

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-1: Salmon bycatch

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Becca Robbins, Isclair	YRPA
2	Michael Sloan	Kawerak
3	Heather Brandon	World Wildlife Fund
4	JOHN GRUVER/BRENT PAINE	UNITED CATCHER BOATS
5	GLENN REED	PSAA
6	ED RICHARDSON	POLLUC CONSERVATION COOPERATIVE
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



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June 9, 2010

Mr. Eric Olson  
Council Chair  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Street, Suite 306  
Anchorage, AK 99501-2252

Dr. Jim Balsiger  
Regional Administrator  
NOAA Fisheries, Alaska Region  
709 W. 9<sup>th</sup> Street  
Juneau, AK 99802-1668

**Re: Salmon Bycatch C-1**

Dear Mr. Olson and Dr. Balsiger,

On behalf of World Wildlife Fund (WWF) I wish to submit these brief comments regarding chum salmon bycatch reduction measures under consideration by the North Pacific Fishery Management Council (Council). WWF recognizes the ecological, commercial and subsistence values of chum salmon. We recommend that the Council maintain the schedule for Council action to address the bycatch of non-Chinook (chum) salmon in the Bering Sea and Aleutian Islands (BSAI) pollock fisheries chum as described in the May 4, 2010 Power Point presentation by Council staff. This schedule would seek outreach from Western Alaska residents in February/March 2011, review initial analysis and select a preliminary preferred alternative at the June 2011 Council meeting in Nome, and would aim for final Council action in late 2011. This schedule and the Council's non-Chinook bycatch outreach plan, is a commendable effort to obtain input and feedback from rural and Native communities who have less access and opportunity to participate in the Council process otherwise.

It is critically important that the Council consider appropriate and effective ranges for hard caps and trigger caps under the alternatives proposed for analysis, if the Council intends to meaningfully reduce chum salmon bycatch. Minimization of bycatch to the extent practicable is required under Magnuson-Stevens Fisheries Conservation and Management Act - National Standard 9. Therefore, the hard cap and trigger cap alternatives revised by the Council at the February 2010 meeting should go forward for analysis by Council and NMFS staff, bearing in mind the need for realistic chum bycatch levels in low chum abundance years. Additionally, for the sake of comparison, Alternative 1 Status Quo should undergo a similar level of analysis as the other alternatives.

WWF wishes to remind the Council that the issue of salmon bycatch in this Alaska fishery is also an issue of international importance and consequence. Current stock of origin science indicates that a large proportion of chum salmon captured in the BSAI pollock fishery are of Japanese or Russian origin. Since real time data on area of origin is not available, it is imperative that the Council take its responsibility seriously to simply reduce *all* salmon bycatch. The action the Council takes will inevitably have reverberations in Russian and Japanese fisheries facing similar challenges.

In conclusion, WWF supports the Council's intentions to conduct an analysis of the suite of preliminary alternatives presented in C-1 supplemental.

Thank you for your time and consideration of these comments.

Respectfully,

Heather Brandon  
Kamchatka/Bering Sea Ecoregion Senior Fisheries Program Officer  
World Wildlife Fund