

**RE: D1 Salmon Bycatch: Review a) Salmon findings of State of Alaska Bycatch Taskforce (T); b) Chum salmon bycatch discussion paper; c) Salmon Bycatch Committee Report**

Dear Chairman Keene and NPFMC members: Hello, My name is Jeffrey Kelly. I am contacting the North Pacific Fisheries Management Council because I am a subsistence user very concerned about halibut, salmon, and black cod.. Alaska's fisheries are being threatened by climate change, habitat loss, and management practices that allow waste and excessive harvest. Conservative management actions are necessary immediately in order to mitigate harm. Climate change is driving unprecedented changes and our current management system is too slow to respond to these dynamic changes, amplifying the negative impacts to our community-based fisheries. My comments pertain to item D1: salmon bycatch. Salmon stocks are threatened by overfishing, habitat degradation, and bycatch practices.. Alaska salmon, halibut, and crab populations are showing the stress of climate change and industrial fishing pressures. In the past few years, communities along the Yukon and Kuskokwim Rivers have stopped fishing entirely for subsistence harvest. These communities bear the brunt of conservation measures and depend upon fish for income, food, and the foundation of their culture. The issue of bycatch in federal fisheries is an environmental injustice. Alaska subsistence fishers and small boat direct fishers have foregone multiple fishing seasons due to the declining runs of Chinook and chum salmon. Meanwhile, only the trawl fleet has not faced caps or fishing restrictions. Currently, the pollock trawl fishery harvests a significant number of Chinook and chum salmon originating from these same Western Alaska waters where subsistence harvest has been curtailed. In 2020, the Bering Sea Aleutian Island pollock trawl season resulted in 32,294 Chinook salmon and 320,478 chum salmon taken as bycatch. Of those bycaught salmon, 16,796 Chinook originated from Western Alaska waterbodies. This disproportionate burden of conservation measures on Alaska communities and fishers, who are the most dependent upon salmon, halibut, and crab stocks, contradicts the purpose of the Magnuson-Stevens Act. In regards to Item D1: Salmon bycatch, I urge the NPFMC to implement the following regulatory measures. Prioritize Alaskan communities and user groups over industrial scale trawlers; subsistence use must be prioritized by reducing bycatch limits on the trawl fleet. Chum bycatch limits (prohibited species catch caps) must be established for both the Gulf of Alaska and the Bering Sea/Aleutian Island pollock trawl fisheries. Ecosystem-based management of federally managed fisheries must be implemented to consider all cumulative impacts on the ecosystem, including the impacts of said fishery to the natural environment, Alaska communities and small boat direct target fisheries, and climate change. Implement immediate closure of the pollock trawl fishery harvest when bycatch caps are met, and provide no emergency additional bycatch cap allowances. Implement heavy fines, time and area closures imposed for future fishing seasons if bycatch caps are exceeded by pollock trawl fishers. All trawlers fishing in Alaska waters, including the Gulf of Alaska, should have 100% observer coverage. Research cannot be prioritized over direct and immediate action that reduces carbon emissions, updates fisheries management processes to be more efficient in incorporating the impacts of climate change, and creates a fisheries ecosystem-based management system that is more responsive to the needs of Alaskan communities. Status quo in fisheries management is not an option anymore. Bycatch reductions must be implemented immediately. These comments are intended to be considered for agenda items and decision-making at the December 2022 NPFMC meeting. Thank you for your service on this council. Regards, Jeffrey Kelly 101 Viking Way Sitka, AK 99835