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Chair Angel Drobnica
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Re: Endorsement For IPA modifications in Alternative 4

Dear Madam Chairwoman,

As a representative of Global Seas, a family-owned inshore catcher vessel company, with CDQ Partners, I am writing to share our perspective on the Preliminary Draft Environmental Impact Statement (DEIS) analyzing chum salmon bycatch management in the Bering Sea pollock fishery. These proposed alternatives—no action, hard caps, abundance-based management, Incentive Plan Agreements (IPAs), and corridor (area) closures—bring significant challenges and risks that need to be carefully weighed. As an inshore operator rooted in sustainable practices and community partnerships, we believe the current proposals lack the nuance and adaptability required to balance conservation with economic vitality.

The DEIS begins with Alternative 1, the no-action alternative, which would maintain the status quo. While this alternative avoids the economic and operational disruptions associated with new measures, it does not address the ongoing concerns about bycatch impacts on salmon stocks, including those important to upriver subsistence users. Maintaining the current framework misses an opportunity to refine existing measures to better balance conservation and economic goals.

Alternative 2 proposes hard caps with fixed limits on chum salmon bycatch, based on historical bycatch rates. The DEIS acknowledges that only 18.6% of chum salmon bycatch originates from Western Alaska (WAK) river systems, with annual variability ranging from 9.1% to 24.6%. Indeed, the majority of bycatch stems from Russian and Asian hatchery stocks (p. 17). This alternative also fails to consider the ecological interactions between Russian and Asiatic hatchery chum salmon and WAK chum salmon. By protecting hatchery fish, which increasingly compete with WAK salmon stocks for limited resources, hard caps risk exacerbating the survival challenges faced by WAK chum salmon. Instead of aiding in conservation, such measures could have the inverse effect, protecting hatchery fish while WAK salmon stocks continue to decline. Hard caps, while well-intentioned, fail to account for these disparities. Not only do these measures fail to account for variability or the origin of the fish, but they also threaten premature closure of

the pollock fishery. Such closures would disproportionately affect the inshore sector, creating severe economic consequences for small, family-owned operations and the communities they support.

Alternative 3 introduces abundance-based management, which ties bycatch caps to salmon abundance indices. This approach attempts to account for interannual variability in salmon populations, but its effectiveness depends on the accuracy of abundance forecasts and their correlation with bycatch rates. The DEIS, however, fails to address the variability and broader causes of declining chum salmon runs, such as climate change and ecosystem changes, which contribute significantly to reduced salmon populations. Furthermore, given that a significant portion of chum salmon bycatch originates from Russian and Asiatic hatchery stocks, this alternative overlooks the ecological interaction between hatchery and WAK chum salmon. Hatchery fish increasingly compete with WAK chum salmon for survival, exacerbating the challenges faced by WAK chum stocks. Imposing abundance-based caps risks creating a second crisis for the Alaskan economy and seafood industry by forcing closures that do not reflect the best available science or address the root causes of the declines. The DEIS highlights that abundance-based caps could still lead to frequent closures if abundance thresholds are not met, particularly for sectors with limited operational flexibility. Without robust predictive modeling and real-time monitoring, this alternative risks unintended economic and ecological consequences, particularly for inshore fleets that rely on consistent access to fishing grounds.

Alternative 4 enhances Incentive Plan Agreements (IPAs), which have already demonstrated substantial success in reducing bycatch. From 2021 to 2024, IPAs achieved a 94% reduction in chum salmon bycatch (p. 20), showcasing their effectiveness as a tailored, adaptive, and industry-led solution. Enhancing IPAs with additional provisions such as real-time genetic stock identification (p. 12), expanded vessel outlier protocols (p. 24), and weekly reporting to Western Alaska stakeholders (p. 25) would strengthen their ability to meet conservation goals while minimizing economic disruptions. By leveraging innovation and collaboration, IPAs offer a path forward that balances ecological and economic needs.

Alternative 5 considers corridor (area) closures, establishing seasonal restrictions in high-bycatch corridors. While this approach aims to mitigate bycatch in specific zones, it heavily relies on historical data and fails to anticipate dynamic environmental conditions. The DEIS notes that displaced fishing effort often shifts to adjacent areas, leading to unintended consequences. For instance, when effort moves from Cluster 1 to Cluster 2, chum bycatch rates decrease slightly, but Chinook bycatch rates increase significantly, with averages of 1.92 chum/mt of pollock in Cluster 2 compared to 0.42 chum/mt in Cluster 1 (p. 20-21). Moreover, corridor closures could displace a material portion of the targeted pollock harvest, jeopardizing the economic viability of processing plants and the broader seafood supply chain.

However, from our perspective as an inshore catcher vessel group, corridor closures appear to be aimed at appeasing demands for stricter regulations for the sake of additional regulation without meaningfully addressing the underlying issues — particularly climate change, and the

prevalence of foreign hatchery fish and their competition with WAK chum stocks. By forcing our fleet to fish farther away from historical grounds, corridor closures would diminish our efficiency, increase our carbon footprint, and potentially push us into other high-bycatch areas. In truth, the scientific evidence suggests that more flexible IPAs offer a far better approach to achieving chum salmon bycatch avoidance in a dynamic ecosystem.

The Alaska pollock fishery supports 30,000 jobs nationwide, spanning vessel operations, technical support, seafood processing, distribution, wholesale, retail, and foodservice industries, while facilitating advanced job skills and training. Alaska produces more than half the fish caught in U.S. coastal waters, according to the National Oceanic and Atmospheric Administration, with an average wholesale value of nearly $4.5 billion a year. An April 2024 economic impact report conducted by the Alaska Seafood Marketing Institute stated the seafood industry contributed nearly $6.0 billion in annual economic output to Alaska's economy in 2021/2022 and a total of $2.3 billion in labor income. Pollock represents Alaska's largest volume of commercial fishing at 59% and is second in value (29%) to salmon (40%), which ranks #2 in volume at 16%, according to the ASMI report.

From a larger perspective, the Alaska seafood industry directly employs more than 48,000 workers in Alaska, with the state's seafood harvesting and processing sectors providing jobs to 17,000 Alaskans from over 142 communities in 2021–2022. Moreover, Alaska's seafood industry was the largest source of municipal tax revenue for 11 municipal governments in 2022. These statistics highlight just how pivotal the pollock fishery—and the broader seafood sector—are to sustaining local economies, public services, and community well-being.

This volume effectively subsidizes the processing of other species by offsetting the fixed costs of running these facilities. Without pollock, many plants would be unable to operate, leaving other fisheries without critical infrastructure to deliver and process their harvests. Indeed, shoreside processors are supported by the pollock fishery's value and volume, allowing them to remain open and support smaller fisheries outside the pollock season. If pollock harvests were curtailed or displaced by corridor closures or hard caps, these processors might shutter—leaving fishermen with no viable markets for their catch. This interconnected relationship underscores the foundational role of pollock in supporting Alaska's diverse fisheries.

Alaska is seafood, and Wild Alaskan Pollock is the backbone of Alaska Seafood. By creating conditions that could wrongfully threaten closure of the pollock fishery, we would only be creating a second crisis—without actually doing anything to help the communities that are suffering from declining WAK chum salmon returns.

We empathize deeply with upriver subsistence users whose way of life is profoundly affected by declining salmon returns. Their reliance on healthy salmon runs is a cornerstone of their culture and survival. We strongly support efforts to address the root causes of these declines, such as climate change and the invasion of foreign hatchery salmon onto historically and exclusively WAK chum salmon waters, with solutions grounded in the best available science.

However, creating a second crisis by jeopardizing the pollock fishery risks destabilizing the Alaskan economy and the communities that depend on it, without effectively addressing the underlying issues.

The Alaska pollock fishery is recognized by NOAA and certified by the Responsible Fisheries Management and Marine Stewardship Council as one of the most responsibly managed fisheries globally. It is also one of the most abundant, accounting for 35% of all fish caught by U.S. commercial fisheries. As stewards of both the ocean and the communities we serve, we are committed to sustainable practices that protect fisheries while preserving livelihoods. To meet the Magnuson-Stevens Act's dual mandates of conservation and economic stability, we urge the Council to prioritize enhanced IPAs over blunt tools like hard caps and closures. Let's focus on real-time monitoring, vessel accountability, and innovative bycatch reduction technologies — solutions that work for both fish and people.

The proposed measures in the DEIS lack the depth and adaptability required to address the complex realities of bycatch management. Expanding the proven framework of IPAs offers a balanced, effective path forward. I ask the Council to embrace this opportunity to lead with innovation.

Thank you for your consideration. I welcome the chance to continue this dialogue and work together toward solutions that support conservation and our shared future.

Sincerely,

Philip Michael Powell
General Counsel
Global Seas, LLC