



North Pacific Fisheries Association, NPFA

P.O. Box 796 Homer, AK 99603

npfahomer@gmail.com

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North Pacific Fishery Management Council
Re: Agenda Item C1 — 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 small 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.

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

Alaska has a right and responsibility to manage its valuable salmon resources and is best suited in infrastructure and expertise to do so. We believe any challenges posed by collaborative management can be overcome through ongoing cooperation. We are opposed to Alternatives 3 and 4, delegating EEZ waters to federal management. We are concerned that inherent challenges given NMFS' lack of salmon management infrastructure in Alaska, could lead to unnecessary restrictions in an already struggling fishery. Alternative 4 would deliberately close fishing in the EEZ, which NPFA opposes, and we understand per recent court decisions that it is not a viable option.

Broadly, NPFA is concerned that actions under C1 have the potential to harm salmon and other fisheries across the state spanning jurisdictions. Specifically, we are concerned about negative impacts to Homer and other southern peninsula communities. The EEZ area of the fishery has historically provided a substantial portion of the harvest, and the vast majority of the landings directed to Homer. Closing EEZ waters will substantially reduce fishing opportunity and is likely to eliminate the incentive for vessels to operate out of Homer. Portions of this and past analyses suggest that increased state water fishing will alleviate any harm from EEZ closures. Even IF that occurs, however, that would not address concerns for Homer, as any effective state water fishing takes place much closer to other offload locations.

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, moorage and essential marine trades services. The significant, long-term impacts to Homer by relocating fishing opportunity under Alternative 3 have not been analyzed or accounted for. We ask that the Council consider a path forward that meaningfully preserves opportunity in the EEZ.

Sincerely,

Malcolm Milne, NPFA President