

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

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

Sincerely,

Malcolm Milne, NPFA President