



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue Suite 306
Anchorage, AK 99510
September 27, 2016
Re: Agenda Item B-1, EBFM Road Map & EBFM Road Map Comments

North Pacific Fisheries Association (NPFA) is headquartered in Homer, Alaska, and represents members and their families who fish along the coast of Alaska in both state and federal fisheries, harvesting halibut, salmon, black cod, pacific cod, rockfish, crab and herring -- from Dixon Entrance to Adak to St. Mathews Island. NPFA's members stand in support of sustaining healthy fishery resources as these abundant resources support our businesses and in turn the communities we call home.

NPFA has been following the development of ecosystem based fisheries management (EBFM) in Alaskan fisheries through the Council. As an approach to managing fisheries, we are in support of actively improving fisheries management as scientific data about the entire ecosystem where we harvest is produced, examined and presented before the Council for review. We applaud the Council's actions in creating the Aleutian Islands FEP and the ongoing development of the Bering Sea FEP.

Regarding the EBFM Road Map developed by NOAA, NPFA is concerned that the Road Map does not reconcile the term "resilient ecosystem" that is used throughout the document with the term "Optimum Yield" utilized within the Magnusen-Stevens Act. We would like to encourage the Council to also consider the importance of the economic and social impacts of sustainable fisheries on fishermen and the coastal communities of the North Pacific. NPFA finds these impacts equally vital components of a resilient ecosystem and believe that "Optimum Yield" should also be clearly integrated as part of EBFM.

We recognize that stock assessments and surveys are a vital component of fisheries management and the resources needed for these activities should not be diverted elsewhere, especially under strict time constraints as mentioned in Page 2 of NPFMC Executive Director Chris Oliver's comments submitted to NOAA.

Thank you for your consideration,


G Malcolm Milne

President, North Pacific Fisheries Association