

**Eastern Interior Alaska Subsistence  
Regional Advisory Council**

**c/o Office of Subsistence Management  
101 12th Avenue, Room 110  
Fairbanks, Alaska 99701  
Phone: 1-(907)-456-0277 or 1-800-267-3997  
Fax: 1-(907)-456-0208  
E-mail: Vince\_Mathews@fws.gov**

January 30, 2009

Robert D. Mecum, Acting Administrator  
Alaska Region, National Marine Fisheries Service  
National Oceanic Atmospheric Administration  
Post Office Bpx 21668  
Juneau, Alaska 99802

Re: Comments and Recommendations on the Draft Environmental Impact Statement for the Bering Sea Chinook Salmon Bycatch Management

Dear Mr. Mecum:

The Eastern Interior Alaska Subsistence Regional Advisory Council has a keen interest in the sustainability of the returning salmon to Western Alaska, especially the Yukon and Tanana rivers. The Regional Council represents thirteen villages along the Yukon or Tanana rivers and an additional seventeen villages within the Eastern Interior Region. All of these villages are heavily dependent on subsistence caught salmon for personal and community consumption and for their livelihoods. Every community within our Region, through sharing or trading, utilizes returning salmon as a significant part of their subsistence diet. The dramatic rise in salmon bycatch, especially the Chinook salmon with the Bering Sea/Aleutian Islands pollock fishery cannot continue to threaten the future sustainability of the Yukon River salmon stocks, as well as the continuation of a subsistence way of life in Interior and Western Alaska.

The Regional Council appreciated the presentation from Dr. Diana Stram and the discussions with North Pacific Fishery Management Council (NPFMC) members Gerry Merrigan and Duncan Fields during its public meeting on October 14, 2008 in Nenana, Alaska. Based on the presentation and discussions, past Regional Council discussions, and personal knowledge of the Regional Council members the Regional Council unanimously adopted the following recommendations for the DEIS:

1. A Chinook salmon hard cap of 29,323 should immediately be implemented to protect Western Alaska Chinook salmon. This is the only proposed bycatch cap that uses the average bycatch numbers in the years prior to the United States-Canada Yukon River Salmon Agreement of 2001, therefore, the cap which comes closest to complying with the international agreement. The parties to the Agreement are required to increase the in-

river run of Yukon River origin salmon by reducing marine catches and by-catches of Yukon River salmon. They shall further identify, quantify and undertake efforts to reduce these catches and by-catches.

2. The economic penalties on the BSAI fishing industry must be implemented and strictly enforced to prevent high Chinook salmon bycatch. The penalties should apply to the individual trawler vessel and not across the fleet or industry.
3. The North Pacific Fishery Management Council should recommend to the industry that it bear the cost of improved sampling methods and cost of analyzing these samples for genetic studies on the Chinook salmon stocks impacted by the industry's bycatch. This should also be tied to the economic incentives to improve the overall commercial fishery.
4. The North Pacific Fishery Management Council should modify the food bank program to distribute the bycatch salmon to include the Western and Interior Alaska communities. The Regional Council wants it clearly understood that this Western and Interior Alaska distribution would by no means be considered a substitution or replacement of the active in-river subsistence fisheries.
5. The Regional Council is very concerned about the length of time it takes to have a management action implemented when there are clear concerns regarding conservation and sustainability of the Chinook salmon stocks. The Regional Council will be submitting a letter to the Executive Director of the North Pacific Fishery Management Council on this concern for timely management actions.

The Regional Council is authorized by the Alaska National Interest Lands Conservation Act and chartered under the Federal Advisory Committee Act. Section 805 in ANILCA and the Regional Council's charter establish the Regional Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife on public lands within the region and to provide a forum for the expression of opinions and recommendations on any matter related to the subsistence uses of fish and wildlife on public lands within the region.

Thank you for the opportunity to present the Regional Council's recommendations on the DEIS. We and the residents of the Eastern Interior Region look forward to a substantial reduction in BSAI salmon bycatch. A substantial reduction would rebuild the Yukon and Tanana rivers salmon stocks so that, first and foremost, biological escapement needs would be met, the subsistence needs of Alaska and Canada would be met, and allow the Yukon and Tanana rivers' commercial fisheries to return. Continuation of a subsistence way of life and the economic underpinnings of our villages depend on viable and sustainable salmon stocks. If you have any questions or need additional information please, contact me or our council coordinator, Vince Mathews (contact information in letterhead). I can be reached directly at 1-907-883-2833.

Sincerely,



Sue Entsminger, Chair

cc: Eric Olson, Chair, North Pacific Fishery Management Council  
Michael R. Feagle, Chair, Federal Subsistence Board  
Peter J. Probasco, Assistant Regional Director, Office of Subsistence Management  
Rod Campbell, Fisheries Liaison, OSM  
Larry Buklis, Chief, Fisheries Division, OSM  
Tim Jennings, Fisheries & Ecological Service, Fish and Wildlife Service  
Ann Wilkinson, Chief, Council Coordination Division, OSM  
Jill Klein, Executive Director, Yukon River Drainage Fisheries Association  
David Bedford, Deputy Commissioner of Fisheries, ADF&G  
Jack Reakoff, Chair, Western Interior Alaska Subsistence Regional Advisory Council  
Lester Wilde, Chair, Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Eastern Interior Alaska Subsistence Regional Advisory Council members

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Jack Reakoff, Chair, Western Interior Alaska Subsistence Regional Advisory Council  
Lester Wilde, Chair, Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Eastern Interior Alaska Subsistence Regional Advisory Council members

0 - 3  
Submitted by Julia Yphoubrin

Thank you for giving me this opportunity to present myself in writing.

My name is ~~Duane Lincoln~~, I live in Golovin Alaska. My village is located along the southern coastline of the Seward Peninsula approximately 72 air miles east of Nome and 18 air miles North by North West from the point of Cape Darby on Golovin Bay.

For 47 years I have lived a subsistence lifestyle taught to me by my parents, grandparents and other elders of the community. Our major food diet is the fish. When I heard that the Pollock bycatch fishery was catching many unwanted fish like the king salmon and then throwing them back into the high seas-dead, made me think mismanagemant and disrespect to those of us who utilize the king salmon.

As a fish eater, I could see the effects and feel the impact of the loss of the king salmon on my lively hood.

The king salmon is the freshest of fish at the beginnings of our summers. I and other members of my family and community eat the majority of parts of the king salmon except for the gills and guts. When we fish, it's by the State of Alaska Regulations.

What I catch or other members of my family catch, we share with other family members not living along the coast. We utilize this food at potlucks, picnics, hunting or fishing trips and berry picking outings. What is thrown away in the high seas is a waste and is seen as a sign of disrespect towards our lively hood as a Native people.

C-3

STEBBINS COMMUNITY ASSOCIATION  
 IRA COUNCIL  
 P.O. Box 71002  
 Stebbins, Alaska 99671  
 PH. (907) 934-3561 / FAX 934-3560



January 30, 2009

Mr. Eric Olson, Chair  
 North Pacific Fisheries Management Council (NPFMC)  
 605 W. 4<sup>th</sup> Ave. Suite 306  
 Anchorage, Ak. 99501-2252

Mr. Doug Mecum, Regional Administrator  
 NOAA Fisheries, Alaska Region  
 P.O. Box 21668  
 Juneau, Ak. 99802-1668

Re: Chinook By-Catch

Dear Mr. Olson and Mr. Mecum,

I was not able to come in person and I hope that you will excuse me and accept this testimony.

It is good to know that you both have Alaska Addressess. First, I am going to provide some information of Stebbins Community. We have a State incorporated "City of Stebbins". 1968 and Stebbins IRA (Indian Reorganization Act of 1934) Stebbins IRA established with this Act in 1939 and have served Stebbins since then. Stebbins IRA is a political, social and economic entity to serve it's 814 members. Stebbins is cash poor and a natural resource rich area. Stebbins membership (related to Stebbins IRA) and Residents, same people, are related to City of Stebbins, natives and non-natives. Prior to the passage of the IRA Constitution and bylaws and long before the inception of the City, the village was governed by an active Traditional Tribal Council.

Stebbins is a Yupik Eskimo village located northwest coast of St. Michael Island (notable due to Nome Gold Rush and the U.S. Army Post which were put there to enforce law @ Nome. The isolated community is 120 miles southeast of Nome, nearest regional hub and 870 miles northwest of Anchorage ( the largest commercial center for goods and services). Stebbins is accessible and serviced by Air Transportation year round.

Stebbins is derived from Stevens. Elders could not sound out the "V" and pronounced Stebbins. Stebbins was first recorded in 1898 by the U.S. Coast and Geodetic survey.

In 1950, Stebbins was described as a village of Yupik Eskimos who make their livelihood by hunting, fishing, and herding reindeer. The economy of Stebbins remains primarily herring fishing (now inactive, due to market conditions. Food fish of the Chinook and other salmon species

All cash positions are in local government (IRA and City, village corporation established by Alaska Native Claims Settlement Act of 1971, School, and two local grocery stores. Seasonal jobs are firefighting, local projects, if any.

Stebbins receives State Services of Food Stamps, 64 or 13% get food stamps and USDA Food Bank Service, administered by Stebbins IRA. 34 with State and 20 with USDA Program, in 2008.

83 or 10% also received heating assistance in 2008. Data is derived from the 2 fee agents, IRA Tribal Coordinator and the local fuel company.

Since inception of commercial salmon in the Norton Sound district, Stebbins is excluded from commercial fishing of salmon, the justification is that we intercept would intercept salmon.



The by catch of Chinook salmon has a negative impact to the coastal areas of Bristol Bay, Yukon - Kuskokwim coastal and rivers, Norton Sound and the Country of Canada, that depend on the resource for subsistence and commercial. I am a commercial salmon permit holder, issued by the State and voluntarily and due to cost prohibitiveness, late openings, shorter fishing time have not fished in 2007 and 2008 and will not participate in 2009 in the pursuit of Chinook salmon fishing, but will concentrate on subsistence fishing. The 130 to 150,000 ( my understanding ) by catch of Chinook Salmon in 2007 is very alarming and the by catch of Chinook and chum are documented from 2003 to 2007, 2008, its no wonder that Chinook salmon numbers are coming down, to those coastal areas .

Consistent with Association of village Council Presidents, that encompasses the 56 Yukon / Kuskowim Delta, villages, Native Village of Stebbins( Stebbins and St. Michael are within the Yukon Delta National Wildlife Refuge, USFWS ) favors a 30,000 cap of Chinook by catch. Although the Pollock fishery is justified in commercially feeding the masses, the harvesters in the Bering Sea have and are contributing drastically to the decline of the Chinook and chum salmon. Chinook / King Salmon feed on the Pollock and the by catch cannot be avoided and will continue, despite efforts to lower the by catch.

Thank you for giving me the opportunity to testify.

*Fred*  
Fred Pete, Sr.  
President



February 3, 2009

Eric Olson, Chair  
 North Pacific Fishery Management Council  
 605 W. 4<sup>th</sup> Ave.  
 Anchorage, AK 99501

RE: Chinook salmon bycatch EIS, Agenda Item C-3

Dear Mr. Olson,

The Alaska Marine Conservation Council (AMCC) was closely engaged in the Council's decision in 1999 to reduce Chinook salmon bycatch to 29,000 (BSAI Amendment 58). The issue was of utmost importance to villages along the coast then and, unfortunately, it remains so today. Over time the cap did not turn out to be effective because it was applied only to the Chinook Salmon Savings Area. Salmon bycatch increasingly occurred outside the savings area rendering the area closure no longer a functional constraint. The news from Yukon River villages this year represents a dire situation in which people were unable to harvest sufficient salmon for subsistence purposes.

We appreciate the Council's pursuit of bycatch solutions but we do not believe the preliminary preferred alternative is an acceptable way forward. Furthermore, after listening to the pollock industry's presentation on incentive programs, we are not at all confident that the plans will successfully drive down salmon bycatch to low levels. The incentive programs may be creative approaches but as long as the cap is high, what motivation does the industry have to challenge themselves? We are especially concerned that the performance of the incentive programs is not going to be subject to an objective evaluation. We are supportive of rewarding clean fishing and to allow industry room to apply innovative mechanisms to change behavior. However, leaving evaluation of the results up to vested parties does not serve the public interest.

AMCC is in full support of the villages dependent on Chinook salmon and their call for an immediate 30,000 cap followed by progressive declines in the cap. In 1999, the Council chose a declining cap from 48,000 to 29,000 in the pollock fishery for good reasons. The Council should not abandon those deliberations by returning to a high number. The Council should not be starting over but rather continuing a rigorous program to continually improve fishery performance to minimize salmon bycatch. To set a higher cap is breaking a promise made in 1999.

The Magnuson-Stevens Act requires that management minimize bycatch to the extent practicable. The Chinook salmon bycatch EIS is considering what is practicable for the pollock sector. But no consideration is given to what is practicable for salmon-dependent villages. Clearly enduring a situation in which there is not enough salmon for subsistence, or failure to even meet Yukon River escapement goals to Canada, is not practicable for the villages.

We join the tribes and regional organizations in urging the Council in taking urgent and progressive action to minimize Chinook salmon bycatch.

Sincerely,



Dorothy Childers  
Fisheries Program Director

cc: Governor Sarah Palin  
David Bill, Sr., Bering Sea Elders Advisory Group  
Myron Naneng, Association of Village Council Presidents  
Loretta Bullard, Kawerak  
Tanana Chiefs Conference  
Yukon River Drainage Fisheries Association

BERING SEA ELDERS ADVISORY GROUP  
c/o Native Village of Kwigillingok  
PO Box 49  
Kwigillingok, AK 99622-0049

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February 5, 2009

Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave.  
Anchorage, AK 99501

Doug Mecum, Regional Administrator  
National Marine Fisheries Service  
709 W. 9<sup>th</sup> St.  
Juneau, AK 99802

RE: Chinook salmon bycatch Draft EIS, Agenda Item C-3

Dear Mr. Olson and Mr. Mecum,

The Bering Sea Elders Advisory Group is authorized by participating tribal governments in the Yukon/Kuskokwim and Bering Strait regions to enhance traditional guidance to our villages on marine fisheries issues.

We formed in 2007 to prepare recommendations for decisions scheduled for 2011 regarding the northern bottom trawl boundary and the future Northern Bering Sea Research Plan. In its first year the Bering Sea Elders Advisory Group grew from eight founding Tribes to 32 Tribes spanning Platinum to Wales. As the Chinook bycatch situation has become increasingly more urgent to our people, the Bering Sea Elders Advisory Group decided to support member Tribes in their calling for an immediate hard bycatch cap of 30,000 Chinook salmon in the pollock fishery.


Throughout the Bering Sea coast our people deeply rely on salmon. Salmon is our culture. Chinook salmon that is taken as bycatch by the offshore pollock fleet is fish that will not return to our rivers. There is no such thing as "surplus" fish that can be sacrificed for bycatch because every fish that returns to our rivers is important for meeting our subsistence needs, for supporting our small commercial salmon harvest, and for contributing to continued migrations of salmon and future generations of our people.

The Draft Chinook Salmon EIS does not recognize our subsistence way of life and history. The Draft EIS considers the potential effect of reducing Chinook bycatch on the pollock fleet's ability to catch more pollock. It does not consider the effect of salmon bycatch on our ability to feed our families and teach our children how to live our traditional way of life. If the pollock catch is reduced it costs money to the fleet. If salmon do not return to our rivers, we don't have enough to eat. When the offshore fleet takes salmon without appropriate constraints, we are the ones to pay the price. We

forego commercial opportunity in the lower rivers and are restricted in how much we can take to feed our families all the way into Canada.

The Bering Sea Elders Advisory Group calls on the North Pacific Fishery Management Council and National Marine Fisheries Service to set the Chinook bycatch cap at 30,000 and to bring the cap down from there over time.

Sincerely,



Arthur Lake  
Executive Director

cc: Governor Sarah Palin  
Myron Naneng, Association of Village Council Presidents  
Loretta Bullard, Kawerak  
Jerry Isaac, Tanana Chiefs Conference  
Yukon River Drainage Fisheries Association

Testimony of Dwayne Johnson  
Native Village of Unalakleet

Thank you for the opportunity to address this council. My name is Dwayne Johnson, I'm here on behalf of the Native Village of Unalakleet. We are a fishing community of 800 located at the mouth of the Unalakleet River in the Norton Sound. Our people have been fishing salmon commercially since the 1950's, and more importantly, we have depended on salmon to feed our families ~~for generations~~ for generations. Commercial fishing for Chinook has been virtually non-existent since 2001 in the Norton Sound. Just a few short years ago, subsistence Chinook needs of entire extended families could be met by fishing for 1 or 2 days. Now, this can take 1 or 2 weeks of fishing or more. Sadly, some families needs are not met, due to the reduced <sup>fishing</sup> schedules and inclement weather.

Both commercial and subsistence fisherman in Unalakleet have supported conservation efforts, accepting both a closure of the commercial chinook fishery and a reduced subsistence fishing schedule. As an example, in 2003 when ADF&G open the chinook fishery in the Unalakleet sub-district, all but 4 or 5 fisherman refused to fish voluntarily, knowing that the chinook run was weak. These local conservation efforts are not enough.

We understand that the polluck industry donates about 10% of salmon by catch to food banks, none of which makes it to western Alaska villages. We are not asking for donations of salmon, we ~~are~~ want to see these salmon mature and return to their rivers of origin. The traditional harvest and preparation of chinook salmon is an important part of our culture, having been passed on from generation to generation. If we lose access to this resource, we lose a part of our culture. That is unacceptable.

The Native Village of Unalakleet supports a non-transferable hard cap of 30,000 chinook that is gradually reduced over time. We oppose any transferring of these allocations between vessels or groups. The buying and selling of these allocations

is just another method of commercializing a depleting stock that is not a target species of this fishery. We feel that this industry, and those that govern it should be making every effort possible to reduce the numbers of salmon by catch.

Before you make your decision on this issue, I encourage each of you to become more aware of the economic hardships the communities in western Alaska are currently enduring, and how important all species of salmon are to the cultural well-being of our people. Thank you for your time and consideration.

Dwayne Johnson  
Native Village of Unalakleet  
PO Box 270  
Unalakleet, AK 99684

907-624-3622  
907-624-3402 Fax

djohnson92unk@yahoo.com



**World Wildlife Fund**  
**Kamchatka/Bering Sea Ecoregion**  
406 G. Street, Suite 303  
Anchorage, AK 99501 USA

Tel: (907) 279-5504  
Fax: (907) 279-5509

[www.worldwildlife.org](http://www.worldwildlife.org)

January 30, 2009

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

Mr. Doug Mecum  
Acting Regional Administrator  
NOAA Fisheries, Alaska Region  
709 W. 9<sup>th</sup> Street  
Juneau, AK 99802-1668

**Re: Salmon Bycatch C-3**

Dear Mr. Olson and Mr. Mecum,

The World Wildlife Fund (WWF) appreciates the opportunity to comment on the salmon bycatch reduction measures being considered for analysis by the North Pacific Fishery Management Council (Council). We submit this letter in continued support of salmon bycatch reduction efforts in the Bering Sea and Aleutian Islands (BSAI) pollock fisheries. We continue to recommend that the Council expedite the analysis of caps and other mechanisms to minimize and reduce salmon bycatch in the BSAI pollock fishery and take the urgent action necessary to protect salmon stocks throughout the North Pacific.

Although salmon bycatch appears to have retreated substantially in 2008, this should not be reason for inaction or consideration of diluted measures. With respect to potential or already occurring cumulative environmental impacts on BSAI salmon populations, such as changes in climate and marine species distribution, impacts of ocean acidification, and planned offshore oil and gas development in Arctic waters and the Bering Sea, it is especially important to implement measures to further reduce and prevent salmon bycatch. Cumulative impacts on salmon populations, coupled with a lack of a cap on bycatch for BSAI salmon can potentially be devastating to local communities, especially indigenous peoples throughout Alaska, Russia and Canada as well as Pacific Northwest residents who were dramatically affected by the Pacific Coast salmon fishery shutdown in 2008.

As evidenced by the historic inattention that led to excessive bycatch of salmon in the pollock fishery in the 2007 season, we cannot simply go back to business as usual because salmon bycatch was lower in 2008. Although a reduction in overall salmon bycatch levels has occurred, the Council must take decisive action to prevent future excessive bycatch of salmon stocks throughout the North Pacific. The best way to achieve that protection is through the implementation of an adequate precautionary cap.

We encourage the pollock fleet to continue to seek measures and techniques to reduce salmon bycatch independent of regulatory requirements. WWF continues to support a rigorous analysis of a reasonable range of reasonable alternatives to reduce salmon bycatch while minimizing the economic impact to the pollock fleet. We recommend the Council adopt Alternative 2, Suboption vii, a hard cap of no more than 32,500 Chinook salmon bycatch. Implementing a hard cap of 32,500 would provide a level of assurance to communities



throughout the North Pacific, many of which were affected by low Chinook salmon returns in 2008 and may have to face projected equal or lower returns in 2009. This proposed hard cap is also the ten year average of bycatch prior to the signing of the Yukon River Salmon Agreement of 2002. When considering other potential impacts to these fisheries, such as climate change, it is important that we implement a precautionary approach in salmon bycatch reduction to protect cultures and livelihoods throughout the North Pacific. However, we recommend that the Council not consider the proposed 32,500 maximum cap as a goal to be met, but an absolute value in a range that must not be exceeded under any circumstance. The Council should continue forward with actions to further reduce bycatch under this level. Furthermore, the Council should carefully consider the recommendations of the Yukon River Panel, Federal Subsistence Board, the US Fish and Wildlife Service, the Community Development Quota groups, and the Regional Advisory Councils in developing the maximum cap for salmon bycatch.

In conclusion, WWF again encourages the Council to move quickly to finalize alternatives for the Salmon Bycatch agenda item C-3 in order to achieve an effective solution as soon as possible. Most importantly, flexibility in the strategy is important to minimize adverse effects on the pollock fishery, but should not preclude decisive action to protect salmon stocks and the communities, commercial fisheries, and subsistence fisheries that depend on them.

Thank you for your time and consideration of these comments.

Respectfully,

A handwritten signature in cursive script that reads "Alfred Lee Cook Jr." with a stylized flourish at the end.

Alfred Lee "Bubba" Cook Jr.  
Kamchatka/Bering Sea Ecoregion Senior Fisheries Program Officer  
World Wildlife Fund



February 3, 2009

Eric Olson, Chair  
 North Pacific Fishery Management Council  
 605 W. 4<sup>th</sup> Ave.  
 Anchorage, AK 99501

RE: Chinook salmon bycatch EIS, Agenda Item C-3

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We appreciate the Council's pursuit of bycatch solutions but we do not believe the preliminary preferred alternative is an acceptable way forward. Furthermore, after listening to the pollock industry's presentation on incentive programs, we are not at all confident that the plans will successfully drive down salmon bycatch to low levels. The incentive programs may be creative approaches but as long as the cap is high, what motivation does the industry have to challenge themselves? We are especially concerned that the performance of the incentive programs is not going to be subject to an objective evaluation. We are supportive of rewarding clean fishing and to allow industry room to apply innovative mechanisms to change behavior. However, leaving evaluation of the results up to vested parties does not serve the public interest.

AMCC is in full support of the villages dependent on Chinook salmon and their call for an immediate 30,000 cap followed by progressive declines in the cap. In 1999, the Council chose a declining cap from 48,000 to 29,000 in the pollock fishery for good reasons. The Council should not abandon those deliberations by returning to a high number. The Council should not be starting over but rather continuing a rigorous program to continually improve fishery performance to minimize salmon bycatch. To set a higher cap is breaking a promise made in 1999.



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We join the tribes and regional organizations in urging the Council in taking urgent and progressive action to minimize Chinook salmon bycatch.

Sincerely,



Dorothy Childers  
Fisheries Program Director

cc: Governor Sarah Palin  
David Bill, Sr., Bering Sea Elders Advisory Group  
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Loretta Bullard, Kawerak  
Tanana Chiefs Conference  
Yukon River Drainage Fisheries Association

BERING SEA ELDERS ADVISORY GROUP  
c/o Native Village of Kwigillingok  
PO Box 49  
Kwigillingok, AK 99622-0049

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The Bering Sea Elders Advisory Group is authorized by participating tribal governments in the Yukon/Kuskokwim and Bering Strait regions to enhance traditional guidance to our villages on marine fisheries issues.

We formed in 2007 to prepare recommendations for decisions scheduled for 2011 regarding the northern bottom trawl boundary and the future Northern Bering Sea Research Plan. In its first year the Bering Sea Elders Advisory Group grew from eight founding Tribes to 32 Tribes spanning Platinum to Wales. As the Chinook bycatch situation has become increasingly more urgent to our people, the Bering Sea Elders Advisory Group decided to support member Tribes in their calling for an immediate hard bycatch cap of 30,000 Chinook salmon in the pollock fishery.

Throughout the Bering Sea coast our people deeply rely on salmon. Salmon is our culture. Chinook salmon that is taken as bycatch by the offshore pollock fleet is fish that will not return to our rivers. There is no such thing as "surplus" fish that can be sacrificed for bycatch because every fish that returns to our rivers is important for meeting our subsistence needs, for supporting our small commercial salmon harvest, and for contributing to continued migrations of salmon and future generations of our people.

The Draft Chinook Salmon EIS does not recognize our subsistence way of life and history. The Draft EIS considers the potential effect of reducing Chinook bycatch on the pollock fleet's ability to catch more pollock. It does not consider the effect of salmon bycatch on our ability to feed our families and teach our children how to live our traditional way of life. If the pollock catch is reduced it costs money to the fleet. If salmon do not return to our rivers, we don't have enough to eat. When the offshore fleet takes salmon without appropriate constraints, we are the ones to pay the price. We

forego commercial opportunity in the lower rivers and are restricted in how much we can take to feed our families all the way into Canada.

The Bering Sea Elders Advisory Group calls on the North Pacific Fishery Management Council and National Marine Fisheries Service to set the Chinook bycatch cap at 30,000 and to bring the cap down from there over time.

Sincerely,



Arthur Lake  
Executive Director

cc: Governor Sarah Palin  
Myron Naneng, Association of Village Council Presidents  
Loretta Bullard, Kawerak  
Jerry Isaac, Tanana Chiefs Conference  
Yukon River Drainage Fisheries Association