

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



ESTIMATED TIME
6 HOURS
(all D-1 items)

DATE: January 25, 1999

SUBJECT: BSAI Chinook Salmon Bycatch

ACTION REQUIRED

Take final action on amendment to reduce BSAI chinook salmon bycatch.

BACKGROUND

The Magnuson-Stevens Act amendments emphasized the importance of bycatch effects on achieving sustainable fisheries. National Standard 9 mandates that conservation and management measures shall, to the extent practicable: (1) minimize bycatch; and (2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. To comply with these provisions of the Act, the Council highlighted the need for additional bycatch management measures during the 1997 call for proposals, and initiated development of several proposals received.

One proposal approved for analysis would lower the chinook salmon bycatch limits that trigger a closure of the Chinook Salmon Savings Areas in the Bering Sea. This proposal, submitted by the Yukon River Drainage Fisheries Association, identified that the current bycatch trigger of 48,000 chinook salmon is inadequate and does not reduce chinook salmon bycatch. Additionally, bycatch of chinook salmon after April 15 does not apply towards the PSC limit that triggers a closure.

In April 1998, the Council reviewed a draft analysis, and requested that the analysis be revised to include additional alternatives, including hotspot area closures at the start of the fishing year and an option that the closure would apply only to the pollock fishery. Further, the Council requested that the analysis discuss several issues, including a requirement for 100% observer coverage on vessels over 60' when fishing in the hotspot area, use of vessel monitoring systems on vessels fishing for pollock, accuracy of basket sampling for salmon, measures to ensure accurate enumeration of catch, and possible gear interactions resulting from a hotspot closure.

In October 1998, the Council reviewed a revised draft analysis and recommended several minor additions be incorporated into the analysis prior to public review. The revised analysis, which was released for public review on January 5, examines the following alternatives:

Alternative 1: No Action. Trawling is prohibited in the Chinook Salmon Savings Areas (CHSSA) through April 15 upon attainment of a bycatch limit of 48,000 chinook salmon in the BSAI.

Alternative 2: Include salmon taken after April 15 toward the bycatch limit of 48,000 chinook salmon. The Chinook Salmon Savings Areas would close upon attainment of the bycatch limit, whenever this would occur. Hence these areas could close, or remained closed, during the pollock 'B' season.

Alternative 3: Reduce the trigger level to 36,000 chinook salmon in the BSAI. Trawling would be prohibited in the Chinook Salmon Savings Areas through April 15 upon attainment of a bycatch limit of 36,000 chinook salmon in the BSAI.

Option 1 (applicable to Alternatives 2 and 3): Seasonally allocate the PSC limit, such that there are separate triggers for the pollock 'A' and 'B' season.

Option 2 (applicable to Alternatives 2 and 3): Begin accounting toward the PSC limit at the start of the 'B' season (currently September 1), with the amount carried over to the next pollock 'A' season.

Alternative 4: Annual closure of specific "hot spot" blocks. These specific blocks are the five contiguous blocks of the current Chinook Salmon Savings Area that in the vicinity of Unimak Island. These have been labeled in the document as 200, 201, 202, 227, 228, and 254. Block 201 has been further subdivided in half east to west and labeled as 997 (the eastern half) and 998 (the western half).

Option 1: Consider a seasonal closure of the selected blocks.

Option 2 (applicable to Alternative 4 and Option 1): The closure would only apply to the pollock fisheries although chinook salmon bycatch in all fisheries would apply toward a cap if in effect.

Alternative 5: Alternative 4 would be combined with Alternatives 1, 2, and 3. A cap would apply to closure of the "hot spot" blocks.

An executive summary of the analysis is attached as Item D-1(c)(1). Dave Ackley (ADF&G) will be on hand to discuss the results of his analysis.

Item D-1(c)(2) contains correspondence received on this subject.

Executive Summary

The Magnuson-Stevens Act amendments emphasized the importance of bycatch effects on achieving sustainable fisheries. National Standard 9 mandates that conservation and management measures shall, to the extent practicable: (1) minimize bycatch; and (2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch. This Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) addresses a proposal to minimize the incidental bycatch of chinook salmon in the groundfish trawl fisheries of the Bering Sea and Aleutian Islands. The following three alternatives were examined:

Alternative 1: No Action. Trawling is prohibited in the Chinook Salmon Savings Areas (CHSSA) through April 15 upon attainment of a bycatch limit of 48,000 chinook salmon in the BSAI.

Alternative 2: Include salmon taken after April 15 towards the bycatch limit of 48,000 chinook salmon. The Chinook Salmon Savings Areas would close upon attainment of the bycatch limit, whenever this would occur. Hence these areas could close, or remained closed, during other pollock seasons.

Alternative 3: Reduce the trigger level to 36,000 chinook salmon in the BSAI. Trawling would be prohibited in the Chinook Salmon Savings Areas through April 15 upon attainment of a bycatch limit of 36,000 chinook salmon in the BSAI.

Option 1 (applicable to Alternatives 2 and 3): Seasonally allocate the PSC limit, such that there are separate triggers for the pollock seasons.

Option 2 (applicable to Alternatives 2 and 3): Begin accounting towards the PSC limit at the start of the fall season (currently the September 1 'B' season), with the amount carried over to the next pollock 'A' season.

Alternative 4: Annual closure of specific "hot spot" blocks. These specific blocks are the five contiguous blocks of the current Chinook Salmon Savings Area that in the vicinity of Unimak Island. These have been labeled in the document as 200, 201, 202, 227, 228, and 254. Block 201 has been further subdivided in half east to west and labeled as 997 (the eastern half) and 998 (the western half).

Option 1: Consider a seasonal closure of the selected blocks.

Option 2 (applicable to Alternative 4 and Option 1): The closure would only apply to the pollock fisheries although chinook salmon bycaught in all fisheries would apply toward a cap if in effect.

Alternative 5: Alternative 4 would be combined with Alternatives 1, 2, and 3. A cap would apply to closure of the "hot spot" blocks.

Analysis of 1994-1997 observer data indicate that, regardless of season or year, the large majority of chinook salmon have been intercepted in the CHSSA. In the five years examined, the 48,000 cap was reached three times, and the 36,000 cap would have been reached in four of the five years. A 36,000 cap would have reduced the total number of chinook taken by 7% to 28% (3,000 to 18,000 salmon depending on the year and given low bycatch outside the CHSSA). In 1998, approximately 60,000 chinook were intercepted and both caps were exceeded.

An accounting year beginning September 1, as suggested by Option 2, would better agree with the biology of the salmon in the Bering Sea. This is because juvenile salmon (those primarily taken as bycatch) enter the Bering Sea to feed in the autumn and remain thought the winter, later moving to other areas in the summer. If Option

2 had been in place, the 48,000 chinook cap would have been reached in one of the five years (4 accounting years) examined. In the 1997-1998 accounting year, both the 36,000 cap and the 48,000 caps would have been reached 1/31/98 and 2/21/98, respectively. The potential cost of adopting Option 2 would be that chinook salmon taken in the 'B' season could impact the 'A' season by closing the CHSSA, an area that accounts for a relatively large portion of the 'A' season pollock catch. Most of the pollock catch has been taken from the CHSSA during the 'A' season, but in the 'B' season, most of the pollock catch comes from outside the CHSSA.

The analysis also indicated that the current CHSSA could be modified slightly. There tends to be high bycatch in the vicinity of the Pribilof Islands, but bycatch within specific blocks is not consistent. It appears from recent data that the two block area near the Pribilof Islands have not had high bycatch rates of chinook salmon. Hence, these two blocks could be removed from the CHSSA. Alternatively, additional blocks, one which is made up mostly of land on Unimak Island, showed consistently high bycatch of chinook salmon. Consideration should be given to adding this block, or perhaps other blocks, to the CHSSA.

A simulated closure of the various cells (Alternative 4) in different combinations caused variations in the bycatch patterns in the remaining open cells. In the pollock fisheries, with the exception of 1995 when few chinook salmon were bycaught, the closure of any combination of cells resulted in reductions in predicted chinook salmon bycatch, with greater reductions coincident with larger total area closures (more cells included in the closure). Closures of the areas generally caused reductions in the bycatch of herring, slight increases in the bycatch of halibut, moderate increases in chum salmon bycatch, and large increases in crab bycatch. The closure of the cells to all trawling further reduced the predicted levels of chinook salmon bycatch. However, because greater amount of effort is directed into open areas, the closures to all trawling greatly increased the percentage of crab bycatch of all species but generally reduced halibut bycatch levels.

Benefits of minimizing chinook salmon bycatch would accrue to those fishermen who target chinook salmon and sport and subsistence users of this resource. The most restrictive alternative (among the first three, or Alternative 3) would reduce total chinook bycatch in trawl fisheries by 3,000 - 18,000 salmon. It was estimated that the total benefits to western Alaska commercial salmon fishermen would be in the range of \$45,000 to \$272,000, but the benefits to subsistence and sport users have not been estimated. Simulation results estimated reductions in chinook bycatch of up to 50% by closing the six cells for the entire year. Options which were seasonal or of smaller total area reduced savings in chinook.

The costs associated with Alternatives 2 and 3 are due to potential forgone catch, reduced catch per unit effort (CPUE), and operational costs of moving. Fishermen try to fish in areas and ways they can maximize the returns on their capital; hence, forcing them to fish in non-optimal areas could result in lower CPUE and other costs. These costs could not be quantified in this analysis, but an analysis of CPUE in recent years predicted little change in the number of tows required to take the remaining catch outside of the closure areas. The simulation results indicated that if the closures were made to all trawling, increased crab bycatch would occur thus increasing bycatch costs.

There are several developments in 1998 which could have impacts on the analysis provided in this document. The proposed reductions through the American Fisheries Act in the size of the mothership fleet, the reallocation of pollock total allowable catch (TAC) among the mothership, catcher-processor and shoreside sectors of the fleet, and the proposed co-op nature of portions of the fleet will all change the patterns of effort for pollock in the Bering Sea. The recent Biological Opinion (Section 7 consultation) on the fishing related impacts on Steller sea lions could also cause far-reaching changes in the distribution of pollock fishing effort. The consultation identified areas of critical habitat for Steller sea lions, and the NPFMC has recommended actions to reduce the fishing effort for pollock within this critical habitat. The NPFMC also recommended spreading effort out in time so that "pulse" fishing periods are reduced. The recommended periods are as follows (1) A1, beginning January 20; (2) A2, beginning February 20; (3) B, beginning August 1; and (4) C, beginning September 15.

The analysis in this document is dependent on historical data to define the most effective measures in reducing chinook salmon bycatch. However, the changes discussed above will redistribute effort both spatially and temporally and the impacts these changes might have on chinook salmon bycatch are difficult to predict. The central blocks in the CHSSA are all located within the Stellar sea lion critical habitat, and movement of effort out of this area could be expected to reduce chinook salmon bycatch. Similarly, fishing effort in August would be unlikely to encounter chinook salmon (although chum salmon bycatch might be expected to be high), and would add to chinook salmon bycatch reductions. On the other hand, the beginning of the 'C' season on September 15 will likely increase the chances of chinook interceptions.

None of the alternatives are expected to have a significant impact on endangered, threatened, or candidate species, and none of the alternatives would affect takes of marine mammals. Actions taken to control chinook salmon bycatch in BSAI trawl fisheries will not alter the harvest of groundfish, but will reduce the incidental bycatch of juvenile chinook salmon.

None of the alternatives is expected to result in a "significant regulatory action" as defined in E.O. 12866.

None of the alternatives are likely to significantly affect the quality of the human environment, and the preparation of an environmental impact statement for the proposed action is not required by Section 102(2)(C) of the National Environmental Policy Act or its implementing regulations.



Alaska Marine Conservation Council

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January 27, 1999

Rick Lauber, Chair
North Pacific Fishery Management Council
605 W. 4th Ave.
Anchorage, AK 99501

RE: Agenda Item D-1-C, Final Action on Chinook Bycatch Reduction

Dear Chairman Lauber,

On behalf of our members throughout western Alaska to Southeast we urge the North Pacific Fishery Management Council to reduce chinook bycatch in the Bering Sea trawl fleet. In years past the foreign fleet wasted a tremendous number of chinook as bycatch. In 1980 alone it was over 110,000 fish. The North Pacific Fishery Management Council established a bycatch reduction schedule in the early 1980s and the annual chinook bycatch levels and rates came down dramatically. We believe the domestic fleet can achieve similar goals.

We appreciate the Council's efforts that established the chinook bycatch cap in 1995. However, we believe that was a starting point. The 48,000 cap is too high and the April 15 trigger for closing the chinook savings areas is not working effectively to control bycatch. AMCC supports a reduction in the cap to 36,000 and we believe the cap should be applied on a year round basis. We understand the new amendments to protect Steller sea lion habitat and the implementation of the American Fisheries Act will change the configuration of the Bering Sea pollock fishery and that there may be new locations where chinook bycatch could occur. These changes should not, however, delay the Council from taking action on the chinook bycatch problem. Indeed the pollock cooperatives offer new opportunities to fish more selectively. We believe this is an important way for the Council to continue down the path of minimizing bycatch as required by the 1996 Magnuson-Stevens Act.

Reducing chinook bycatch is important to people throughout coastal Alaska and along river systems who have economic and cultural reliance on salmon. Discussion about troubling changes in the ocean ecosystem is taking place between scientists and policy makers, within tribal organizations, local governments and fishermen's associations, and among friends and family members in their homes. There are many questions to answer about the nature of these changes and how we can lessen human-induced impacts on the ocean's ecological health. Reducing waste of king salmon, an important component of the marine ecosystem, is something over which the Council does have direct control. For all Alaskans, and especially those communities experiencing low salmon returns, we urge the Council to take strong action to reduce chinook bycatch at your February meeting.

Sincerely,

Dorothy Childers
Executive Director

**RECEIVED**

JAN 27 1999

N.P.F.M.C**United States Department of State*****Bureau of Oceans and International
Environmental and Scientific Affairs******Washington, D.C. 20520***

January 27, 1999

Mr. Richard B. Lauber
Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Lauber:

I am writing to comment on an item in the "Groundfish Management" section of the upcoming Council Agenda. I am writing in my capacity as U.S. negotiator for Yukon River salmon. As you recall, the United States and Canada were unable to conclude a long term agreement for the management of salmon runs on the Yukon River during the Pacific Salmon Treaty negotiations that ended in 1985. We have continued to negotiate since that time. A recent 3-year "interim agreement" lapsed on March 31, 1998. The two sides are currently exploring whether or not a basis for restarting the negotiations exists.

The Council must consider an overwhelming number of factors in management of the groundfish resource, and the industry and the managers are under pressure on many fronts. The following comments are offered in the hope that they will not add to your burden.

While Steller sea lion protection may be the conservation issue of the day, citizens of the villages along the Yukon River depend on the salmon resource. If relocation of the groundfish fishing effort results in interception of additional salmon, subsistence fishermen who have few alternative sources of food feel the affect. Please consider how little we know about where the chinook and chum salmon travel when they are in the marine phase of their life cycles.

The summer of 1998 will long be remembered on the Yukon as the summer the fish did not return. This makes it all the more important that our conservation regime take into account the needs of the people on the Yukon. The FAO Code of Conduct for Responsible Fisheries (Article 7 Management Measures, paragraph 6.9) provides guidance which

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may help the Council deal with this issue. It says, "When deciding on the use, conservation and management of fisheries resources, due recognition should be given, as appropriate, in accordance with the national laws and regulations, to the traditional practices, needs and interests of indigenous people and local fishing communities which are highly dependent on fishery resources for their livelihood."

If we expect Canadian interests to protect spawning habitat in the upper Yukon, we need to protect the salmon while they are at sea. The end of the large-scale, high seas driftnet fishery has helped. But this summer's fishery shows that other factors influence salmon returns.

Thank you for this opportunity to comment on measures to protect the chinook salmon resource. In time, perhaps we will know enough about the migratory patterns of salmon so that we can adjust the timing and locations of other fisheries to minimize salmon bycatch. Until then, please consider the needs of those along the Yukon who depend on these fish.

Sincerely yours,



H. Stetson Tinkham
Yukon River Salmon Negotiator
Office of Marine Conservation

Alaska State Legislature



State Capitol
Juneau AK
99801-1182

Official Business

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JAN 25 1999

N.P.F.M.C

January 22, 1999

Rick Lauber, Chair
North Pacific Fishery Management Council
605 W. 4th Ave.
Anchorage, AK 99501

Dear Chairman Lauber:

As the State Senator and State Representative for the area encompassing the majority of the Yukon and Kuskokwim (Y-K) Rivers and their associated river drainages, we are very concerned regarding bycatch of salmon of Y-K origin in the Bering Sea trawl fisheries. Recent years' salmon returns in the Y-K region have been extremely low, with 1998 resulting in a disaster declaration due to commercial and subsistence fishing closures imposed in most of the region. The 1998 return of chinook salmon to the Yukon River was the smallest recorded since statehood.

With the vital importance of chinook salmon to the residents of the Y-K region, it is critical that the NPFMC implement measures to minimize the bycatch. With several options before you at your February meeting, we ask you to adopt and implement a plan that significantly reduces and controls the chinook bycatch of all segments of the Bering Sea trawl fishery.

If we can be of assistance to you on this issue or other issues of mutual concern, please do not hesitate to contact us.

Sincerely,

Senator Georgianna Lincoln

Representative Carl Morgan

Alaska State Legislature

Member:
House Finance Committee

Legislative Budget Subcommittees:
University of Alaska
Natural Resources
Environmental Conservation



Representative John Davies
District 29

119 N. Cushman Street Suite 207
Fairbanks, Alaska 99701
(907) 456-8172
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E-mail: Representative_John_Davies@legis.state.ak.us

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FAX (907) 465-3519
1-800-928-4457

January 26, 1999

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

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JAN 27 1999
N.P.F.M.C.

Dear Council Members,

Please regard this letter as my written testimony to be included in the Council's meeting record regarding the Chinook Salmon bycatch regulations in the Bering Sea.

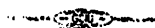
The report prepared by the Alaska Department of Fish and Game North Pacific Fishery Management Council, indicates several consequences that Alaska has already experienced and reasons why stronger regulations should be passed to reduce and control chinook bycatch in the Bering Sea trawl fishery.

First, the report estimates that approximately half of the bycaught chinook salmon in any given year would be expected to return to western Alaskan systems as adults had they not been intercepted.

Next, the report details that in 1998, approximately 60,000 chinook were intercepted in bycatch, exceeding the cap of 48,000 salmon. The report then states that approximately 20,000 adult chinook salmon have been removed from western Alaskan returns since 1993 due to bycatch.

Finally, due to the depletion, the Yukon River had its smallest chinook salmon return in history in 1998, and the escapement index for the Kuskowim River dropped to the lower levels seen in the mid-1980's. Incidents such as these resulted in a large portion of western Alaska being declared a disaster area.

The Magnuson-Stevens Act amendments recognized the importance of bycatch effect on achieving sustainable fisheries. National Standard 9 mandates that conservation and management measures shall, to the extent practicable: (1) minimize bycatch; and (2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.



The proposal before you includes 5 Alternatives to address the bycatch problem. From the alternatives provided in the report, I suggest using some variant of Alternative 5, which would grant staff maximum flexibility as they make decisions on how to control the bycatch of the chinook salmon.

This issue, as you know, can not be ignored. We cannot continue to allow fishing policies that contribute to the depletion of fish in the coastal waters. I commend you in your efforts to deal with this problem. Now, I urge you to adopt a resolution that provides stronger regulations to reduce and control chinook bycatch in the Bering Sea trawl fishery.

Sincerely,



Representative John Davies

**YUKON RIVER DRAINAGE FISHERIES ASSOCIATION**

733 WEST 4TH AVENUE SUITE 881 ANCHORAGE, ALASKA 99501 (907) 279-6519

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JAN 27 1999
N.P.F.M.C.

January 27, 1999

Two pages via fax# (907) 271-2817

Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Lauber and members of the Council:

The Yukon River Drainage Fisheries Association represents commercial, subsistence and sport fishermen within the Alaska portion of the Yukon River and its tributaries. As you know, in September 1997 we submitted the original proposal to reduce chinook salmon bycatch and we are glad to see that the Council has scheduled final action at your February meeting.

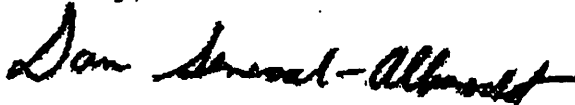
The YRDFA asks you to adopt Alternative 3, Option 1 to reduce the overall annual bycatch trigger level to 36,000 chinook but seasonally allocate the PSC trigger level so that there are separate triggers for the various pollock seasons. The Chinook Salmon Savings Area should also be expanded to include the 1/2 degree latitude by 1 degree longitude block that covers the central portion of Unimak Island and the waters off its northwestern coastline. (defined in the EA/RIR/IRF analysis as block 202). In addition, the Council should also consider a seasonal closure of one or more of the "hotspot blocks" defined in Alternative 4.

YRDFA would also like to reiterate that this proposal is not only about reducing bycatch of "western Alaska adult equivalents" as discussed in the analysis. As reported in Myers and Rogers (1988) central Alaskan and southeast Alaska/British Columbia chinook stocks comprised 17% and 9%, respectively of the bycatch during the 1979, 1981 and 1982 foreign and JV fisheries in the Bering Sea. The Central Alaska percentage includes chinook from the Karluk, Chignik, Susitna, Kenai and Copper Rivers. These other Alaskan and Canadian stocks are fully deserving of bycatch reduction measures as well and like western Alaska stocks are fully utilized by commercial, subsistence and sport users.

Rick Lauber, Chairman
North Pacific Fishery Management Council
January 27, 1999
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Finally, we would again urge the Council not to delay action on this item any longer. Some have argued that changes caused by the AFA and the Biological Opinion on Steller sea lions means that no action should be taken. That argument is a "red herring" and under its simplistic rationale the Council should throw out all regulations and start from scratch. The issue at hand is very simple and consists of first, selecting a bycatch trigger level and two, deciding which blocks comprise the chinook savings areas. That is the essence of the task before you, a task which is readily achievable by this Council.

Sincerely,



Dan Senecal-Albrecht, Executive Director
for co-chairmen, Harry Wilde, Sr. and Gilbert Huntington

cc: The Honorable Richard Daley, US Secretary of Commerce
Mr. Stetson Tinkham, Office of Marine Conservation, US State Dept.
Trevor McCabe, Office of Senator Stevens
Governor Tony Knowles
David Benton, Deputy Commissioner, ADF&G
Will Mayo, Tanana Chiefs Conference
David James, Council of Athabaskan Tribal Governments
Robert Beans, Kuigpagmiut, Inc.
Angela Morgan, Kuskokwim Native Association
Myron Naneng, Association of Village Council Presidents
Loretta Bullard, Kawerak, Inc.
Donald Nielsen, Bristol Bay Native Association
Larry Merculieff, Alaska Inter-Tribal Council
Phil Cutler, Alaska Sportfishing Association
Zeke Grader, Pacific Coast Federation of Fishermen's Associations
Gerry Couture, Yukon River Commercial Fishing Association, Dawson
Mr. Burt Hunt, Department of Fisheries & Oceans, Whitehorse
village councils of western Alaska
general public



Native Village of Unalakleet
P.O. Box 270, Unalakleet, AK 99684

Phone: 907-624-3622 Fax: 907-624-3402 Email: unakira@^{NOOK}alaska.net

TO: Rick Lauber, Chairman, NPFMC
Commissioner Frank Rus, ADF&G

FROM: Art C. Ivanoff

DATE: January 28, 1999

SUBJECT: by-catch of chinook salmon

The enclosed is resolution was faxed in on 1-26-99. Resolution 99-01-03 was adopted by the Unalakleet IRA Council. The resolution calls for a conservative approach in determining the cap on incidental take of chinook in the Bering Sea. We believe that the state and federal agencies have inconclusive evidence and therefore need to take the most conservative approach in determining by-catch of chinook.

The fact is by-catch of chinook by the Bering Sea Trawl fleet or False Pass interception of chum salmon is erroneous and corrupt! Conservation, escapement and subsistence needs should never take a back seat to money.

If you have any questions, please call our office. Thank you.

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JAN 27 1999
N.P.F.M.C

Native Village of Unalakleet
Council Meeting
Resolution 99-01-03

TITLE: Resolution calling for the immediate reduction in the by-catch of chinook by factory trawlers in the Bering Sea.

WHEREAS, The Native Village of Unalakleet is a federally recognized tribe, and

WHEREAS, the Native Village of Unalakleet is the governing body over tribal membership, and

WHEREAS, the North Pacific Fisheries Management Council is required by the Magnuson-Stevens Act to minimize by-catch, and

WHEREAS, the 1998 incidental take or by-catch of king salmon in the Bering Sea by Bering Sea trawl fisheries is estimated at 58,966, and

WHEREAS, tribal members of the Native Village of Unalakleet have sustained themselves for generations on the use of chinook for subsistence and recently have depended on chinook for commercial and recreational use, and

WHEREAS, the Alaska Department of Fish and Game and other federal agencies do not have solid data on the escapement of chinook up the Norton Sound, and

WHEREAS, without solid data the management of Norton Sound chinook for subsistence, commercial, and recreational use is unsound, and

WHEREAS, questions remain open as to whether chinook by-catch during the Bering Sea trawl season is negatively impacting the return of chinook up the Norton Sound, which is unfathomable, and

NOW THEREFORE BE IT RESOLVED: that the Native Village of Unalakleet is calling for the most conservative approach in authorizing the incidental take based on the need for solid scientific data on chinook escapements for the Norton Sound region, and

BE IT FURTHER RESOLVED: that the most conservative approach is essential until scientific data proves Bering Sea trawl fleet is not incidentally taking chinook destined for the Norton Sound, as current data is inconclusive, and

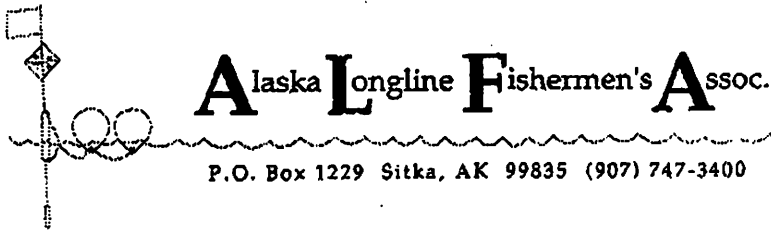
BE IT FURTHER RESOLVED: that the Native Village of Unalakleet requests the North Pacific Fishery Management Council to adopt the Yukon River Drainage Fisheries Association proposal with one friendly amendment which reduces the chinook by-catch from 48,000 to 20,000 per year.

CERTIFICATION

We hereby certify that this resolution was passed by the Unalakleet IRA Council on February 27th 1999 with a quorum duly established.


Fred Katchatag, Vice-President


Larry Ivanoff, Secretary



January 27, 1999

Chairman Richard Lauber
North Pacific Fishery Management Council
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501-2252

RECEIVED
JAN 27 1999
N.P.F.M.C.

Dear Chairman Lauber,

I am writing on behalf of our Association to urge you to reduce the Bering Sea chinook salmon trawl bycatch cap from 48,000 to 36,000 fish, and to apply the cap to the entire year.

As you may be aware, most of our members participate in salmon fisheries as trollers, seiners or packers. While Southeast stocks are not often taken as bycatch in the Bering Sea trawl fisheries, we are highly sympathetic to the effect of the Bering Sea bycatch on Western Alaska fishermen. Chinook salmon are important both economically and culturally to the people of Western Alaska. The poor runs in Bristol Bay during the past two seasons have heightened the importance of each fish, providing a compelling reason to further reduce Chinook bycatch.

Reducing the chinook salmon trawl bycatch cap would also respond to Congress' directive under the Sustainable Fisheries Act to "minimize bycatch. . . to the extent practicable." The request to reduce the Bering Sea chinook salmon bycatch cap was submitted to the Council in response to a direct request for proposals to reduce bycatch. The opportunity and responsibility to comply with Congress' directive is now up to the Council.

I understand that the American Fisheries Act (AFA) has brought changes to the Bering Sea trawl fisheries. These changes should not be used as an excuse not to act on the chinook salmon bycatch reduction issue. The AFA has allowed off-shore operators the opportunity to form fishing cooperatives, which they have always claimed would allow them to reduce bycatch. The AFA has also made all sectors of the pollock industry more profitable. These factors combined should make reducing the cap less onerous to the trawl industry. Juxtaposed against the Bristol Bay economic disaster, concerned voiced by the trawl industry regarding economic impacts are not convincing.

In closing, members of our Association urge the Council to take action at the February meeting to reduce the Bering Sea chinook salmon trawl bycatch cap from 48,000 to 36,000 fish, and to apply the cap throughout the year.

Thank you for the opportunity to comment.

Sincerely,

James Swift
(president, ALFA)

Kotlik Fisheries ProjectP. O. Box 20207
Kotlik, Alaska 99620Phone (907) 899-4060
Fax (907) 899-4528

January 26, 1999

Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252**RECEIVED**

JAN 26 1999

N.P.F.M.C

Dear Sirs:

As residents on the Yukon Delta, Kotlik Fishermen are dependent on strong returns of all the salmon species, especially king salmon. Commercial fishing is the only industrial income available to the Kotlik residents.

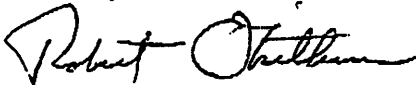
Most of our residents are in favor of lowering the king salmon bycatch by the Bering Sea trawl fishery from 48,000 kings to 36,000 kings. We ask that the trigger level for closure of the fishery be whenever 36,000 kings are caught.

We understand that the 48,000 bycatch trigger closure has not been in effect since passage in 1996, because the "B" season caught salmon were never counted. This is unfair to salmon fishermen along the coast and in the rivers. We should be given consideration for our fishery which has been established a lot longer than trawling.

Please lower the bycatch to 36,000 kings whether they are caught in the "A" season, "B" season or combination of both seasons.

Thank-you in advance of this consideration.

Sincerely,

Robert Okitkun,
Fisheries Planner/ Coordinatorcc: Kotlik City Council
Kotlik Traditional Council
Kotlik Yupik Corporation
Commissioner Frank Rue, ADF&G
file

AVCP

Association of Village Council Presidents
P.O. Box 219 • Bethel, Alaska 99559 • Phone 543-3521

January 25, 1999

Richard B. Lauber - Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED
JAN 26 1999
N.P.F.M.C.

Dear Mr. Lauber and fellow Council members,

The Association of Village Council Presidents, Inc. is the recognized tribal organization and non-profit Alaska Native regional corporation for its fifty-six member indigenous Native villages within Western Alaska. We are bound to support our member villages and act on their behalf in matters where it is deemed necessary. This is one of those times.

At our Thirty-Fourth Annual Convention held in Hooper Bay in October 1998, our delegation unanimously voted to support two resolutions concerning chinook salmon in the Yukon and Kuskokwim Rivers. These resolutions both relate to the decline in numbers of chinook salmon returning and the various closures that have been instated in the two rivers. A copy of each resolution (98-10-07 and 98-10-12) are enclosed for your reference.

We feel we have sacrificed all we can to ensure that our fish come back. -But, for the 2nd year in a row (3rd in the last 6 years) on the Kuskokwim and the 1st on the Yukon, fishery disasters were declared. As an Executive Board member has stated, we (the Kuskokwim River population) have "no leftovers" of chinook salmon for bycatch. The limited numbers that swim up our river go for escapement, subsistence uses, commercial harvests (when there is enough chum salmon to justify a commercial fishing opening), and sports fishing in all the tributaries as well as the main river.

Below are points to bear in mind when you take final action on the chinook bycatch issue this February in Anchorage:

1. Sacrifices have been made by in-river users, namely the Yukon River fishermen catching 60% less chinook than normal, allowing spawning goals to be met or falling just short.
2. Current regulations do nothing to reduce bycatch or act as effective incentives to avoid catching chinook salmon.
3. Kings on the Yukon are in trouble and have been returning in weak numbers on the Kuskokwim.

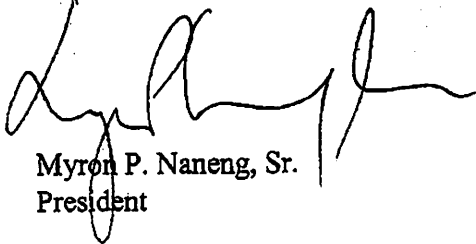
4. Trawler bycatch is not the main reason for the declining numbers of chinook but it is a factor we can control.
5. 60% of the chinook bycatch are juveniles originating in the Yukon, Kuskokwim and Bristol Bay River systems.
6. Because the population of chinook salmon in the Bering Sea is substantially smaller than that of chum salmon, the bycatch limit on them should also be significantly smaller. The present situation is not so.
7. The chinook bycatch limit should be in effect for the entire groundfish season from August through April. The present limit on only the A season doesn't effectively limit the bycatch nor protect chinook salmon.
8. To ensure the return of chinook salmon to our rivers, the number one necessity is that escapement needs must be met. The in-river users can try their hardest to accomplish this but if there are so little salmon entering the rivers to begin with, all actions taken are almost futile.

The chinook salmon is an essential and significant resource for all the river and coastal communities of our region and in most other regions of Alaska. It puts food on our table throughout the winter months. It puts money in our pockets for gas, electricity and other necessities. The chinook have also started a trend of returning in low numbers that we hope will discontinue for good. We've done our fair share to see they return. It is now past the time for the other parties involved, who are in part to blame, to carry the burden of conservation.

Sincerely,

The Association of Village Council Presidents, Inc.

Art Heckman, Chairman



Myron P. Naneng, Sr.
President

AVCP

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS
P.O. Box 219 • BETHEL, ALASKA 99559 • PHONE 543-3521

THIRTY-FOURTH ANNUAL CONVENTION
HOOPER BAY, ALASKA OCTOBER 6-8, 1998

RESOLUTION 98-10-07

REQUESTING RESEARCH INTO CAUSES OF WESTERN ALASKA SALMON DISASTERS


- WHEREAS The Association of Village Council Presidents, Inc. (AVCP) is the recognized tribal organization and non-profit Alaska Native regional corporation for its fifty-six member indigenous Native villages within Western Alaska and supports the endeavors of its member villages; and
- WHEREAS The Indigenous People of the Lower Yukon Villages are heavily dependent on and utilize the Chinook, coho, sockeye, fall chum and summer chum salmon for commercial and subsistence purposes; and
- WHEREAS Both the Alaska Department of Fish & Game and the Elders of the AVCP Region have noticed declining returns of salmon in the Yukon and Kuskokwim Rivers; and
- WHEREAS Western Alaska's river systems are experiencing a continued decline in fish stocks; and
- WHEREAS The State of Alaska Department of Fish & Game have instituted subsistence restriction on both the Yukon in 1998 and Kuskokwim Rivers in 1997; and
- WHEREAS The Alaska Department of Fish & Game closed commercial fishing opportunity for Chinook salmon on the Yukon River in 1998 and for fall chum in 1992, 1993, 1994, and in 1998; and
- WHEREAS Commercial salmon fishing is an important economic activity for the Native Villages; and
- WHEREAS The Alaska State and United States government have long ignored the need for more research on the life cycles of Western Alaska salmon;
- NOW THEREFORE BE IT RESOLVED THAT the State of Alaska and the United States Government allocate monetary resources for the research of Western Alaska salmon in the Yukon and Kuskokwim Rivers through its entire migratory route and its entire life cycle; and

BE IT FURTHER RESOLVED THAT the AVCP Natural Resources Department work, in unison with other Natural Resource Departments in Villages, with the Alaska Department of Fish & Game and other research organizations in obtaining the necessary monetary resources for the salmon research.

ADOPTED by the Association of Village Council Presidents, Inc. during the Thirty-Fourth Annual Convention at Hooper Bay, Alaska, this 8th day of October 1998 with a duly constituted quorum of delegates.

CERTIFIED:


Arthur S. Heckman, Chairman


Myron P. Naneng, Sr., President

AVCP

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS
P.O. BOX 219 • BETHEL, ALASKA 99559 • PHONE 543-3521

THIRTY-FOURTH ANNUAL CONVENTION
HOOPER BAY, ALASKA OCTOBER 6-8, 1998

RESOLUTION 98-10-12

ALASKA PENINSULA FALL CHUM SALMON INTERCEPT AND BERING SEA POLLOCK TRAWL FISHERIES

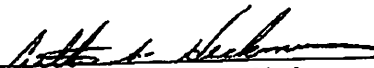
- WHEREAS The Association of Village Council Presidents, Inc. (AVCP) is the recognized tribal organization and non-profit Alaska Native regional corporation for its fifty-six member indigenous Native villages within Western Alaska and supports the endeavors of its member villages; and
- WHEREAS The AVCP Region Tribal Members are heavily dependent on and utilize the Chinook, Coho, Fall Chum and the Summer Chum Salmon, either for subsistence or commercial fishing; and
- WHEREAS The State of Alaska Department of Fish and Game have noticed the declining returns of the Yukon River Fall Chum returns since the late 1980's and the Yukon River Chinook returns in summer of 1998; and
- WHEREAS The State of Alaska Department of Fish and Game closed the commercial harvest of the Chinook in the summer of 1998, the Fall Chum fishery during the summers of 1992, 1993, 1994 and 1998; and
- WHEREAS The State of Alaska Department of Fish and Game imposed restrictions on the subsistence harvest of the Yukon River Chinook and the Fall Chum before implementing State law that closes all other fisheries before restricting the subsistence harvest of salmon; and
- WHEREAS Studies of the Alaska Peninsula Salmon Intercept Fisheries by the State of Alaska Department of Fish and Game have concluded that Yukon River Fall Chum and other Western Alaska bound chums are being intercepted on the Aleutian Chain; and
- WHEREAS Monitoring of the open-access to Bering Sea Pollock Trawl Fisheries by the National Marine Fisheries Service and North Pacific Management Council have indicated that large amounts of Chinook and other Salmon species have been caught as bycatch of which their origins are unknown; and

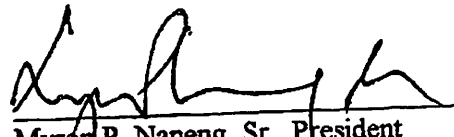
WHEREAS it is known that the CDQ Pelagic Fisheries is the cleanest fisheries with the minimum by-catch of Salmon and of limited duration; and

WHEREAS The State of Alaska has not imposed restrictions as specifically stated in the State Fisheries Management Policy, where it closes all other users before closing the subsistence take of Salmon only to the extent that the Yukon River Commercial Fisheries was closed;

NOW THEREFORE BE IT RESOLVED THAT The Association of Village Council Presidents file a petition or motion with the U.S. Department of Interior, the U.S. Department of Commerce and the State of Alaska Department of Fish and Game to implement or impose a MORATORIUM in the Aleutian Chain and the open-access Bering Sea and Aleutian Islands mid-water pollock trawl fisheries until the salmon return to their historic levels along the Yukon and Kuskokwim Rivers and other Western Alaska rivers and their tributaries.

ADOPTED by the Association of Village Council Presidents, Inc. during the Thirty-Fourth Annual Convention at Hooper Bay, Alaska, this 8th day of October 1998 with a duly constituted quorum of delegates.


Arthur S. Heckman, Chairman


Myron P. Naneng, Sr., President



KAWERAK, INC.

P.O. BOX 948 • NOME, ALASKA 99762

TELEPHONE: (907) 443-5231 • FAX: (907) 443-3708

SERVING THE VILLAGES OF:

- BREVIK MISSION
- COUNCIL
- DIOMEDE
- ELIJAH
- GAMBELL
- GOLOVIN
- KING ISLAND
- KOYUK
- MARY'S IGLOO
- NOME
- SAVOONGA
- SHAKTOOLIK
- SHISHMAREF
- SOLOMON
- STEBBINS
- ST. MICHAEL
- TELLER
- UNALAKLEET
- WALES
- WHITE MOUNTAIN

Resolution 98-15

A RESOLUTION ADVOCATING FOR THE REDUCTION OF CHINOOK SALMON BYCATCH IN THE BERING SEA/ALEUTIAN ISLANDS TRAWL FISHERY.

WHEREAS, Kawerak, Inc. represents the villages of the Norton Sound, Bering Strait Region and

WHEREAS, Residents of these villages rely heavily on Chinook (king) salmon for subsistence and commercial uses; and

WHEREAS, Bycatch and waste of Chinook (king) salmon in the Bering Sea/Aleutian Islands pollock trawl fishery negatively impacts subsistence and commercial uses of Chinook salmon in the Norton Sound/Bering Strait Region and hampers the ability of managers to provide for sustained yield of these critically important salmon stocks; and

WHEREAS, Current Federal regulations have proven to be inadequate in acting as a disincentive to reduce or control Chinook salmon bycatch in the Bering Sea/Aleutian Islands trawl fishery.

NOW THEREFORE BE IT RESOLVED,

That the Board of Directors of Kawerak Inc. strongly urges the North Pacific Fishery Management Council to adopt Alternative 3, Option 2 at its upcoming February 1999 meeting to reduce the bycatch trigger level to 36,000 Chinook salmon and begin accounting towards this trigger limit with the start of the "B" season with the amount carried over to the start of the next "A" season.


Robert Keith, Chairman

CERTIFICATION

I, the undersigned Secretary of Kawerak, Inc. hereby certify that the foregoing resolution was adopted by majority vote of the Board of Directors of Kawerak, Inc. at a duly called and noticed meeting on December 17, 1998, and that a quorum was present.

ATTEST:


Mary D. Charles, Secretary

RECEIVED

JAN 26 1999

Tatlinik

Eyak

Chugach
Sawara

N.P.F.M.C

Nunagpet

Chugachmiut Environmental Protection Consortium

4201 Tudor Centre Drive, Suite 210, Anchorage, Alaska 99508 (907) 562-4155 • Fax (907) 563-2891

NUNAGPET/CHUGACHMIUT ENVIRONMENTAL PROTECTION CONSORTIUM RESOLUTION NO. 98-03

A NUNAGPET/CHUGACHMIUT ENVIRONMENTAL PROTECTION CONSORTIUM RESOLUTION REQUESTING THE REDUCTION OF CHINOOK BY-CATCH IN THE BERING SEA.

- WHEREAS,** Nunagpet/CEPC includes representatives of federally recognized tribes in the Chugach region in south central Alaska; and
- WHEREAS,** Nunagpet/CEPC is a tribal organization designed to facilitate the development of tribal environmental health and protection programs,
- WHEREAS,** The Coastal Villages and Communities in Alaska depend heavily on Chinook and other salmon for subsistence and commercial fisheries; and
- WHEREAS,** A portion of Chinooks taken in the Bering Sea are attributed to other river systems from Chignik to the Copper River; and
- WHEREAS,** The North Pacific Fisheries Management Council (NPFMC) is considering a proposal by the Yukon River Drainage Fisheries Association to reduce the Bering Sea Chinook by-catch cap from a 48,000 Chinook cap in a four and a half month window from January 1st to April 15th; and
- WHEREAS,** The Yukon River Drainage Fisheries Association is offering a proposal to reduce the by-catch of Chinook to 36,000 through out the year; and
- WHEREAS,** Governor Knowles of Alaska has declared a fisheries disaster for Bristol Bay, Kuskokwim and Yukon River areas in both 1997 and 1998; and
- WHEREAS,** 48,000 - plus Chinook are being permitted to be killed and wasted as by-catch in the Bering Sea Trawl fisheries every year; and
- WHEREAS,** The trawl fisheries can be managed to reduce this by-catch and still harvest their quota of target species of ground fish

THEREFORE, BE IT RESOLVED THAT,
Nunagpet/CEPC hereby request the NPFMC to adopt the Yukon River Drainage Fisheries Association proposal to reduce the Bering Sea Chinook by-catch from 48,000 to 36,000 (or other numbers approaching zero) Chinook per year.

PASSED AND ADOPTED, this 8th day of December, 1998 at a duly convened meeting of the Nunagpet/Chugachmiut Environmental Protection Consortium.

SIGNED:


Glenn Ujioka, Chairperson

Dear Sirs

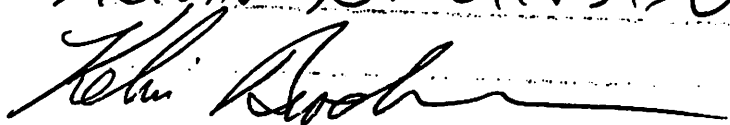
1-20-99
Kelvin Brodersen
1912 Kestrel Ln.
FSKs AK 99709-6257

I have fished commercially for Yukon River King Salmon since 1978. This fishery has traditionally been the healthiest sustained salmon run in Alaska - until now!

I believe that the decreasing Yukon King stocks is directly related to the increasing bycatch by the Bearing Sea Trawl Fishery.

Please protect the Juvenile Yukon River King salmon from these wasteful factory trawlers, by closing the areas known for King salmon bycatch.

Thank you,

Sincerely,
Kelvin Brodersen


Cordova District Fishermen United

Celebrating 65 Years of Service to Commercial Fishermen in Cordova, Alaska
P.O. Box 939 Cordova, Alaska 99574 / Telephone (907) 424-3447 / Fax (907) 424-3430

January 25, 1999

Rick Lauber, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

SENT VIA FACSIMILE TO (907) 271-2817

Re: Bering Sea Pollock B season

Dear Chairman Lauber and Council Members:

Cordova District Fishermen United (CDFU) is the oldest fishing organization in the State. We represent Area E salmon, herring and other fishermen. Our stated mission is to "preserve and protect Area E fisheries and to promote safety at sea." In keeping with our stated mission, CDFU is writing in opposition to the August 1 opening date of the Bering Sea Pollock B season due to the ramifications of that season on our pink salmon fishery.

The processing capacity in Prince William Sound represented by Bering Sea pollock vessels has become increasingly important in our fishery. Elimination of this critical component of processing capacity will result in millions of pink salmon being left unharvested in the Sound. While we fully recognize the necessity of dealing with the Stellar sea lion decline, we sincerely urge the Council's full and complete examination of any and all alternatives to the August 1 start date. The decisions made by the Council and others regarding the pollock fisheries obviously have impacts and ramifications to other fisheries must be taken into consideration.

We thank you for your thoughtful deliberation of this issue.

Respectfully,



Sue Aspelund
Executive Director

cc: Governor Tony Knowles

RECEIVED
JAN 25 1999
N.P.F.M.C.

RECEIVED

JAN 21 1999

N.P.F.M.C

Fax#(907)271-2817

January 19, 1999

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Re: February 1999 Meeting - NPFMC
Reduction of Western Alaskan King Salmon Bycatch

Chairman Lauber:

Please accept this letter, as my written testimony, before the North Pacific Fishery Management Council's for the February 1999 meeting.

Distinguished members of this important Council, my name is Milford Douglas Sweat. I am a limited entry commercial salmon fisherman from the middle Yukon River.

The 1998 salmon fishing season was, without doubt, the worst in recorded history. Not one single salmon was commercially harvested in the middle Yukon River, in 1998. While others may complain about reduced harvests levels, none can claim the degree of hardships, that no fishing has brought to my area of the State.

Looking at the geographic and historic area of my village, located on the Yukon River; it was perhaps the first sighting of this river, by the first people to come to North America. Resting beside this mighty river, with clear streams filled with salmon; it could be reasonably assumed, that they harvested food for their families. Indeed, one of the native names for Kaltag, "is a place to fish".

Fishermen, from all along the Yukon, have grown to know the balance of Nature. These same fishermen have joined their common interest, AND, with the expertise of state and federal managers, have strived to insure adequate spawning escapement, as the first order of priority.

Turning to the year 1998; the reported bycatch of king salmon in the Bering Sea trawl fishery, exceeded the total directed commercial harvest of king salmon in all the Yukon River fishing districts, combined. It is little wonder that Yukon River fishermen have little or no fish to harvest. But, like all other fisheries around the world, that have suffered from over exploitation; the writing is on the wall, everyone will suffer

from depleted stocks, that WILL result in extreme conservation measures imposed to rehabilitate a vanishing resource.

Several issues of notable consideration that are subject for review:

- 1.) Who has the priority rights of use?
 - a.) Historical and lawfully entitled harvesters, OR
 - b.) New and unlawful interceptors?

- 2.) Is escapement objectives and replacement of the "renewable" resource being achieved?

- 3.) What measures have been enacted for conservation purposes, AND, are these measures sufficient?

- A.) The clear and obvious answer to part One, is;

THE LAWFUL HARVESTER

- B.) The answer to part Two, is;

NO. Escapement has suffered, and an unfair burden of conservation has been placed on the rightful harvester.

- C.) Which leads to the answer to part Three, which is;

The conservation measures enacted, todate, have subordinated the rightful harvester, to the unlawful interceptor. AND, even these measures of TOTAL closure ON THE RIGHTFUL HARVESTER, for conservation concerns, are insufficient.

It could be reasonably argued that; the reverse role of burden of conservation, with subordinated priority of harvest, be placed on the upstart interception bycatch fishery, well before any measure of conservation be placed on the historical and lawful fishery.

With that in mind;

REDUCING THE LEVEL OF HARVEST FOR A COMBINED TOTAL OF 36,000 KING SALMON IN BOTH THE "A" AND "B" FISHERIES, AND, COMPLETELY CLOSING OF THE "HOT SPOT" BLOCKS.

may be overly generous. The Alternative could be that everyone WILL BE faced with feeding their families with the level of harvest that was forced on the middle Yukon River in 1998.

Mr. Chairman, that concludes my written testimony. I realize the difficult decision that is now before the North Pacific Fishery Management Council. And, I also appreciate the need to correct the problem(s) of excessive exploitation of Western Alaskan king salmon, before we are ALL faced with a much larger problem.

Respectfully,

Milford D. Sweat
Milford D. Sweat

cc: Frank Rue, Commissioner, Alaska Department of Fish & Game

P.O. Box 2617
Homer, Alaska 99603
January 18, 1999

RECEIVED

JAN 21 1999

Rick Lauber
Chair, North Pacific Fishery Management Council
605 West Fourth Avenue
Anchorage, Alaska 99501

N.P.F.M.C

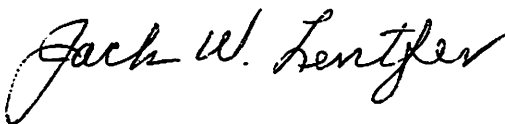
Dear Mr. Lauber:

I am writing to express concern about the excessive chinook (king) salmon bycatch in the Bering Sea. Information that I have indicates a bycatch of about 63,000 fish in 1996 and 50,000 fish in 1997, primarily from cod and pollock trawl fisheries. King salmon are an important subsistence, commercial, and recreational resource and should not be wasted as bycatch. Additional protection is also needed because spawning numbers have been low in some streams the past two years.

Methods used to try to control this bycatch are not working and should be improved. The Magnuson-Stevens Act requires that fishery managers minimize bycatch through more selective fishing practices. One option is to reduce the bycatch cap to 36,000 fish and hold this cap on a year-round basis.

I urge the North Pacific Fishery Management Council to do an in-depth assessment and then take measures to significantly reduce this bycatch at its February meeting.

Sincerely,



Jack W. Lentfer

Post-it Fax Note 7672

No. of Pages: 1 Today's Date: 1-21-99 Time: 3:38 P.M.

To: Rick Lauber, Chairman
 Company: North Pacific Fishery Management Council
 Location: Anchorage
 Fax #: (907) 271-2812
 Telephone #: [blank]

From: Martin P. Okitkun
 Company: Kotlik Yupik Corp.
 Location: Kotlik, Alaska
 Fax #: (907) 899-4528
 Telephone #: (907) 899-4014

Original Disposition: Destroy Return Call for pickup

Mailing the original to you

RECEIVED
JAN 21 1999
N.P.F.M.C

Kotlik Yupik Corporation

P.O. Box 20207
Kotlik, AK. 99620-0207

Telephone: (907) 899-4014
Fax (907) 899-4528

Resolution 99-02
RESOLUTION REGARDING
WESTERN ALASKA KING SALMON

Whereas, the Yukon bound King Salmon are important to the economic well-being of the Kotlik residents and,

Whereas, All of the salmon species are vital for subsistence use, and

Whereas, There are more than 70 residents in Kotlik who have Yukon commercial salmon permits, and

Whereas, The businesses and governments of the community are dependent on good salmon harvests,

Now Therefore, Be It Resolved, That the North Pacific Fishery Management Council adopt stronger measures to reduce and control bycatch of king salmon in the Bering Sea trawl fishery, and

Be It Further Resolved, That NPFMC lower the bycatch from 48,000 to 36,000 kings with the trigger level for closure whenever 36,000 kings are caught, be it during the "A" season, "B" season or combination of both.

Passed and approved this 20 day of January, 1999 by a vote of 4 for and none against.

Joseph P. Mike
Joseph P. Mike, Chair

Martin P. Okitkun
attest: Martin P. Okitkun, General Manager

Alaska Tribal Govt

200 PALUKAN AVE
P.O. Box 48
St. Mary's, Alaska 99586
Telephone (907) 458-2832/2933
Fax (907) 458-2227

RECEIVED
JAN 21 1999
N.P.F.M.C.

January 14, 1999

Rick Lauber, Chairman
North Pacific Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501-2252

Re: Interception of Western Alaska bound Chinook.

Dear Mr. Lauber:

The Alyaq Tribal Council and the Council would like to express their concern about a matter that affects directly to our way of life.

St. Mary's is located about 55 miles up from the mouth of the Yukon River and its economy is depended on the healthy return of the Summer Chum, Fall Chum, Coho and especially the Yukon River Chinook. We are not part of the CDD program and do not see any benefit from this congressional action. Alyaq Tribal Government is one of two Tribal organizations here in St. Mary's and we represent 388 members of whom many are subsistence and commercial fishermen.

Since about 1977 the fishermen from the Lower Yukon River have been cooperating with the Alaska Department of Fish and Game in reducing fishing time and harvest quotas in hopes that the salmon species on the Yukon would rebound to there historic levels. To date our sacrifices have been for nothing!! We have been pleading with the State of Alaska to reduce the intercept quota for the Fall Chum and have stopped fishing for the summer chum, now we are pleading with the Federal Government to help in reducing the devastation of our most important salmon stock, the Chinook Salmon. This one species of Salmon is the livelihood of the residents of the State of Alaska and Canada that live along side the more than one thousand mile of river.

We are asking that: (1) there be observers on all pollock trawl ships to monitor this fishery that has one thing in mind and that is "make 4 billion dollars no matter what the cost." (2) When determining a intercept quota, it be for the whole fleet for that year not an A or B season because at present no matter what the scientists are saying this fishery is affecting the whole Bering Sea Eco-system.

Please excuse us for being so bold but with what is happening, we have no other place to turn to but wait on your decision

Sincerely,

John B. Thompson Sr.
President, Alyaq Tribal Council

Co. Gov. Tony Knowles

Commissioner Frank Rye

Algaaciq Tribal Government**P.O. Box 48****St. Mary's, Alaska 99658****Phone (907) 438-2932/2933****Fax (907) 438-2227****Resolution 98-07****Title: Alaska Peninsula Fall Chum Salmon Intercept and Bering Sea Pollack Trawl Fisheries**

- Whereas;** The Algaaciq Tribal Government is a federally recognized tribal organization that has a tribal membership of 270 Yup'iks from the Lower Yukon River; and
- Whereas;** The Algaaciq Tribal Members are heavily dependent on and utilize the Chinook, Coho, Fall Chum and the Summer Chum Salmon, either for subsistence or commercial fishing; and
- Whereas;** The State of Alaska Department of Fish and Game have noticed the declining returns of the Yukon River Fall Chum returns since the late 1980's and the Yukon River Chinook returns in summer of 1998; and
- Whereas;** The State of Alaska Department of Fish and Game closed the commercial harvest of the Chinook in the summer of 1998, the Fall Chum fishery during the summers of 1992, 1993, 1994 and 1998; and
- Whereas;** The State of Alaska Department of Fish and Game imposed restrictions on the subsistence harvest of the Yukon River Chinook and the Fall Chum before implementing State law that closes all other fisheries before restricting the subsistence harvest of salmon; and
- Whereas;** Studies of the Alaska Peninsula Salmon Intercept Fisheries by the State of Alaska Department of Fish and Game have concluded that Yukon River Fall Chum and other Western Alaska bound chums are being caught as bycatch; and
- Whereas;** Monitoring of the Bering Sea Pollack Trawl Fisheries by the State of Alaska Department of Fish and Game have indicated that large amounts of Chinook and other Salmon species have been caught as bycatch of which their origins are unknown; and

Whereas; The State of Alaska has not imposed restriction as specifically stated in the State Fisheries Management Policy, where it closes all other users before closing the subsistence take of Salmon only to the extent that the Yukon River Commercial Fisheries was closed,

Now Therefore Be It Resolved, that the Algaaciq Tribal Members through the Algaaciq Tribal Council requests to the Association of Village Council Presidents (AVCP) and its delegates, that they file a petition or motion to the U.S. Department of Interior, the U.S. Department of Commerce and the State of Alaska Department of Fish and Game to implement or impose a MORATORIUM on all off shore salmon intercept fisheries and all other fisheries that catch salmon as bycatch until the salmon returns to the Yukon River and all other Western Alaska Rivers rebuild to their historic levels.

CERTIFICATION

PASSED ON THIS 29th DAY OF Sept., 1998 AT A DULY CONVENED MEETING OF THE ALGAACIQ TRIBAL COUNCIL, BY A VOTE OF 3 FOR AND 0 AGAINST

John B. Thompson Sr.
John B. Thompson Sr. President

Norbert Beans
Norbert Beans Secretary

Bristol Bay Driftnetters' Association

PO BOX 21951 • JUNEAU, AK 99802

RECEIVED
JAN 21 1999
N.P.F.M.C

North Pacific Fisheries Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501

Dear NPFMC Members;

We appreciate your deliberations to reduce Chinook interception in the Bering Sea. We are very concerned about the escalating interception as born out in NMFS reports and our actual observations in Bristol Bay. In fact our Members have experienced very rapidly dwindling Chinook catches in the Bay, especially in the East Side districts of the Naknek/Kvichak, Egegik and Ugashik river systems.

I attended a meeting of the Bering Sea skippers some years ago at the North Pacific Fishing Vessel Owners' Association office and was impressed by the serious and constructive attitude of those in attendance even though the proposed bycatch limits were not eventually implemented. The skippers said that some vessels were not as careful in managing their bycatch as others. They also said the worst Chinook intercept took place, I believe, on the early morning tows around the 100-fathom line.

We urge you to adopt a meaningful alternative, which keeps interception at least below 36,000 fish. We believe your efforts should include a confidential survey of observers to determine any possible problem areas for effective and accurate reporting.

We believe Chinook bycatch reduction by the trawl fleet is essential to healthy run survival. We need your help in establishing the best Alternative and monitoring it's effectiveness to preserve healthy stocks and to prevent our salmon stocks from dwindling further. Bristol Bay Driftnetters' Association urges you to adopt appropriate regulations at your upcoming February Meeting.

Sincerely,

Dan

Dan Barr
President
Bristol Bay Driftnetters' Association

RECEIVED
JAN 22 1999
N.P.F.M.C

NATIVE VILLAGE OF EYAK TRIBAL COUNCIL
RESOLUTION 99-1-22

A RESOLUTION REQUESTING THE REDUCTION OF CHINOOK BY-CATCH IN THE BERING SEA.

WHEREAS, The Native Village of Eyak Traditional Council is the governing body of the Native Village of Eyak; and
WHEREAS, The North Pacific Fisheries Management Council (NPFMC) is considering a proposal by the Yukon River Drainage Fisheries Association to reduce the Bering Sea Chinook by-catch cap from a 48,000 Chinook cap in a four and a half month window from January 1st to April 15th; and
WHEREAS, The Yukon River Drainage Fisheries Association is offering a proposal to reduce the by-catch of Chinook to 36,000 through out the year; and
WHEREAS, The Coastal Villages and Communities in Alaska depend heavily on chinook and other salmon for subsistence and commercial fisheries; and
WHEREAS, Governor Knowles of Alaska has declared a fisheries disaster for Bristol Bay, Kuskokwim and Yukon River areas in both 1997 and 1998; and
WHEREAS, A portion of the chinooks taken in the Bering Sea are attributed to other river systems from Chignik to the Copper River; and
WHEREAS, 48,000 plus chinook are being permitted to be killed and wasted as by-catch in the Bering Sea Trawl fisheries every year; and
WHEREAS, The trawl fisheries can be managed to reduced this by-catch and still harvest their quota of target species of ground fish
THEREFORE BE IT RESOLVED THAT, The Native Village of Eyak hereby request the NPFMC to adopt the Yukon River Drainage Fisheries Association proposal to reduce the Bering Sea Chinook by-catch from 48,000 to 36,000 (or other numbers approaching zero) chinook per year.

Passed and Adopted this 22nd day of January, 1999 at a duly convened meeting of the Traditional Council with 5 voting in favor, 0 voting against and 0 abstaining.

Marlena Fonzi
Marlena Fonzi, sec./treas.

1/22/99
Date

ATTESTED: *John Mark Hoover*
1-22-99

**RECEIVED**
JAN 25 1999**Alaska Sportfishing Association**

P. O. Box 24-1847

Anchorage, AK 99524-1847

North Pacific Fishery Management Council
605 West 4th Ave Suite 306
Anchorage, AK 99501
via Fax

Dear Chairman Lauber,
The Alaska Sportfishing Association, Alaska's largest sport fishing group, would like to express its opinion about the BSAI King Salmon bycatch issue being discussed at your February 1999 session.

I know we can dispense with the formalities of referencing the applicable sections of the Magnuson-Stevens Act and National Standard 9. We have all heard about them countless times. So lets look the issue in the eye. The trawl fisheries in the BSAI area need to be more concerned and take a much more active role in significantly reducing King Salmon bycatch.

Having reviewed the many alternates your staff have placed on the table, we feel that the one that best works the problem (of those offered) is Alternative 3. This alternate would reduce the bycatch limit from 48K to 36K. We suggest that the bycatch limit be allocated to each of the four pollock seasons based on the relative TAC of each season.

We also would like to impart a caution here. We have a real need to find out where these salmon originated. We therefore request that the origin of the fish be identified and quantified by either CWT (coded wire tags) of hatchery raised fish or DNA or other means for wild salmon. Our concern is that some of these fish may be from a river system whose runs have been declared threatened or endangered. The pollock fishery is just too important to the industry and to the world's hungry to be impacted by the ESA or International Salmon treaties.

Thank You

Phil Cutler, President

**ALAKANUK CITY COUNCIL
PO BOX 167
ALAKANUK, ALASKA 99554
PHONE (907) 238-3313
FAX (907) 238-3620**

**RECEIVED
JAN 20 1999
N.P.F.M.C**

January 20, 1999

Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Re: Bycatch of Western Alaska King Salmon

Dear Mr. Lauber:

We are writing to you to take into consideration the upcoming meeting scheduled for February 1-6, on a proposal to reduce the bycatch of king (chinook) salmon bycatch by factory trawlers and shore-based trawlers in the Bering Sea pollock and cod fisheries.

We are concerned, for our fishery here on the Yukon, will be diminished if a stronger measures are not adopted to reduce and control bycatch of king salmon in the Bering Sea trawl fishery. We've already experienced poor fishing during the king salmon season for the last two years.

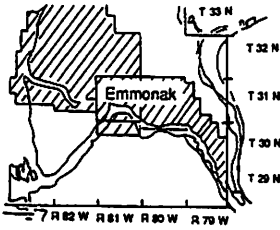
Should you have any questions, please do not hesitate to give me a call. Thank you.

Sincerely,

Raymond J. Oney
Raymond J. Oney
City Administrator

Cc: City Council

Post-It [®] Fax Note	7671	Date	1-20-99	# of pages	1
To	Rick Lauber	From	City of AUK		
Co./Dept.	NPFMC	Co.	Ray Oney		
Phone #		Phone #	(907) 238-3313		
Fax #	(907) 271-2817	Fax #	(907) 238-3620		



EMMONAK CORPORATION

P.O. BOX 49
LOWERYUKON RIVER
EMMONAK, ALASKA 99581
MAIN OFFICE: (907) 949-1129

STORE: (907) 949-1349
TANKFARM: (907) 949-1531
MARINA: (907) 949-1328
FAX NO: (907) 949-1412

99-01-11-01
RESOLUTION ~~99-01-11-01~~

RECEIVED
JAN 19 1999
N.P.M.C.

RESOLUTION IN SUPPORT OF REDUCING CHINOOK, KING SALMON BYCATCH IN THE BERING SEA

WHEREAS: The Commercial Fisheries for the Chinook Salmon has been a healthy fisheries for forty plus years in the Yukon River

WHEREAS: the 1998 Commercial Season for the Chinook Salmon was a total failure due to poor returns of Chinook Salmon

WHEREAS: The Department of Fish and Game predicted an average to above average return, which did not materialize

WHEREAS: The current mechanism to control Chinook bycatch does not work and there is no effective incentive for the trawl fleet to avoid catching Chinook Salmon

WHEREAS: The Commercial Fisheries for the Chinook Salmon is so important for the Fisherman of Districts 1 and 2 of the Yukon River

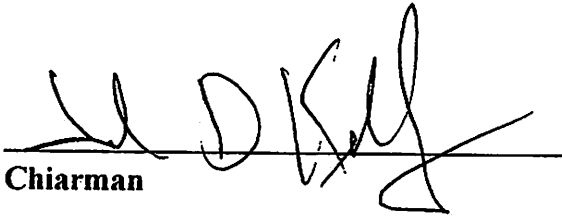
WHEREAS: The results of this Fisheries is the only cash source for most of the residents have to do there subsistence gathering for the whole year

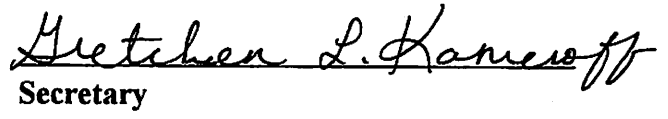
WHEREAS: The 1998 season was declared a Disaster by the State of Alaska

THEREFORE BE IT RESOLVED; Emmonak Corporation supports and urge the North Pacific Management Council to reduce the Chinook bycatch in the Bering Sea Cod and Polluck Trawl Fisheries.

Adopted at a lawfully called meeting of the Emmonak Corporation Board of Directors at which a quorum was present by a vote of 7 in Favor and 0 Against.

ATTEST:


Chairman


Secretary

Nancy Lord
P. O. Box 558
Homer, Alaska 99603

(907) 235-8252 phone
(907) 235-8253 fax
nlord@xyz.net

Jan. 14, 1999

Rick Lauber, Chair
NPFMC
605 W. 4th Ave.
Anchorage, AK 99501

RECEIVED

JAN 19 1999

N.P.F.M.C

RE: Bering Sea chinook bycatch

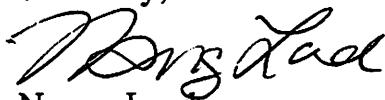
Dear Mr. Lauber,

I'm writing to urge the Council to reduce chinook bycatch in the Bering Sea.

As a salmon fisherman (Cook Inlet), conservationist, and Alaskan concerned about the waste of bycatch in general, I believe that in this case you have a clear opportunity (and mandate) to comply with the Magnuson-Stevens Act by reducing bycatch through more selective fishing practices. Regardless of what other changes are made in the management of Bering Sea fisheries, this one problem needs to be addressed with a reduction in the chinook bycatch cap; the cap, moreover, needs to be applied to the entire year. Chinook bycatch is simply too high and must be reduced--both because that's the right thing to do to protect the fisheries that so many coastal communities depend upon and because it's the law. The trawl fleet can surely do better in avoiding chinook bycatch, if you give them a meaningful cap and hold them to it.

Thank you for your attention to this important matter.

Sincerely,



Nancy Lord

Box 1088
Tahlequah, OK 74464

1/8/99

Mr. Rick Barber, Chair
North Pacific Fisheries
Management Council,

Dear Mr. Barber, I would like to support strongly
the amendment proposed by
the Yukon River Drainage Fisheries
Association to reduce the king
salmon bycatch in the Bering
Sea project and cod fishery.
Specifically lowering the king
bycatch from 48,000 to 30,000
kings in season "A" and
making some fishing
bycatch center during the
pollot "B" season.

This is an important management
tool, particularly as the
season B is longer now and
that is the exact time when
34 year old juvenile kings are
entering the Bering Sea.
We believe this amendment
will help the king salmon
fisheries and people like myself
who earn a living from the
fishery.

R. H. Kong FV 511206

RECEIVED
JAN 14 1999
APR 16

KUIGPAGMIUT, Inc.

P.O. Box 32209 • Mt. Village, Alaska 99632 • 800-930-2834 or (907) 591-2834 • Fax: (907) 591-2109

January 12, 1999

Rick Lauber
Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

RECEIVED
JAN 15 1999

N.P.F.M.C

Dear Rick:

Kuigpagmiut, Inc. represents the four villages of Mt. Village, Marshall, Andreafski, and Pitkas Point. Our villagers rely on Chinook salmon each year for both subsistence and economic purposes. This letter is written in relation to the upcoming Fishery Council meeting to decide on actions toward the Bering Sea Trawl Fishery.

First, I would like to start off with a question. If the bycatch has been set at 48,000 fish, how did the fishery go way over the quota in two of the past three years? It is estimated that 60 percent of the Chinook bycatch is fish bound for the Yukon River. The past two fishing seasons here on the Yukon have been very bad for our people. During the 1998 season, for example, the Y-1 district had three openings and the Y-2 district had two openings for the entire Chinook season. Lack of fish the reason for the early closures of these districts. Money earned from fishing is used to support living expenses for the remainder of the year. Also, subsistence fishing was very poor for Chinook salmon during the 1998 season.

The best option of all the alternatives is to reduce the bycatch below its current level. Alternative 3 is to reduce the level to 36,000 Chinook salmon. This, however, in my belief is still too high of a bycatch. Alternative 5, would also be of some benefit if it was to combine a reduced bycatch with closed areas and a carry-over of the bycatch to the next fishery. Ideally, the most benefit would come to us if more fish were allowed to return to the Yukon River. In the past ten years of documented bycatches, there were two years of acceptable bycatch levels. 1990 had a bycatch of 13,990 fish and 1995 had a bycatch of 23,097. These levels are very low in comparison to the

Rick Lauber
Page 2
January 12, 1999

other eight years, and I only hope the data to support these two years is accurate and representative of the whole Bering Sea trawl fishery bycatch.

I hope this is taken into consideration when the time for a decision comes. Our four villages are very dependent on Chinook salmon, as are the numerous other villages located on Yukon River, and the coastal areas of the delta. Aren't our Alaskans more important than foreign owned, lower-48 based fishing vessels? Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Reeves", with a long horizontal flourish extending to the right.

Jeff Reeves
Natural Resources Director

January 10, 1999

Rick Lauber, Chair
NPFMC
605 W. 4th Avenue
Anchorage, AK 99501

RECEIVED

JAN 13 1999

N.P.F.M.C

Dear Mr. Lauber:

I would like to address two items on the agenda for the February 1999 meeting.

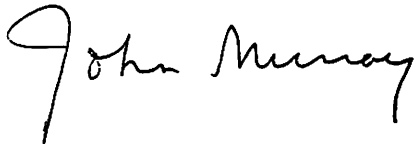
First, I believe the Council should do more to see that the Chinook salmon by-catch is reduced. Chinook salmon are, as you know, important commercially and for subsistence to many, especially those persons in Western Alaska. It is important for the well being of those residence to reduce by-catch.

I believe the catch could be minimized through more selective commercial fishing practices, specifically trawling in the Bering Sea. This should help more spawners to return to some of the systems which are also experiencing declines. Are current incentives to reduce by-catch on Chinook working? If they are not, changes should be made.

Secondly, here are some comments regarding the proposal of "full retention of demersal shelf rock fish" by longliners fishing IFQ's. I support the proposal. It makes sense so we can fully see the impact of longlining on the rock fish resource.

I personally brought in all my rock fish in 1998. I did not receive anything for my overage but I believed it was important for managers to know what is really happening on the grounds. The proposal would force longliners to adjust fishing areas if they did not want to catch so many rock fish. I do not see this as a hardship on the fleet in the long run. The fleet will adjust to more selective fishing techniques, and the rock fish resource will be more protected from over fishing and wastage.

Sincerely,



John L. Murray
F/V Greta
224 Observatory Street,
Sitka, AK 99835
907-747-6212

RECEIVED

JAN 12 1999

January 9, 1999

N.P.F.M.C

To the North Pacific Fisheries Management Council:

I am writing to express my concern for the health of Alaska's Bering Sea fisheries and the coastal communities that depend on Bering Sea chinook.

I encourage you to take stronger measures than are now in place to reduce and minimize bycatch, a waste of our resources and a threat to the health of fisheries and marine habitat. We must find ways to encourage, and if necessary force, the fishing industry to fish less wastefully to avoid the disasters suffered in other parts of the U.S.

I encourage you to reduce the present level of bycatch allowed for Chinook salmon and establish strong incentives for the trawl fleet to avoid catching them at all. If that cannot be achieved, I think we should question whether trawling should be allowed at all, or whether we should turn to less destructive ways to feed our people and support our economy.

Sincerely,

Marjorie C. Hermans

MARJORIE C. HERMANS

9630 Moaine Way

Juneau, AK 99801

Jan. 12, 1999

RECEIVED

JAN 12 1999

N.P.F.M.C

To: North Pacific Fishery Management Council
From: Erik Weingarh
Box 74
St. Marys Alaska 99658
(Lower Yukon River Fisherman and Subsistence User)

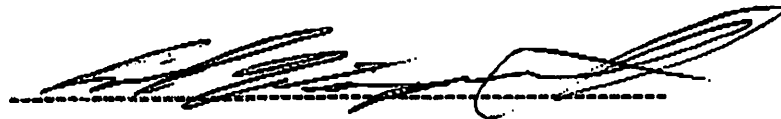
Re: Feb, 1-6 1999 Meeting / Control Bycatch of king salmon and all other salmon in
the Bering Sea Trawl Fishery.

Dear Council,

Thank-you for giving me a chance to express my view on the Bycatch matter involving Western Alaska Salmon that have been taken in the Bering sea and Aleutian Trawl Fishery. As you are all aware Western Alaska has had poor returns over the years of various salmon stocks. We need to inforce the proposal made by the Yukon River Drainage Fisheries Assoc. made in Sept. 1997. Reduce the bycatch to 36,000 kings in all Pollock Fisheries. We need to also be sure that we are in control of the bycatch and waste of all juvenile salmon. These reductions are in the best interest of all Fisherman. The sooner we protect our salmon stocks the easier it will be to rebuild them. The past 3 seasons of salmon bycatch in the Bering Sea Trawl Fisheries are not acceptable. A more strict approach must be made.

Thank-You !!!!!

Erik Weingarh



CHEFORNAK TRADITIONAL COUNCIL
PO BOX 110
CHEFORNAK ALASKA 99561
(907) 867-8502 FAX (907) 867-8711

RECEIVED
JAN 11 1999
N.P.F.M.C

TO: Rick Lauber, Chair
North Pacific Management Council
605 W. 4th Avenue
Anchorage, Alaska 99501

Re: Letter of Support for Reducing Chinook Salmon Bycatch in the Bering Sea

The Chefornek Traditional Council is in full support for Reducing Chinook (King Salmon) Bycatch in the Bering Sea, and as AI-TC said in the letter that Chinook Salmon is a vitally important resource for many Alaskan Coastal communities of the Bering Sea and the Gulf of Alaska for subsistence and commercial use.

We the people of Chefornek support North Pacific Management Council of urging to reduce Chinook Salmon Bycatch in the Bering Sea, because 48,000 Chinooks are being permitted to be killed and wasted as Bycatch in the Bering Sea, and most Coastal Villages of the Bering Sea and villages of the Yukon and Kuskokwim rivers depend on Chinook Salmon for commercial and subsistence use; and Governor Tony Knowles of Alaska has declared a fishing disaster for Bristol Bay, Kuskokwim and Yukon River areas in both 1997 and 1998, and there is problem that needs to be solved.


Alexie Flynn, President

CC:
CTC file
AI-TC

January 5, 1999

RECEIVED

JAN - 8 1999

N.P.F.M.C

Rich Lauber, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue
Anchorage, AK 99501

Dear Mr. Lauber:

I am a sports fisherman who fishes for chinook salmon in the Cook Inlet every summer. I have been fishing the Inlet since 1973 and have seen the numbers of spawner kings decline significantly over the years.

One of the reasons for the decline, I believe, is the bycatch of chinook in the Gulf of Alaska and the Bering Sea by the trawler fleet.

Presently, the bycatch quota allowed between January and April 15 is 48,000 chinook. That is not a realistic amount since that number is never reached by 15 April. As a result, the fleet continues to catch chinook by catch throughout the remainder of the year.

The chinook is a very important resource for me, my friends and neighbors, as well as for subsistence and commercial users. The numbers are down and this is no time to be wasting a resource that may be in trouble. Let us not allow the Gulf of Alaska, Bering Sea and other local waters to become like the North Atlantic.

The Magnuson-Stevens Act requires that fishery managers minimize bycatch through more selective fishing practices. Let us reduce bycatch and save our chinook salmon from depletion.

Sincerely,



George E. Smallwood III
P. O. Box 3371 -
Homer, Alaska 99603-3371

Cc: Alaska Marine Conservation Council

TUNTUTULIAK TRADITIONAL COUNCIL

P.O. Box 8086
TUNTUTULIAK, ALASKA 99680

(907) 256-2128

Resolution NO. 98-12-09

FAX MEMO
 PAGES 1 DATE 1/6 FAX# 907-256-281
 TO Rick Loukas
 FROM [Signature]
 CC
 FILE # 2080

Reducing Chinook (King Salmon) by catch in the Bering Sea

WHEREAS, The Tuntutuliak Traditional Council is a federally-recognized tribal governing body for the First Nation Village of Tuntutuliak and;

WHEREAS, The Tuntutuliak Traditional Council is a tribal entity organized for the purpose of providing a variety of services to the residents of the First Nation Village of Tuntutuliak and;

WHEREAS, The Tuntutuliak Traditional Council has learned that the Chinook Salmon originating from the Kuskokwim area is wasted as by catch in the Bering Sea and;

WHEREAS, The residents of the First Nation Village of Tuntutuliak rely heavily on the Chinook Salmon for their subsistence commercial and recreational use and;

WHEREAS, the cod and pollock travel fisheries in the Bering Sea have caught Chinook Salmon as by catch and therefore wasted and;

WHEREAS, the travel fleet is currently allowed to catch 48,000 Chinook between January 1 and April 15 and;

WHEREAS, The problem is that the fleet almost never reaches the 48,000 Chinook by catch cap by April 15 and;

WHEREAS, The fleet continues to catch Chinook by catch throughout the rest of the year with no constraints at all.

WHEREAS, The current mechanism to control Chinook by catch does not work and;

NOW, THEREFORE, BE IT RESOLVED, that the North Pacific Management Council reduce Chinook by catch by the cod and pollock travel fisheries in the Bering Sea and;

BE IT FURTHER RESOLVED, that the North Pacific Management Council reduce the Chinook by catch cap to 36,000 fish and hold the fleet on this on a year round basis.

Duly adopted this 29th day of Dec. 1998, at a meeting held by the Tuntutuliak Traditional Council, a quorum being present by a vote of 5 ayes and 0 nays.


Nick Frank -President


Phillip Charlie Jr. -Sec./Treas.

1. Bycatch of Chinook (and all salmon species) should be based upon a highly conservative percentage of the estimated salmon return to BSA; G04 river systems as determined by the Alaska Department of Fish and Game. Travelers should only receive a very small percentage of this return, since their bycatch is wasted completely!
- * 2. I have 3 suggestions for management of the known "Hotspot" areas:
 - a. Chinook hotspots managed for

This letter regards the Chinook bycatch problem in the travel fisheries of the Bering Sea. I would like you and your colleagues to take measures to protect all salmon species from becoming bycatch in the travel fisheries not only in the Bering Sea, but the Gulf of Alaska. Chinook, chum, all salmon species are the heritage of all peoples in Alaska - to allow the waste of these species is wrong, criminal, & negligent. I must agree with some points made by my husband, the most important are listed first.

Dear Mr. Lawler,

Anchorage, AK 99501

605 W. 4th Ave

Rick Lawler

North Pacific Fishery Management Council

RECEIVED
JAN - 7 1999
N.P.F.M.C.

(907) 486-3737

Kodiak, AK 99615

P.O. Box 1903

Susan Payne

this conservative percentage of optimum return until April 15 and then closed regardless of whether the cap has been reached.

- b. Close the Chinook hotspots to all trawling!
- c. Close the hotspot area to trawling Jan 1 - April 15!

All ~~these~~ these options would be conservative management for healthy Chinook returns. And would adhere to the intent of the Magnuson-Stevens Act which requires you to "minimize bycatch through more selective fishing practices". Abstinence in this case is selective!

3. Include "other" salmon species w/ Chinook in the cap on bycatch. Like my husband I have spent time in the Bering Sea and have seen more Chum salmon caught than Chinook salmon.

To close, please drastically reduce the Chinook salmon, all salmon bycatch in the trawl fisheries. Set limits (absolute) on bycatch do not reflect the variability in return. Salmon returns in the Bering Sea are reflecting some disturbance in the environment and should be given all the help possible. And finally, waste of any species is intolerable and should not be allowed regardless of the political pressure (\$) to continue.

Thank you.

Sincerely, Susan Payne

Rick Lauber, Chair
North Pacific Fishery Management Council

RECEIVED
JAN - 7 1999

Dec. 20 '98

Don Doman
P.O. Box 1723
Kodiak Ak 99615

To Rick Lauber,

N.P.F.M.C

I am writing regarding the Chinook bycatch problem in the trawl fisheries of the Bering Sea. I would like to see 3 changes in the way salmon bycatch in the trawl fishery is currently handled.

1) Since there are 3 areas known to be 'hotspots' for chinook - it seems to me those areas should be closed to trawling during the months of the year when they are most likely (king salmon) to be in those areas.

2) Chum bycatch should be included as an area of concern in the trawl fishery. In my years working on a trawler in the Bering Sea in the late 80's, we caught far more chum than chinook.

3) Yearly quotas or limits on chum & chinook bycatch should reflect projected returns to Western Alaska rivers. A yearly quota of 48,000 fish for example may be insignificant on a strong return, but substantially too many fish when returns are weak as they are presently. Virtually all the commercial salmon fisheries of Alaska are managed to insure a viable spawning population even if it means closing a fishery to protect stocks. I don't see why the trawl fishery should be treated any differently.

As you are well aware, bycatch in the trawl fishery is a serious problem that must be dealt with effectively. If you do nothing to reduce salmon bycatch, the short term gains to the trawl fleet will be at the expense of long

terms serious depletion of western Alaska chum & chin
salmon stocks and the history they support.

Thank you - Sincerely,

Don S. Dunbar

P.S. I have been a commercial Fisherman
for 20 years and worked on draggers from
1987 - 92. I finally quit dragging in the
fall of '92 because of the incredible waste. We
spent too much time shoveling unwanted bycatch
overboard - 50-70% of our tows went over the
side including halibut & salmon which were not
included in bycatch reports.

Franklin D. Waldron
P. O. Box 39093
Ninilchik, Alaska
99639
December 18, 1998

RECEIVED

DEC 23 1998

N.P.F.M.C

North Pacific Management Council:

I am concerned with the bycatch of king salmon by the trawling industry in the Bering Sea. I feel this bycatch should be limited to the historic level of 10,000 king salmon per year. This level was attained by the foreign trawl fleet in the past and represents a realistic goal. I support Alternative 3 (voted at October meeting) as a first step towards this goal. As a lifelong Alaskan and Bristol Bay commercial salmon fisherman I have a direct interest in these stocks. I also have family living on the upper Yukon River whose subsistence and personal use of these king salmon was drastically affected this year by the king salmon shortage. This shortage was in a year when over 60,000 juvenile kings were taken by the trawl fishery. This huge bycatch year after year is effecting our subsistence users in interior Alaska who need protection from this council. If necessary we must close whole areas to trawling in order to protect this historicly important resource.

Respectfully,

Franklin D. Waldron

December 26, 1998

Rick Kauber, Chair

NPFMC

605 W. 4th Street
Anchorage, AK 99501

Dear Mr. Kauber -

As an Alaskan concerned about our marine resources, I urge the NPFMC to take measures to reduce chumok bycatch in the Bering Sea. The current level of chumok bycatch is unacceptably high, especially in trawl fisheries. In addition, the Magnuson-Stevens Act requires you to minimize bycatch.

Thank you very much for your attention to this important matter.

Sincerely,

Gardner Knold

1760 Baronet

Eagle River AK 99577

RECEIVED
DEC 29 1998
N.P.F.M.C.

RESOLUTION 98-35

RECEIVED
NOV 2 1998
NPFMC

**A RESOLUTION REQUESTING THE REDUCTION OF CHINOOK BY-CATCH
IN THE TRAWL FISHERIES IN THE BERING SEA.**

WHEREAS, The Newtok Traditional Council is the Tribal Governing body of the Native Village of Newtok; and

WHEREAS, The North Pacific Fisheries Management Council (NPFMC) is Considering a proposal by the Yukon River Drainage Fisheries Association to reduce the Bering Sea Chinook by-catch cap from 48,000 to 36,000 Chinooks per year; and

WHEREAS, Coastal villages of the Bering Sea and villages of the Yukon and Kuskokwim Rivers depend heavily on Chinook salmon for subsistence and commercial fisheries; and

WHEREAS, Governor Tony Knowles of Alaska has declared a fishing disaster Bristol Bay, Kuskokwim and Yukon River areas in both 1997 and 1998; and

WHEREAS, 48,000 Chinooks are being permitted to be killed and wasted as by-catch in Bering Sea Trawl fisheries every year; and

WHEREAS, Many of the Chinook salmon killed and wasted as by-catch are bound for these areas declared to be a disaster; and

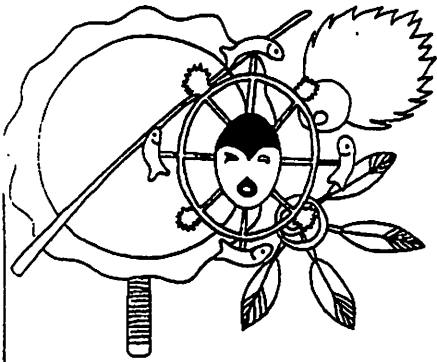
WHEREAS, The trawl fisheries can be managed to reduce this by-catch and still Harvest their quotas of target species of ground fish; and

SO, THEREFORE, BE IT RESOLVED THAT the Newtok Traditional Council hereby requests the NPFMC to adopt the Yukon River Drainage Fisheries Association proposal to reduce the Bering Sea Chinook by-catch from 48,000 to 36,000 chinooks per year.

PASSED AND ADOPTED this 17 day of November, 1998 at the duly called meeting of the Council with ___ voting in favor, ___ voting against and ___ absent on the measure.


President

ATTEST: 
Secretary



Nunakauyak Traditional Council
of
THE NUNAKAUYARMIUT

RECEIVED

NOV 18 1998

RESOLUTION NO. 98-11-003

N.P.F.M.C

TITLE: A RESOLUTION REQUESTING THE REDUCTION OF CHINOOK BY-CATCH IN THE TRAWL FISHERIES IN THE BERING SEA.

WHEREAS, The Nunakauyak Traditional Council is the Tribal governing body of the Native Village of Toksook Bay; and

WHEREAS, The North Pacific Fisheries Management Council (NPFMC) is considering a proposal by the Yukon River Drainage Fisheries Association to reduce the Bering Sea Chinook by-catch cap from 48,000 to 36,000 chinooks per year; and

WHEREAS, Coastal villages of the Bering Sea and villages of the Yukon and Kuskokwim Rivers depend heavily on chinook salmon for subsistence and commercial fisheries; and

WHEREAS, Governor Tony Knowles of Alaska has declared a fishing disaster for Bristol Bay, Kuskokwim and Yukon River areas in both 1997 and 1998; and

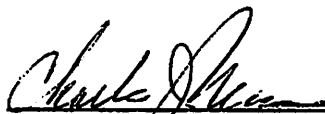
WHEREAS, 48,000 chinooks are being permitted to be killed and wasted as by-catch in Bering Sea Trawl fisheries every year; and

WHEREAS, Many of the Chinook salmon killed and wasted as by-catch are bound for these areas declared to be a disaster; and


WHEREAS, The trawl fisheries can be managed to reduce this by-catch and still harvest their quotas of target species of ground fish; and

SO, THEREFORE, BE IT RESOLVED THAT the Nunakauyak Traditional Council (formerly Toksook Bay Traditional Council) hereby requests the NPFMC to adopt the Yukon River Drainage Fisheries Association proposal to reduce the Bering Sea Chinook by-catch from 48,000 to 36,000 chinooks per year.

PASSED AND ADOPTED this 10th day of November, 1998 at the duly called meeting of the Council with 6 voting in favor, 0 voting against and 1 absent on the measure.


Charles J. Moses, President

ATTESTED BY:


David B. Tim, Secretary

Scott Highleyman
2220 38th Street
Bellingham, WA 98226

tel. 360/715-0063 fax: 715-0072
e-mail: <highleyman@pacifnrm.com>

RECEIVED

DEC 14 1998

N.P.F.M.C

December 7, 1998

Rick Lauber, Chair
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK 99501

Dear Rick,

I am writing to urge the North Pacific Council to support the Yukon River Drainage Fisheries Association proposal to reduce chinook salmon bycatch in the Bering Sea. The current bycatch controls are clearly not working -- the 36,000 salmon trigger is not fired by April 15th yet the total over the course of the year can climb to very high levels, up to 78,000 in 1996 and 63,000 in 1997. Clearly, it was not the intent of the Council to set up a bycatch control program that provides no controls! It's time to go back to the drawing boards and come up with a new plan that really does reduce and control chinook bycatch.

The proposal before you would establish a bycatch cap of 36,000 chinook. This makes sense, is simple, would achieve real reductions, and puts the pollock fleet on notice of exactly what's expected of them. As you know, chinook salmon is a resource relied upon not just by another commercial fleet, but even more importantly by the coastal communities in the Bering Sea for spiritual sustenance and cultural subsistence. Moving to the Northwest from Alaska has made me even more conscious of the importance of salmon to Alaska's Native and non-Native culture. Please do your part to prevent the kind of degradation of salmon that we suffer with here.

Finally, the NPFMC is clearly required by the Magnuson-Stevens Act to minimize bycatch where practicable. You are presented with a workable, simple proposal. I hope you'll follow the law and your own conscience to adopt the proposal to reduce chinook bycatch.

Thanks for considering my views and good luck during your meeting.

Sincerely,


Scott Highleyman

PATTI J. SAUNDERS
1233 W. Eleventh Ave.
Anchorage, AK 99501
(907) 278-9308

RECEIVED
DEC 14 1998
N.P.F.M.C

December 10, 1998

North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

To the Council:

I am a commercial fisherman. I have lived in Alaska since 1986. Over the years, I have become increasingly concerned about the waste associated with groundfishing in the Bering Sea and Gulf of Alaska. As a salmon fisherman and a coastal resident, I am quite certain that this bycatch adversely affects my life, my livelihood and the environment.

While I applaud the Magnuson Fishery Conservation and Management Act's efforts to remove foreign fleets from American waters, I believe that we've simply replaced one problem with another by financing and otherwise supporting the explosive growth of an American fleet that over harvests these same waters.

I urge you to take immediate action to minimize bycatch in groundfish fisheries. Please do not fall into the trap of studying this problem to death in the search for "conclusive" scientific evidence. There is sufficient evidence now for any reasonable human being to conclude that there is a problem, the ecosystem is suffering, and the people who rely on the oceans for food and livelihoods are suffering. Please help now.

Please consider the following ideas:

- an incentive program to reward "clean" fishermen who reduce bycatch with a larger quota
- increasing allocations to the cleaner gear types
- increased budget for the observer program
- reduced allowances for bycatch of salmon, halibut, herring and crab
- restrictions on "dirty" gear types in the most productive and/or most sensitive habitats

We've known for years that bycatch is a problem. The decline in the Stellar sea lion population has reached alarming proportions. I have heard that certain sea birds and sea otter populations are also plummeting. How much longer will we wait to do something definitive? Coastal residents, including me, are counting on you to act now.

Very truly yours,

Patti J. Saunders

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DEC 14 1998

N.P.F.M.C

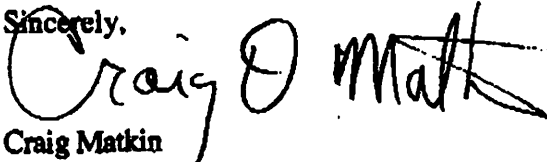
Rick Lauber, Chair
North Pacific Fisheries Management Council
605 W. 4th Ave.
Anchorage, Alaska 99501

December 11, 1998

Dear Mr. Lauber,

As a long time commercial fisherman and contract biologist, the issue of king salmon bycatch is of concern to me on several accounts. We are seeing reduced king salmon returns in many systems around the North Pacific and increased desirability and economic importance of this species for sport fishermen from British Columbia through Homer, Alaska. In addition, these salmon are an important food for killer whales in British Columbia and probably in Alaska. The killer whale watching business is expanding dramatically, even in our own Kenai Fjords region. Also, we are all well aware of the desirability of these fish to the commercial fisherman. In short, the importance of king salmon from an ecological as well as an economic viewpoint cannot be overstated. The excessive bycatch of this species (63,231 fish in 1997) is not only painful but foolishly short-sighted. At the very least, a cap of 36,000 king salmon caught as bycatch annually should be put in place. As it now stands there is little incentive for the trawl fleet to significantly reduce chinook bycatch.

Sincerely,



Craig Matkin

SOUND FISHERIES
Paul McCollum, Owner/Biologist/Consultant
 PO Box 2016, Homer, Alaska 99603
 Phone/Fax: 907 235-0588 email: paulam@ptialaska.net



December 10, 1998

Rick Lauber, Chair
North Pacific Fishery Management Council
605 W. 4th Ave.
Anchorage, AK 99510

RECEIVED
DEC 14 1998
N.P.F.M.C

Dear Mr. Lauber,

I am writing to strongly urge the North Pacific Fishery Management Council take action to significantly reduce the levels of Chinook bycatch in the Bering Sea. The present cap of 48,000 between January 1st and April 15th is ineffective as after that there is no further limitation. This present "cap" in actuality is not facilitating any reduction in Chinook bycatch as the fleet does not reach the 48,000 level until after the April 15th date and then there are no further restrictions and the catch goes exceeds the so called cap and has no further control.

It is my belief that the adopting a real cap of allowable bycatch to 36,000 Chinook and hold this in effect for the entire fishery for that year. I believe this is one of the options proposed by the Yukon River Drainage Fisheries Association and I fully support this or any other bycatch reductions that would not allow the fishery to extract any more than a maximum of 36,000 Chinook in any one year fishery. This is the only way to start getting the bycatch reduced and bring some form of realistic Chinook bycatch control within the trawl fishery.

Thank you for considering this very important matter. I realize that many fisheries under your jurisdiction are getting more and more complex given the sea lion situation and many other concerns. This however, in my opinion, is one of the more straightforward issues that can be quickly remedied by instituting the above mentioned more effective Chinook bycatch cap.

Sincerely,

Paul A. McCollum
Paul A. McCollum

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DEC 14 1998

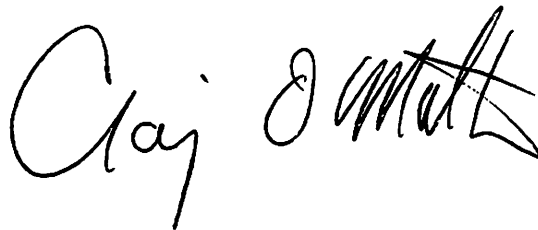
N.P.F.M.C

Rick Lauber, Chair
North Pacific Fisheries Management Council
605 W. 4th Ave.
Anchorage, Alaska 99501

December 11, 1998

Dear Mr. Lauber,

As a long time commercial fisherman and contract biologist, the issue of king salmon bycatch is of concern to me on several accounts. We are seeing reduced king salmon returns in many systems around the North Pacific and increased desirability and economic importance of this species for sport fishermen from British Columbia through Homer, Alaska. In addition, these salmon are an important food for killer whales in British Columbia and possibly in Alaska. The killer whale watching business is expanding dramatically, even in our own Kenai Fjords region. Also, we are all well aware of the desirability of these fish to the commercial fisherman. In short, the importance of king salmon from an ecological as well as an economic viewpoint cannot be overstated. The excessive bycatch of this species (63,231 fish in 1997) is not only painful but foolishly short-sighted. **At the very least, a cap of 36,000 king salmon caught as bycatch annually should be put in place.** As it now stands there is little incentive for the trawl fleet to significantly reduce chinook bycatch.



CRAIG MATKIN
P.O. BOX 15244
HOMER, AK 99603

JOSEPH D. SEBASTIAN
129
POINT BARNEZ, AK 99927

12.12.98

As a Alaska Commercial fisherman

Myself, a troller, I am shocked and sickend

by the wasteful trawler by catch of King Salmon.

This is an insane practice and must
be halted. There is no excuse that makes

any sense to allow this travesty to
continue.

Please do what is in your power
to stop this pointless and senseless
waste.

Thank you

Joseph Sebastian

Rick Lauber, Chair
North Pacific Fishery Management Council
605 West Fourth Avenue
Anchorage, AK 99501

December 13, 1998

Mr. Lauber:

I am a Cordova-based salmon gillnetter in the Prince William Sound – Copper River area. I am very concerned about the Chinook Salmon bycatch levels that are currently allowed in the Bering Sea and Gulf of Alaska trawl fisheries. I feel that the current bycatch levels are too high and the mechanism used to control chinook bycatch is not an effective deterrent to the trawl fleet.

Although the bycatch of chinook bound for the Copper River may be relatively small, I would like to see it reduced and I am concerned for the other salmon fisheries to the west that may be more affected by trawl interceptions of their chinook.

As the Magnuson-Stevens Act requires fishery managers to minimize bycatch through more selective fishing practices, I urge you and the rest of the council to take action to make this happen.

Thanks for your consideration of my request.

William Lindow

William P. Lindow
P.O. Box 1612

Cordova, AK 99574

RECEIVED
DEC 17 1998
N.P.F.M.C

James R. Jackson, Jr.
15301 Elmore Road
Anchorage, AK 99516
907-345-1248(h)
907-265-5545(w)

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DEC - 3 1998
N.P.F.M.C

Rick Lauber, Chair
North Pacific Fishery Management Council
605 W 4th Ave
Anchorage, AK 99501

Re: Chinook By-catch

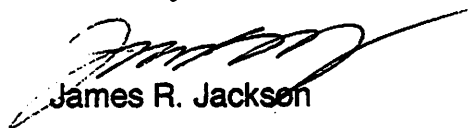
Dear Mr. Lauber:

I am extremely concerned about wasteful bycatch in the Bering Sea, including the extremely high catch of chinook. There is now no effective control over this bycatch and no incentive for the trawl fleet to reduce their bycatch.

The existing bycatch is both harmful to the resource and to the people in many communities who depend on these chinook.

I urge you to adopt proposals, such as that submitted by the Yukon River Drainage Fisheries Association, to reduce chinook bycatch in the Bering Sea.

Sincerely,


James R. Jackson

cc: Senator Stevens
Senator Murkowski
Rep. Young

12.19.98
John Lyle
Fax 83715
Foks AK.97708

RECEIVED
DEC 21 1998
Dear Rick Lantz, N.P.F.M.C.

As a personal use consumer of King salmon from Copper River and Prince Van Sound, we are concerned about the issue of being so church bycatch.

We read that current returns of church in some areas have been low for two years and also that levels of church bycatch have been high. These two items, in conjunction with each other, mean that, in my opinion, N.P.F.M.C. must seriously consider meaningful moves to reduce church bycatch. A better effort is not acceptable, nor will it make a

difference. As our fish resources get further depleted (over fishing, pollution, loss of habitat, etc) you will become tougher and more persistent. I request your position and hope you and the N.P.F.M.C. will act in a meaningful way.

Sincerely, John

Bill Rotecki
PO Box 7738
Ketchikan, Ak 99901
November 30, 1998

Rick Lauber, chair
North Pacific Management Council
605 w 4th Ave.
Anchorage, Ak. 99501

Fax 907-271-2809

Re: bycatch proposals

Rick Lauber:

RECEIVED

DEC - 1 1998

N.P.F.M.C

I would like to support the reduction of allowable bycatch of chinook salmon in the bering sea.

- 1) As a longliner we did next to nothing about bird by-catch until we were made to. I think this is typical. The problem did not seem relevant to us, and the solution looked to be a pain in the but. However, once we were forced to, we tried a few things, and very shortly we totally eliminated the problem on our boat, and very shortly the extra effort became a part of regular operations.
- 2) Ignoring the problem will not make it go away. If the longline fleet has instituted BSD's years ago, we might not even have a problem now, but in any case it would be noticeably less. **THERE IS A CHINOOK PROBLEM, AND IT WILL BECOME A REAL PROBLEM FOR FISHERS IF IT BECOMES A LISTED SPECIES!!**
- 3) The Magnussen-Stevens Act requires that fishery managers minimize bycatch through more selective fishing practices. Place the responsibility on the fleets that are responsible. If their survival depends on it they will find a better way.

To reiterate:

Pay now or pay later. Paying now will definitely create conflict, but it is also the most likely path to assure a continuing fishery. Paying later may be a total shutdown due to a listed species.

Thanks for considering my points in your deliberations.

Bill



11/29/98

To: Stewart Fry/Loren

I am writing to urge you to reduce the level of clinical bycatch as much as possible.

The Magnuson-Stevens act requires that fishery managers minimize bycatch through more selective fishing practices. This is a clear opportunity to achieve this without the goal for climate salmon bycatch.

Thank you for your consistent effort.

Sincerely,

Michael S. Mullins
P.O. Box 436

London, AL 98574

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DEC - 1 1998

N.P.F.M.C

December 1, 1998

Rick Lauber, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue
Anchorage, Alaska 99501

FAX: (907)271-2809

RECEIVED
DEC - 1 1998
N.P.F.M.C

Dear Mr. Lauber:

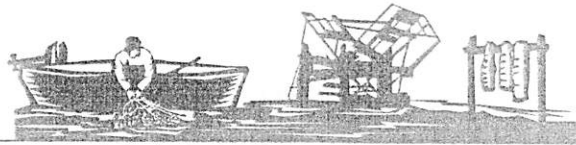
I am writing to urge the North Pacific Fishery Management Council to support reducing the chinook bycatch to 36,000 fish on a year-round basis. I do not believe that management measures currently in place to reduce chinook bycatch are effective. What is the point of having a cap in place by April 15 if that cap is almost never reached by that date?

I strongly urge the North Pacific Fishery Management Council to reduce the bycatch cap for chinook inside the savings areas. These decisions, tough as they are, need to be made now.

Thank you.



M. Sue McGowan
P. O. Box 21842
Juneau, Alaska 99802



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

733 WEST 4TH AVENUE SUITE 881 ANCHORAGE, ALASKA 99501 (907) 279-6519

February 7, 1999

**Summary of oral testimony to the NPFMC;
re: D-1(c), Chinook Salmon Bycatch
Dan Senecal-Albrecht, Executive Director**

1. Alternative 2, a 48,000-fish trigger closure, even if in effect the entire year will still result in a total annual bycatch of 50,000 - 60,000 chinook. A trigger of 41,000 for the pollock fisheries only will yield exactly the same result once the 7,000 chinook caught annually by the non-trawl fisheries are added in. In reality Alternative 2 will yield the essentially the same high bycatch as the status quo.
2. Upon further analysis and hearing the debate of the Advisory Panel, YRDFA supports the following changes to Chinook Salmon Savings Area; (a) delete blocks 274 and 275, the "Pribilof blocks" and (b) add block 226, a block just west of the current CSSA. Adding block 202 as we suggested in our January 27 letter to the Council now would appear to be less effective as its bycatch rates are not as consistently high.
3. We also agree with the Advisory Panel's recommendation to have the Council initiate an analysis, for time certain implementation in 2001, to apportion the chinook salmon PSC trigger by either (a) sector; (b) individual co-op, or; (c) individual vessel. It is critical that this analysis begin immediately so that the chinook PSC is apportioned equally based upon one's allocation of pollock.
4. However, we must disagree with the 4-year phase in of reductions to the trigger level from 41,000 chinook to 29,000 chinook in the pollock fisheries. Consistent with Alternative 3, with our Association's position and as unanimously recommended by the 47 letters sent to the Council by the public, the Council should immediately implement a flat 29,000 chinook trigger level for the pollock-only fisheries.
5. Finally, we must disagree strongly with the SSC's comments that this is an allocation issue. The Council does not regulate the state's salmon fisheries nor does the state of Alaska regulate the pollock fisheries. Salmon fishermen don't intercept pollock. This is a bycatch reduction issue, plain and simple. Catch your target fish and leave the other fish alone.

Myers

2 pages total
- cover page
- Table 10



Submitted by Dan Senecal-Albrecht
Executive Director
Dan Senecal-Albrecht
(907) 279-6519
733 West 4th Ave. #381 Anchorage, AK 99501
FAX (907) 258-6688
Toll Free 1-800-328-9437

NPAFC
Doc. 276
Rev. _____

Table 10 from
↓

INCIDENCE OF CODED-WIRE TAGGED SALMONIDS IN COMMERCIAL AND RESEARCH CATCHES IN THE NORTH PACIFIC OCEAN AND BERING SEA, 1996-1997

by

**Michael Dahlberg, Susan Fowler,
and Frank Thrower**

**AUKE BAY LABORATORY
Alaska Fisheries Science Center
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
11305 Glacier Highway
Juneau, AK 99801-8626, U.S.A.**

Submitted to the
NORTH PACIFIC ANADROMOUS FISH COMMISSION
by the
UNITED STATES OF AMERICA

September 1997

THIS PAPER MAY BE CITED IN THE FOLLOWING MANNER:

Dahlberg, M., S. Fowler, and F. Thrower. 1997. Incidence of coded-wire tagged salmonids in commercial and research catches in the North Pacific Ocean and Bering Sea, 1996-1997. (NPAFC Doc. 276) Auke Bay Laboratory, Alaska Fisheries Science Center, NMFS, NOAA, 11305 Glacier Highway, Juneau, AK 99801-8626. 12 p.

Additional written testimony will be submitted which will summarize my oral testimony to the Council.

--Dan Senecal-Albrecht
Dan Senecal-Albrecht
2/7/99

indicates Oregon CWT-chinook recovery in BSAI trawl fishery
 from Duhlberg, Fowler and Thrower NPAFC, Doc 276, September 1997

Table 10. --Release and recovery information for coded-wire tagged salmon recovered from the North Pacific Ocean and Bering Sea, 1 January 1996 through December 31, 1996.

RELEASE										RECOVERY									
A	B	C	D	D	R	B	S	TOTAL NO.	DATE	DATE	LAT	LONG	LENGTH	BODY	CONAD	S	E	SPECIES	
G	A	A	A	A	E	R	3	TAGGED		D	M	D	M	TSFT	WT	WT			
E	T	T	T	T	F	P	P												
N	A	A	A	A	A	O	A												
C							R												
V	1	2	3	4	D	YR	T												
							O												
							V												
							AGENCY												
1996																			
021043	91	BABINE R.	UPR	BC	CDFO	15861	0593	960203	55	45	N	163	41	W	700	5400	M	TRAWL	CHINOOK
021524	90	QUESNEL L	BC	CDFO	50197	1031	960521	46	43	N	124	36	W	750	2000	F	TRAWL	CHINOOK	
032238	92	L PORT WALTER	109-10	AK	NMFS	10118	0594	960202	57	59	N	152	2	W	520	2100	M	TRAWL	CHINOOK
043802	90	TAKU R 111-32	AK	ADFG	4353	0693	960900	AREA	517					710	5000	F	TRAWL	CHINOOK	
044030	90	FISH CR 111-50	AK	ADFG	29562	0693	960123	57	56	N	152	4	W	800	7300	M	TRAWL	CHINOOK	
044062	92	BEAR COVE 113-41	AK	NSRA	9544	0594	960130	57	58	N	152	16	W	620	3200	F	TRAWL	CHINOOK	
044105	92	BEAR COVE 113-41	AK	NSRA	9371	0594	960131	58	2	M	153	35	W	570	2800	F	TRAWL	CHINOOK	
044111	92	BEAR COVE 113-41	AK	NSRA	8106	0694	960200	57	58	N	152	6	W	490	1500	F	TRAWL	CHINOOK	
044123	92	TAYYA INLET 115-34	AK	NSRA	11745	0594	960130	58	2	N	153	34	W	530	2400	F	TRAWL	CHINOOK	
044143	92	HERRING COVE 101-45	AK	SSRA	52542	0594	960309	56	10	N	154	6	W	600	2100	F	TRAWL	CHINOOK	
0501010805	92	COLEMAN NFH	CA	FWS	59440	0493	960515	44	41	N	124	38	W	950	8500	M	TRAWL	CHINOOK	
0501011209	94	L. W. SALMON/YAKIMA	WA	FWS		0495	960728	59	27	N	139	43	W	391			RESTRAWL	CHINOOK	
0501011215	94	GREEN R & TRIPS ABV	WA	MUCK	97948	0395	961027	48	19	N	124	54	W	390	600	F	TRAWL	CHINOOK	
053412	93	COLEMAN NFH	CA	FWS	69894	0194	960515	44	45	N	124	33	W	650	6800	M	TRAWL	CHINOOK	
053429	93	COLEMAN NFH	CA	FWS	52483	0494	960515	44	45	N	124	33	W	610	2300	M	TRAWL	CHINOOK	
063139	92	MILLER PARK	CA	CDFG	49786	0593	960522	45	20	N	124	22	W	760	6900	F	TRAWL	CHINOOK	
063149	94	DOS REIS ROAD	CA	CDFG	51670	0595	960713	48	25	N	124	53	W	420	850	M	TRAWL	CHINOOK	
070225	92	ELK R	OR	ODFW	32475	1193	960530	47	1	N	124	57	W	800	7800	M	TRAWL	CHINOOK	
070227	92	DESCHUTES R - 2	OR	ODFW	69753	0594	960500	47	47	N	125	7	W	780	6500	F	TRAWL	CHINOOK	
070232	92	BIG CR - L COL R	OR	ODFW	52453	0893	950521	45	54	N	124	54	W	790	6900	F	TRAWL	CHINOOK	
070353	92	WILSON R	OR	ODFW	21674	0893	960519	47	29	N	124	49	W	830	8700	F	TRAWL	CHINOOK	
070420	92	SALMON R. OR COAST	OR	ODFW	28386	0893	960130	54	43	N	165	46	W	630	3570	M	TRAWL	CHINOOK	
070421	92	SALMON R. OR COAST	OR	ODFW	40339	0893	960315	54	55	N	158	12	W	750	5500	F	TRAWL	CHINOOK	
070422	92	ELK R	OR	ODFW	35509	1193	960530	46	59	N	124	54	W	620	3200	F	TRAWL	CHINOOK	
070423	92	ELK R	OR	ODFW	36278	1193	960523	46	58	N	124	59	W	730	5800	M	TRAWL	CHINOOK	
070423	92	ELK R	OR	ODFW	36278	1193	960530	46	57	N	124	50	W	820	7800	M	TRAWL	CHINOOK	
070423	92	ELK R	OR	ODFW	36278	1193	960530	46	57	N	124	50	W	820	7800	M	TRAWL	CHINOOK	
070459	93	SALMON R	OR	ODFW	32486	0894	960723	56	5	N	134	54	W	695			RESTRAWL	CHINOOK	
070460	93	SALMON R. OR COAST	OR	ODFW	36872	0894	961017	55	14	N	164	45	W	700	4700	F	TRAWL	CHINOOK	
070522	93	ELK R	OR	ODFW	37690	1094	960712	58	36	N	148	42	W	560	2200	F	TRAWL	CHINOOK	
070740	93	TRASK R	OR	ODFW	27579	0894	960206	54	48	N	165	21	W	520	2150	F	TRAWL	CHINOOK	
070760	93	PISTOL R	OR	ODFW	25368	1194	960519	47	37	N	125	7	W	490	1350	F	TRAWL	CHINOOK	
071419	91	ELK R	OR	ODFW	18886	1192	960831	54	55	N	167	15	W	670	4600	M	TRAWL	CHINOOK	
071462	91	PISTOL R	OR	ODFW	21967	1192	960523	46	58	N	125	0	W	710	4600	F	TRAWL	CHINOOK	
075801	91	FALL CR - ALSEA	OR	ODFW	21100	0892	960526	47	19	N	124	46	W	960	11200	F	TRAWL	CHINOOK	
076026	91	NESTUCCA R	OR	ODFW	21947	0893	960521	47	25	N	124	49	W	780	6800	F	TRAWL	CHINOOK	
076121	92	MCKENZIE R - 1	OR	ODFW	169400	0394	960206	54	48	N	165	21	W	620	3400	F	TRAWL	CHINOOK	
076323	92	WILLAMETTE R. M FK 2	OR	ODFW	26020	0294	960312	59	58	N	144	39	W	670	3400	F	TRAWL	CHINOOK	
180248	90	KENNEDY L	BC	CDFO	26258	0691	960406	55	1	N	164	38	W	740	5700	M	TRAWL	CHINOOK	
180325	91	ATNARKO R. LWR	BC	CDFO	29568	0493	960128	57	38	N	154	28	W	810	8320	F	TRAWL	CHINOOK	
180610	92	BABINE R. LWR	BC	CDFO	10202	0494	960123	57	5	N	152	23	W	540	1900	M	TRAWL	CHINOOK	
180633	93	CONUMA ESTUARY	BC	CDFO	29026	0594	960326	58	0	N	154	31	W	510	1500	M	TRAWL	CHINOOK	
180634	94	NAHMINT R	BC	CDFO	29280	0595	961011	54	53	N	164	53	W	410	800	F	TRAWL	CHINOOK	
180837	91	SALLOMONT R	BC	CDFO	59876	0792	960706	56	45	N	154	22	W	820	7600	F	TRAWL	CHINOOK	
180852	92	NICOLA R	BC	CDFO	75062	0493	960910	54	55	N	165	38	W	490	1500	F	TRAWL	CHINOOK	
180908	92	ATNARKO R. LWR	BC	CDFO	22560	0494	960200	57	58	N	152	6	W	590	2700	F	TRAWL	CHINOOK	
181209	94	ATNARKO SPAWN CHAN	BC	CDFO	58670	0695	961009	54	51	N	165	8	W	490	1800	M	TRAWL	CHINOOK	
181211	92	CHILLIWACK R	BC	CDFO	49419	0593	960516	47	46	N	125	2	W	830	7300	F	TRAWL	CHINOOK	
181225	92	COLDWATER R	BC	CDFO	47561	0494	960224	54	46	N	165	59	W	570	2270	F	TRAWL	CHINOOK	
181232	93	CHEHALIS R	BC	CDFO	49269	0494	960713	OFF	WASH COAST					825	7200	F	TRAWL	CHINOOK	
181233	93	CHEHALIS R	BC	CDFO	49158	0494	960521	47	53	N	124	55	W	740	5100	M	TRAWL	CHINOOK	
181236	93	ATNARKO R. UPR	BC	CDFO	59245	0694	960909	AREA	630					670	4200	F	TRAWL	CHINOOK	
181238	93	ATNARKO SPAWN CHAN	BC	CDFO	56041	0595	961005	55	23	N	164	58	W	575	2800	F	TRAWL	CHINOOK	
181316	93	BABINE R. UPR	BC	CDFO	29432	0495	961004	55	0	N	164	56	W	500	230	F	TRAWL	CHINOOK	
181316	93	BABINE R. LWR	BC	CDFO	29432	0495	961017	55	16	N	164	44	W	510	1850	F	TRAWL	CHINOOK	
181363	93	CONUMA ESTUARY	BC	CDFO	25529	0494	960308	59	7	N	150	52	W	480	1000	M	TRAWL	CHINOOK	
181426	93	NITINAT R	BC	CDFO	51827	0594	961008	55	9	N	164	45	W	650	5400	F	TRAWL	CHINOOK	
181432	93	DOME CR	BC	CDFO	50396	0495	961011	55	9	N	164	42	W	500	1800	M	TRAWL	CHINOOK	
181445	93	QUESNEL R	BC	CDFO	73231	0495	961009	55	16	N	165	3	W	510	2400	F	TRAWL	CHINOOK	
181447	94	CAPILANO R	BC	CDFO	75367	0595	960713	48	27	N	124	51	W	410	925	M	TRAWL	CHINOOK	
181539	93	ROBERTSON CR	BC	CDFO	25235	0594	960131	58	0	N	153	40	W	900			TRAWL	CHINOOK	
181546	93	ROBERTSON CR	BC	CDFO	27444	0694	960123	57	N	152				550	3400	M	TRAWL	CHINOOK	
181558	93	CONUMA R	BC	CDFO	36037	0594	961011	55	13	N	164	31	W	650	4400	M	TRAWL	CHINOOK	
181641	94	SHUSWAP R. LWR	BC	CDFO	75085	0595	961011	55	9	N	164	53	W	440	1000	M	TRAWL	CHINOOK	
181859	94	NITINAT L	BC	CDFO	21056	0595	961013	55	36	N	165	1	W	490			TRAWL	CHINOOK	
182123	94	CHILLIWACK R	BC	CDFO	23660	0595	960709	48	24	N	124	57	W	920	9500	M	TRAWL	CHINOOK	
182124	94	CHILLIWACK R	BC	CDFO	24501	0695	960524	47	13	N	124	50	W	397	690	M	TRAWL	CHINOOK	
182125	94	STAVE R	BC	CDFO	24708	0595	960207	54	46	N	165	21	W	590	2600	F	TRAWL	CHINOOK	
212329	93	GROVERS CR 15.0299	WA	SUQ	203133	0594	960702	48	23	N	124	54	W	443	1100	F	TRAWL	CHINOOK	
312318	93	NINILCHIK R 244-20	AK	ADFG	45546	0594	960903	54	40	N	165	11	W	620	3200	M	TRAWL	CHINOOK	
312320	92	HOMERSPIT 241-13	AK	ADFG	45518	0794	960908	54	48	N	165	18	W	630	6050	F	TRAWL	CHINOOK	
312429	94	SELDOVIA HBR 241-1																	

RUBY TRIBAL COUNCIL
P.O. BOX 210
RUBY, ALASKA 99768
PHONE: (907) 468-4479
FAX: (907) 468-4474

RUBY TRADITIONAL COUNCIL

RESOLUTION 99-15

ADVOCATING THE ADOPTION OF STRICTER MEASURES TO CONTROL AND REDUCE CHINOOK SALMON CATCH IN THE BERING SEA POLLOCK TRAWL FISHERY.

WHEREAS chinook salmon are a mainstay of the commercial and subsistence fisheries of the Yukon River villages, including the village of Ruby,

WHEREAS Yukon River commercial and subsistence fishermen make sacrifices every year to assure sufficient escapement to maintain the chinook salmon runs;

WHEREAS excessively high bycatch of chinook salmon in the Bering Sea pollock trawl fisheries only adds to this conservation burden borne by river fishermen and also makes it more difficult for ADF&G managers to provide for a sustained yield;

WHEREAS the current Federal regulations have had no effect since their inception in 1996 on reducing or even discouraging chinook salmon bycatch;

THEREFORE BE IT RESOLVED that the Ruby Traditional Council strongly urges the North Pacific Fishery Management Council to adopt a lower bycatch trigger of a 36,000 chinook and that bycatch of chinook taken throughout the entire year apply towards this 36,000 fish level that would trigger a closure of the Chinook Salmon Savings Area.

CERTIFICATION

We hereby certify that this resolution was duly passed and approved by the Ruby Tribal Council on this 2nd day of month, 1999 by a vote of 6 yes, 0 no, 0 abstain.


Tribal Council Chief


Tribal Council Clerk

YUKON RIVER COMMERCIAL FISHING ASSOCIATION

**Box 552
Dawson, Yukon
Y0B 1G0**

one page sent by facsimile to 907 271 2817

February 6, 1999

North Pacific Fishery Management Council
Attn: Rick Lauber, Chairman
605 West 4th Avenue, Suite 306
Anchorage, Alaska
99501 - 2252

Dear North Pacific Fishery Management Council,

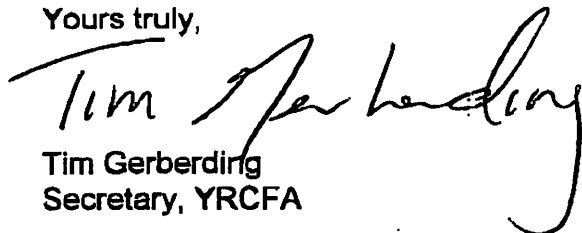
I am writing on behalf of the Yukon River Commercial Fishing Association (YRCFA) to lend our support to the position put forward by the Yukon River Drainage Fisheries Association with respect to management alternatives in the pollock fishery that will reduce the annual bycatch of chinook salmon.

The YRCFA represents commercial fishers within the Canadian portion of the Yukon River. Like our American counterparts, we support actions designed to reduce the marine interception of Yukon River salmon stocks. Both our respective governments have recognized this as a key component in rebuilding depressed stocks on the Yukon River. In spite of the difficulties our governments face in reaching agreement on an all encompassing treaty, both are committed to continuing to work together to preserve and rebuild the stocks that fishers on both sides of the border depend upon.

We understand that at least 5 chinook salmon tagged in the Whitehorse hatchery have turned up in the pollock fishery in the past eight years. Given the difficulty in recognizing these fish and the relatively small numbers of Whitehorse hatchery stocks in comparison to other Canadian Yukon River chinook stocks, we believe this number is significant, and indicates that the chinook bycatch in the pollock fishery has a considerable effect on Yukon River chinook stocks. We do not believe that the proposed management actions will have an unduly adverse effect on the pollock fishery.

Please take timely action on this important issue. Thank-you for your attention to this matter.

Yours truly,



Tim Gerberding
Secretary, YRCFA

cc YRDFA

Yrdfa.let

YUKON RIVER COMMERCIAL FISHING ASSOCIATION

**Box 552
Dawson, Yukon
Y0B 1G0**

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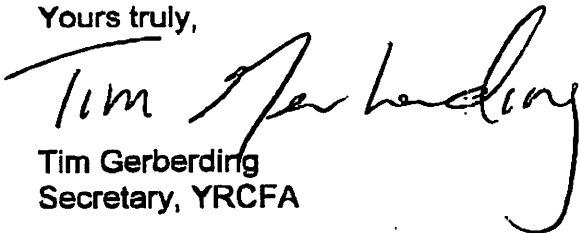
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Please take timely action on this important issue. Thank-you for your attention to this matter.

Yours truly,



Tim Gerberding
Secretary, YRCFA

cc YRDFA

Yrdfa.let

James Sipary

UNITED VILLAGES, INC.
P.O. Box 37148
Toksook Bay, Alaska 99637
Ph. (907) 427-7827 / FAX (907) 427-7915

Resolution 99-01

A RESOLUTION OF THE UNITED VILLAGES, INCORPORATED CONCERNING THE REDUCTION OF CHINOOK BYCATCH IN THE TRAWL FISHERIES OF THE BERING SEA.

WHEREAS: The North Pacific Fisheries Management Council (NPFMC) is considering a proposal by the Yukon River Drainage Fisheries Association to reduce the Bering Sea Chinook bycatch cap from 48,000 to 36,000 chinook per year and other conservation measures, and;

WHEREAS: The Magnuson-Stevens Act requires the NPFMC to minimize bycatch, and;

WHEREAS: 60% of the Bering Sea chinook bycatch originate in western Alaska river systems and 17% originate in Gulf of Alaska river systems including the Copper, Kenai, Susitna and Chignik rivers, and;

WHEREAS: Coastal villages of the Bering Sea, villages of the Yukon and Kuskokwim Rivers and communities along the Gulf of Alaska depend heavily on chinook salmon for subsistence, commercial and recreational fisheries, and;

WHEREAS: Salmon returns have been extremely low in the last two years and Governor Tony Knowles has declared a fishing disaster for Bristol Bay, Kuskokwim and Yukon River areas in both 1996 and 1997, and;

WHEREAS: 48,000 chinook are permitted to be killed and wasted as bycatch in Bering Sea Trawl fisheries every year, and;

WHEREAS: The fleet exceeds this cap in most years, and;

WHEREAS: The trawl fisheries can be managed to reduce this bycatch and still harvest their quotas of target species of ground fish, now;

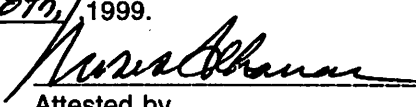
THEREFORE BE IT RESOLVED THAT United Villages Incorporated requests the North Pacific Fisheries Council to adopt the Yukon River Drainage Fisheries Association proposal to reduce the Bering Sea Chinook bycatch cap from 48,000 to 36,000 chinook per year.

Certification

Passed and approved this date January 20th, 1999.



Chairman/President



Attested by