

RE: Groundfish harvest specifications: a) GOA Groundfish – Proposed specifications, Joint and GOA Plan Team reports; b) BSAI Groundfish – Proposed specifications, BSAI Plan Team report; c) (SSC only) Final ABC/OFL recommendations for GOA arrowtooth flounder, GOA rex sole, GOA skates, Bogoslof pollock

Council Members, I am writing regarding Agenda Item E2: Committees, New Business, and Tasking – Review. Communities across this coast have accepted deep reductions in salmon harvest. On the Yukon River, directed Chinook fishing was closed from 2021 through 2024, and subsistence harvest fell to roughly 5,777 fish annually from an average of 27,874 in the preceding decade. In California, the commercial salmon season has been closed for three consecutive years. The Stillaguamish and other Puget Sound Tribes have gone more than thirty years without a targeted commercial Chinook fishery in the Stillaguamish. In the Columbia Basin, various salmon fishery constraints and closures have been implemented for decades to protect threatened and endangered salmon populations; roughly nine billion dollars in public funds have further gone to salmon recovery, and a 2023 study found no empirical evidence of an increase in wild fish abundance. Each of those reductions was asked of fisheries operating in or near the rivers where salmon return, on the grounds that there are not enough fish to go around. In stark contrast, the salmon bycatch limits in the groundfish fisheries this Council manages were not reduced, because they are fixed numbers that do not respond to abundance. This presents a major disparity in equity and the burden of management and conservation measures. Groundfish bycatch limits are fixed on the West Coast as well, but not at comparable levels. Under the 2017 biological opinion for the Pacific Coast groundfish fishery, the entire fishery off Washington, Oregon, and California—covering the whiting sector, the non-whiting trawl, and fixed gear sectors together—operates under Chinook salmon guidelines of 11,000 and 5,500 fish with a reserve of 3,500, a total of 20,000, and all groundfish fisheries close when that total is reached. The Gulf of Alaska pollock fisheries alone are allowed 18,316 Chinook salmon in the Central Gulf and 6,683 in the Western Gulf under Amendment 93, against an incidental take statement of 40,000 Chinook salmon in the 2024 biological opinion for Gulf groundfish fisheries. The Bering Sea pollock fishery alone operates under limits of 60,000 and 47,591 Chinook salmon under Amendment 91. Genetic stock composition analysis of Chinook salmon bycatch from the 2018 Gulf of Alaska pollock trawl fishery found that 33 percent of the salmon originated on the West Coast of the United States and 43 percent in British Columbia. West Coast groundfish fishermen are held to a coastwide ceiling of 20,000 Chinook salmon, on runs originating largely in their own states. The Alaska groundfish fisheries taking many of the same fish are held to considerably larger ones. Fisheries that target salmon do adjust to abundance. The Alaska Department of Fish and Game set the 2025 Southeast Alaska all-gear Chinook catch limit at 133,500 fish, which the Department described as the lowest on record, on the basis of poor forecasts for Columbia River summer run and Washington Coast Chinook among others. The mechanism exists and is used every year. I am not asking the Council to set a new Chinook bycatch limit for groundfish fisheries at this meeting. I am asking it to examine whether the current bycatch limits are appropriate relative to the guiding principles of the Magnuson-Stevens Act that promote conservation and equity—and to consider adaptive management of these bycatch limits with salmon abundance. I request that the Council task its staff to: Request that NOAA Fisheries work with the Pacific Fishery Management Council and the Pacific Salmon Commission on a single analysis of the combined effect of all three bodies' decisions on individual salmon runs. Consider new Chinook bycatch limits that can be adaptively managed based upon salmon abundance and cumulative accounting of harvest-related mortality, with special consideration for threatened and endangered populations.