

November 27, 2020

North Pacific Fishery Management Council

Re: Agenda Item C2 — Cook Inlet Salmon

Chairman Kinneen and Members of the Council:

I am a Cook Inlet drift fisherman from Homer, Alaska. My family has fished Cook Inlet for three generations, and I am one of five family members that are owner-operators in the Cook Inlet Drift salmon fishery. Thank you for this opportunity to comment on the Cook Inlet Salmon FMP Amendment.

I believe fundamentally in Alaska's leading right and responsibility to manage the entirety of this state's robust and diverse salmon fisheries for the benefit of all of its diverse users. Considering that constitutional responsibility, and considering the requirements laid out in both Magnuson and the court ruling impacting this issue, I believe the only path forward is Alternative 2, collaborative state and federal management.

This is the only option that leads toward a functional commercial fishery in Cook Inlet. Under Alternative 3, the inherent challenges of federal-only management are likely to result in the partial or full closure of fishing in the EEZ, which is an essential part of the fishery and an access point for southern communities. NMFS clearly lacks the infrastructure and expertise to manage a salmon fishery in Alaska at this time, and it is difficult to envision a course in which the fishery remains open under Alternative 3. Alternative 4 closes it outright, which is similarly untenable.

The Council, the AP, the SSC and the Salmon FMP Committee, with consistent participation from state representatives, have spent the last 2 years reviewing considerations for Alternatives 2 and 3, and from my point of view as a participant in every single Council-related meeting addressing this issue, the clear emphasis has been on Alternative 2. Even where there is disagreement on fundamental components of program design, there is still widespread agreement that Alternative 2 is the right path. You see that reflected in the substantial emphatic public comments submitted under this item. This is one of the reasons that the inclusion of Alternative 4 at this late stage was such a surprise and a departure. Though perhaps it gives us an opportunity to look at the potential impacts of such a drastic change.

Not only would closure and grounds elimination be a troubling precedent for any salmon fishermen whose fishing areas span both state and federal waters, this action poses immediate and long-term harm to the community of Homer. The EEZ has historically provided a substantial portion of the harvest, with a large portion of the landings directed to Homer due to its southern proximity to the EEZ portion of the fishery. Closure would result in not just loss of fishing opportunity for the hundreds of captains and crew who live in Homer, it completely removes the incentive for vessels to operate out of Homer, as they have been doing for more than a century. Homer can expect to see 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 as more than 100 vessels are driven north — if they can still operate at all. The analysis does not review the full effect that such a drastic change would have on the community of Homer, or other communities that rely on this fishery.

I would also like to comment on the decision at the October meeting to add the language "commercial fishing" to all of the alternatives. The original Salmon Fishery Management Plan for the Western Area didn't include recreational fisheries, so it is perhaps superficially consistent for the

Council to focus the Alternatives for this action only on commercial fisheries. However, the execution of that, considering the options on the table, results in a drastic change to equity between sectors. This is because regardless of the alternative chosen, the state will still independently manage recreational fisheries in the EEZ.

If the Council chooses Alternative 4, it creates a profound inequity between commercial and recreational fishermen sharing this resource. It eliminates access for one, and maintains access for another, the allocative consequences and implications of which have not been analyzed.

This direction not only creates an inequity in access to the resource, just as importantly it eliminates commercial stakeholders from the public process that will still govern their neighbors in the recreational fishery. Going forward, recreational users would have the right to work with the State of Alaska and the Board of Fisheries as stakeholders in a public process determining the fishing future of the Cook Inlet EEZ. At the same time, commercial fishermen from the same communities that have a century-old history on these fishing grounds will be permanently excluded from that right, under the premise that the EEZ is under federal management. We cannot ignore that profound inequity, and the fact that it permanently awards public resource rights to one portion of a community and removes it for another.

Related to that concern, is that part of the challenge of finding a path forward on this issue has been the deeply contentious history between user groups who rely upon Cook Inlet. The political and allocative tensions in Cook Inlet are exhausting. That being said, we must remain collectively dedicated to improving our public processes and public discourse. Our solution to that contention cannot be eliminating an entire stakeholder group, at great cost to our coastal economies and cultures. That is the clear messages from our community leaders, marine business leaders, local residents and our fishermen.

Potential closure is an unacceptable outcome for the state of Alaska, which has long been committed to managing its salmon resources, and does so for the benefit of our coastal economies and food systems — of which Cook Inlet commercial fishing businesses are an integral part. State and federal laws require us to manage these resources for economic, cultural and ecological vitality. Options that have the potential to eliminate EEZ fishing opportunities do not accomplish that, and would decimate an already struggling commercial fishery. Recognizing that risk, it is vital that the Council choose a path forward that leads to a functioning fishery and a public process that can incorporate both state and federal waters, and all of Cook Inlet's stakeholders.

I urge the Council to choose Alternative 2.

Regards,
Hannah Heimbuch

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