

Department of Fish and Game

Alaska Board of Fisheries

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March 21, 2018

Dan Hull, Chairman North Pacific Fishery Management Council 605 West 4th, Suite 306 Anchorage, Alaska 99501-2252

Subject: Council Action on Gulf of Alaska Non-Pollock Trawl Chinook Salmon Prohibited Species Catch

Dear Chairman Hull:

At the Alaska Board of Fisheries (Board) Southeast Shellfish and Finfish meeting in January 2018, the Board received a brief report describing the North Pacific Fishery Management Council's (Council) current consideration of increasing or modifying, the Chinook salmon prohibited species catch (PSC) limits in the Gulf of Alaska non-Pollock trawl fisheries. This was followed up at the Board's March meeting with a more in-depth briefing. The Board is concerned about increasing the Chinook salmon PSC limits for several reasons.

During the Board Work Session in October 2017, the Board designated three Southeast Alaska Chinook salmon runs as Stocks of Management Concern. At the January 2018 Southeast meeting the Board approved Action Plans designed to rebuild these stocks. These plans impose severe Chinook salmon harvest restrictions on all users in the region for 2018 and subsequent fishing seasons. These restrictions were in response to declines in Chinook salmon abundance, low forecasts of Chinook salmon for 2018, and continued dismal projections for the near future. Specifically, based on 2018 run projections if no Southeast origin stocks are harvested, several systems are forecast to miss meeting minimum escapement goals; these same stocks have not met escapement goals for the past several years despite taking countervailing management actions.

Furthermore, there is concern over the status of Chinook salmon stocks throughout the Pacific Northwest. The State of Alaska is a long-term participant in the Pacific Salmon Commission and works to meet its obligations under the Pacific Salmon Treaty. Other members of the treaty, including Canada and other states, are keenly aware of not only the Chinook salmon harvest and PSC levels in the Gulf of Alaska, but also understand that the majority of Gulf of Alaska Chinook salmon harvest is comprised of non-Alaskan stocks. Given the sensitive nature of current Pacific Salmon Treaty negotiations, increasing the Chinook salmon PSC limits would severely exacerbate already contentious treaty negotiations.

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Given the shared concern for Chinook salmon stocks by all users and the concerted efforts of regulatory bodies to impose severe restrictions on harvest, we find an increase in the PSC limit untenable.

The Board sincerely appreciates the opportunity to comment on this important issue and thank you for your consideration of these concerns.

Regards,

John Jensen

Chairman, Alaska Board of Fisheries

cc: David Witherell, Executive Director, NPFMC

James Balsiger, Alaska Regional Director, NOAA/NMFS

Sam Cotten, Commissioner, ADF&G

Joint Protocol Committee Members