

CITY OF UNALASKA
P. O. Box 610
Unalaska, AK 99685-0610
Tel (907) 581-1251 Fax (907) 581-4469



April 9, 2015

Dan Hull, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

**Re: City of Unalaska Comments
C-4 Bering Sea Salmon Bycatch-Final Action**

Dear Mr. Hull:

The City of Unalaska submits to you the following comments on the issue of C-4 Salmon Bycatch, which is up for final action.

The Eastern Bering Sea Pollock fishery, which is the nation's largest and most valuable fishery, is the economic engine for Unalaska and other fishery dependant communities in Southwest Alaska. Unalaska is a one industry town. The seafood industry, and especially the Pollock fishery, supports all sectors of the community and if the Pollock fishery is impacted it is felt throughout the community, including seafood processing plants, harvesters, marine equipment suppliers, repair shops, the transportation sector and longshoremen. City revenues are also affected, as is the enrollment in our schools. No sector escapes the impacts of a downturn in the Pollock fishery.

The City of Unalaska is very concerned that if the very restrictive Alternative 5 being discussed under C-4 Salmon Bycatch is selected by the Council, it could cause severe harm and potential closures of the Bering Sea Pollock fishery before the Pollock allocations are harvested. We know the impacts and hardships communities in Western Alaska have faced with years of low returns of Chinook salmon, but we are concerned of the potential impacts to the City of Unalaska, and to other fishery dependent communities in Southwest Alaska. We agree that salmon bycatch should be reduced as well as bycatch in all fisheries of the Bering Sea. The City of Unalaska and the seafood industry that we depend on for our livelihood will be directly affected with severe economic consequences if the Council makes takes an overly restrictive approach to salmon bycatch reductions.

The fisheries of the Bering Sea, and especially the Pollock fishery, is critically important to the fishery dependent communities of Southwest Alaska, to the State of Alaska and the nation. The products produced in the Pollock fishery help feed the nation and the world. This fishery certainly sustains Unalaska local economy, almost half of the 14 million dollars in fisheries related local and state shared taxes comes from the Pollock fishery, the above mention taxes provide over 40% of are general fund revenues for the

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City of Unalaska Comments on C-4 Salmon Bycatch

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community, and if sales taxes are added in which are driven by fuel sales to the Bering Sea fishing fleets; well over 60% of the general fund revenues come those two revenue streams. The revenues mentioned above allows us to fund improvements for the quality of life of our citizens. If we are impacted by overly restrictive measures that restrict or close Pollock fisheries before the allocations can be harvested it would be devastating. How would this community and the seafood industry of Unalaska survive, if we lost a Pollock B season which is 60% of the annual Pollock harvest allocation, and provides a major portion of the community's annual revenues, employment in the community, and revenues for the local support sector businesses all would face major impacts if an overly restrictive performance standard and hard cap is chosen.

We would also like to point out that industry efforts through Amendment 91 have greatly reduced salmon bycatch amounts the past few years. The harvesting sectors have developed salmon excluder devices for their trawl gear and the industry developed a monitoring system for the fleet with Sea State, Inc., that alerts the fleet in real time of areas of high bycatch so they can move from those areas and this program also includes voluntary area closures. The harvesters have developed Incentive Plan Agreements and Inter-Coop Agreements with a system that are working well to reduce Chinook and Chum salmon bycatch and the reduced bycatch numbers the past few years prove their efforts are succeeding. These efforts were implemented even though it meant reduced revenues and in many cases increased expenses for the fleets.

We are concerned that the Council will take action on this bycatch issue without the best understanding of the abundance of Chinook salmon in the Bering Sea, various impacts from climate change on the ecosystem, and the fluctuations in abundance, survival, and growth of salmon in the Bering Sea. These issues have all added significant uncertainty to the management of the salmon resources and even with the actions taken to reduce bycatch it may not lead to increased salmon returns to Western Alaska river systems. The analysis states at best a 2% increase to the western Alaska river systems even if the Pollock fishery was totally closed.

In closing, we support a cautious approach as you move forward with this action. The overly restrictive measures in Alternative 5 could severely impact the Pollock fishery and the communities that depend on the Pollock fishery to maintain infrastructure, provide jobs for our residents, and sustain the quality of life of our community. We also face the financial situation with the State of Alaska with a bleak outlook for funding for capital projects, schools, and other programs, which make local revenues from the fishing industry even more important to Unalaska. We ask that you give serious consideration to our concerns as you move forward on this issue.

Sincerely,

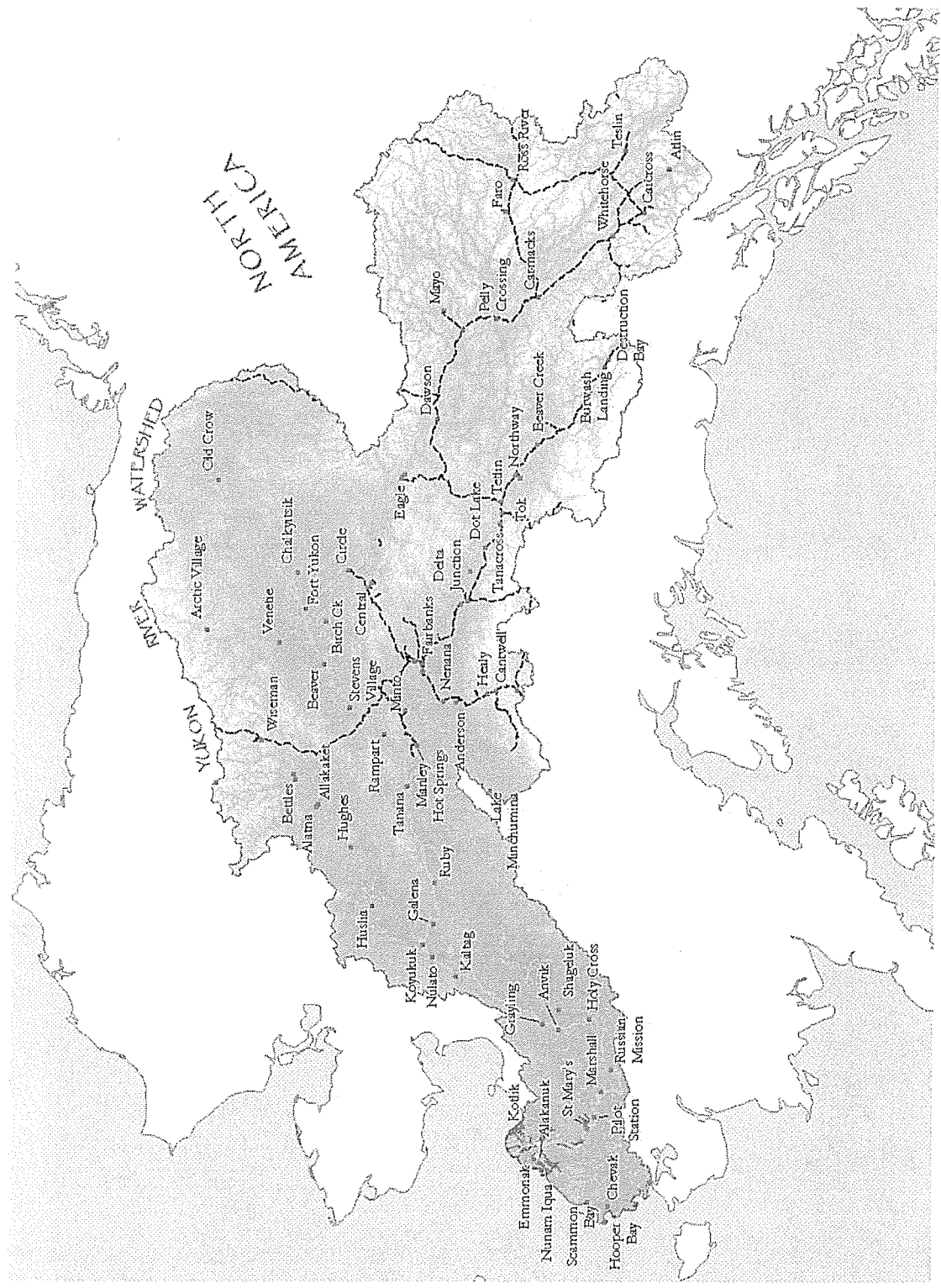
CITY OF UNALASKA

A handwritten signature in black ink, appearing to read 'Frank Kelty', with a long horizontal flourish extending to the right.

Frank Kelty
Natural Resource Analyst

CC: Mayor Marquardt, and the Unalaska City Council
Interim City Manager Don Moore

C4 Percy



Tanana
Chiefs
Conference

*"Stronger Together
for the Next 100 Years"*

CF

Paul Beans
P.O Box 173
Mountain Village, Alaska 99632
PH: 907-591-6005
Email: pbeans2003@yahoo.com

April 8, 2015

I Am Paul Beans from Mountain Village on the Yukon River. I am a member of the Mountain Village Working Group. I am a commercial and subsistence fisherman for most of my adult life on the Yukon. The people in Mountain Village and surrounding villages are concerned about the Chinook salmon that is decreasing seems every year without any sign of building up. We have not fished commercially for Kings since 2007 and due to closures to have them escape to Canada. Every year since 2007 the fish and game estimates that we get shows low or below average for Kings every year and we cannot take them. Yet the Pollock Fishery continues with no hitch or reduction of fishing time. This pounding of the Pollock fishing for six months out of the year, has an effect on the King salmon being able to enter the Terminal Rivers in recent years as bycatch. NPFMC relies mostly on scientists to determine the bycatch that can be taken to have a good escapement, they have not been successful. Reduction of fishing time or shorter seasons might be the answer to increase the escapement so that we can again fish our traditional fishing activities once again for Kings.

I understand this is the final on the King salmon bycatch issue. Make the best of it by reducing the amount of bycatch to a reasonable number so that the Chinook can escape and spawn in the western Alaska Rivers like before. We the people on the Yukon rely on the chinook for subsistence and traditional use. Traditional use of the fishery must be respected by the NPFMC. We do rely on regulations that would help us to sustain our livelihood by subsistence fishing for salmon during the short months. But that respect does run short when there has been no improvement on escapement on our chinooks and we do not fish them. We wonder if we will ever be allowed to fish normally on the Yukon River for salmon. Thanks so much for this opportunity once again.


Paul Beans



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Resolution 2015 - 05

REDUCTION OF CHINOOK AND CHUM SALMON BYCATCH IN THE BERING SEA POLLOCK FISHERY

WHEREAS Chinook salmon and chum salmon are valued for nutritional, cultural and economic survival in our region with chum salmon increasingly important for commercial fisheries and subsistence as Chinook salmon decline; and

WHEREAS dramatically low Chinook runs and harvests in recent years have caused severe impacts to the people in our villages and the Chinook stocks; and

WHEREAS for the first time in history, subsistence fisheries for Chinook salmon on the Yukon and Kuskokwim Rivers were completely closed in 2014; and

WHEREAS commercial Chinook salmon fisheries have been shut down for years on the Yukon and Kuskokwim Rivers, and summer chum salmon fisheries have been limited to protect Chinook salmon; and

WHEREAS minimum amounts necessary for subsistence have not been met on the Yukon River since 2008 and on the Kuskokwim since 2011-2012; and

WHEREAS Chinook salmon federal commercial fishery disasters were declared for the Yukon River for 1997, 1998, 2000-2002 and 2009-2012 and for the Kuskokwim for 2011-2012; and

WHEREAS despite these restrictions the Yukon River Chinook salmon Canadian escapement goal has only been met in 4 out of the last 10 years and mean run size of Canadian-origin Chinook salmon (which comprise approximately 50% of the run) declined 45% for the period 1998-2010 compared to 1982-1997; and

WHEREAS in the Norton Sound during four of the last 6 years, Chinook escapement goals have not been met in the Unalakleet and Shaktoolik Rivers; and

WHEREAS despite subsistence fishing for Chinook being delayed in 2012 and 2013, the subsistence fishing escapement goals for Unalakleet and Shaktoolik rivers were not met; and

WHEREAS there have been no directed Commercial fishing for Chinook in the Unalakleet and Shaktoolik marines waters located in Norton Sound since 2005; and



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WHEREAS the Bering Sea pollock fishery catches these same salmon as bycatch; catching over 122,000 wild Chinook salmon in 2007 and over 700,000 chum salmon in 2005; and

WHEREAS according to the best available scientific information, as much as 73% of the Chinook salmon taken as bycatch are of Western Alaska origin; and

WHEREAS the management measures adopted in April 2009 by the North Pacific Fishery Management Council (the Council) provide for a 47,591 bycatch level in most years, with the potential for the fleet to reach 60,000 in two out of every seven years without consequence; and

WHEREAS although bycatch has remained well below the cap in recent years, the current management regime allows the potential for the pollock fleet to catch as many as 60,000 Chinook salmon as bycatch; and

WHEREAS in these times of severe Chinook salmon declines, all sources of mortality must be reduced and all harvesters of salmon must bear equitably in conserving Chinook salmon; and

THEREFORE BE IT RESOLVED that the Kawerak Board of Directors requests that the North Pacific Fishery Management Council take final action in April 2015 to reduce salmon bycatch. The preferred alternative must include Alternative 5, option 2 (60% reduction to the performance standard) and the suboption to apply the 60% reduction to the overall hard cap. Alternative 2 and Alternative 3, options 1-5, should be selected as well.

BE IT FURTHER RESOLVED that the Kawerak Board of Directors requests that the Bering Sea/Aleutian Islands pollock industry act immediately to set a voluntary limit on Chinook salmon bycatch for 2015 not to exceed 20,000 fish, and take every action possible to reduce bycatch towards zero.

Frank Katchatag
Frank Katchatag, Board Chairman

Certification: I, the undersigned Board Secretary of Kawerak, do hereby certify that the foregoing resolution was adopted by a vote of the Kawerak Board of Directors on April 2nd, 2015 with 23 for, 0 against, and 0 abstentions.

Sharon Sparks
Sharon Sparks, Board Secretary

Testimony to North Pacific Fisheries Management Council-April 9, 2015

Good Afternoon, Mr. Chairman Hall and members of the North Pacific Fisheries Management Council.

My name is Myron P. Naneng, Sr., President of the Association of Village Council Presidents, representing 56 tribes on the Yukon/Kuskokwim Delta.

DOES ONE WAY OF LIFE HAVE TO DIE, SO ANOTHER CAN LIVE? This question still resonates even after the question was asked back in the 1970's from Elders in our villages. And today that question is very much in play after all these years now with our ongoing concerns with the Chinook salmon that we are all trying to help increase to numbers that we can continue to harvest for food and to sustain our livelihood, culture and traditions.

I sat here back in April, 2009 when the first by-catch limit was requested to this Council. This council accepted the 60,000 by-catch limit with the 47,500 and the incentives.

A week after this council took action, Alaska Department of Fish and Game travelled to Fairbanks to announce to the Yukon River fishermen, both commercial and subsistence that there is a conservation concern and subsistence fisheries will have to be limited. The limitation imposed left some villages out completely of any opportunity to even harvest other salmon stocks, especially in the area around Marshall, Russian Mission based on their closures when the Chinook salmon started to migrate into the Yukon River. In June, 2009, fishermen from Marshall went out fishing for food, only to be pursuit by USFWS with citations and one was cited. These village tribal members were only catching a limited number of Chinook salmon, unlike the hundreds that the trawl fleet was catching and throwing overboard as waste. These tribal members were trying to some Chinook salmon to share with the village, when they have not had any fresh salmon when salmon started migrating up the Yukon River.

In 2012, 60 fishermen on the Kuskokwim River were cited for fishing for food. Their nets were confiscated by State of Alaska. This was done to our subsistence fishers while out in the Bering Sea, the trawl fleets continued to have a by-catch allocation, while there was no allocation for food for those who live on the river system. We feel that the management systems have failed us. Our ongoing concerns of the Chinook salmon are

being ignored by this management body, when they should be sharing our concern, yet we continue to beg for action that will help in getting these salmon species to return to our rivers.

Last spring, on May 20, 2014, tribes on the Yukon River, including our villages and as well those in the Tanana Chiefs Conference region and on May 28, 2014, the Kuskokwim River villages imposed a moratorium on Chinook salmon on themselves based on reports of expected low returns to the spawning grounds. 2015 does not look any better in terms of escapement levels. Our people know that Chinook salmon is needed for food security and perpetuation of Chinook salmon stocks is our concern too. We need others to share the burden of conservation as well.

We all know that the Yukon River has a treaty obligation from the US Government, under the Pacific Salmon Treaty. The treaty obligation allows for a certain number of Chinook salmon to cross into the Canada border. The conservation of these Chinook salmon is expected to be the burden of the people who live on the Yukon river and more conservation is placed on them than the trawls fleets of the Bering Sea. Don't we all live in the United States? And doesn't the US Government have control out to the 200 mile limit? Than why is the burden to allow for more the treaty obligation placed primarily on those who live on the river system and have utilized this resource for food. Our Cultural and Traditions are dying, while the trawl fleet continues to have its share by so-called by-catch allocation to push towards endangered species status of the Chinook salmon. Our Yupik, Cupiks and Athabascans might as well be on the ENDANGERED SPECIES LIST AS WELL.

Right now, the effort to conserve the Chinook salmon is being placed primarily on those who live on the coast and river systems in the Y/K delta. If the effort to conserve Chinook salmon is forcing people to fish and concentrate on other salmon, i.e. chums, coho and sockeye, we can anticipate in the very near future restrictions due to the decline of those species. We have a history of chum disasters that occurred in Western Alaska that ran through a cycle, from 1991, 1994, 1997 and 2001. If and when this happens again, who is going to suffer the most and be expected to bear the heaviest burden of conservation of these species decline? I thanks some of the CDQ groups that have stood with us in trying to reduce Chinook bycatch. However, many of the AVCP villages on the Kuskokwim are not CDQ members and receive no benefits from the CDQ.

Our tribes expect some real and meaningful relief through this council, not a token 25% decrease in the performance standard when our Chinook stocks are at their lowest. If our villages can impose upon themselves a moratorium, we expect the trawl fleet to do the same. It is only by working together that we will all gain from our efforts to conserve. Alternative 5 may be considered when the numbers are very low, however, we feel that it does not go far enough. Consideration of limiting or even a moratorium on trawling like they expect those who live on the river to conserve can best help the increase of the Chinook salmon.

WE, AS TRIBES OF THE YUKON/KUSKOKWIM DELTA EXPECT NOAA AND THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL (NPFMC) AS A FEDERAL MANAGEMENT BODY TO CARRY OUT IT TRUST RESPONSIBILITY. IT IS THE FEDERAL GOVERNMENT THAT HAS CREATED THIS PROGRAM. IT IS FEDERAL AGENCIES WHO HAVE THE RESPONSIBILITY TO PROTECT OUR SUBSSITENCE WAY OF LIFE. WE EXPECT NOAA TO FULLY INCLUDE ITS TRUST RESPONSIBILITY IN ANY ACTION IT TAKES. WE EXPECT A WRITTEN REPORT FROM NOAA AFTER THIS MEETING EXPLEAING HOW IT INCLUDED THE TRUST RESPONSIBILITY AND OTHER ISSUES RAISED IN CONSULTATION IN ITS DECISION. PAST NOAA ACTIONS ON THIS COUNCIL HAVE NOT LIVED UP TO ITS TRUST RESPONSIBILITY. TOKEN ACTION BY NOAA WILL BE A FAILURE TO LIVE UP TO ITS RESPONSIBILITY.

WE ARE TIRED OF BEGGING. NO MORE. IT IS FAR PAST TIME FOR THE NPFMC TO TAKE SOME REAL ACTIONS. WE WILL EXERCIZE ALL OUR LEGAL, POLITICAL AND HUMAN RIGHTS TO PROTECT THIS RESOURCE AND OUR WAY OF LIFE.

THANK YOU MR. CHAIRMAN FOR THE OPPORTUNITY TO TESTIFY ON THIS LIFE AND DEATH SITUATION FOR MANY IN OUR VILLAGES.

04-09-15

Thank you MR. Chaik and Council members

My name is Stanislaus Sheppard Born
and raised on the Lower Yukon.

This year has been a very busy one
for me because of having to attend meetings
that all deal with our Salmon.

Every year we on the Yukon River have
to give up King Salmon so they can go into
Canada and other spawning grounds in hope that
more return to fill our subsistence needs.

For years now we have been doing this
and seams like they are coming back just a
little bit more.

IF the bycatch is lowered the salmon
can be more returning into the river.

With all the information gathered please
try and get the hard cap lowered.

Also fishing time for the deep sea the
months of Sept and Oct be cut down because
those are the highest percentage of bycatch that
taken.

Thank you very much
Stan Sheppard
Mtn. Village Working Group



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Frank Katchatag, Board Chairman

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Sharon Sparks
Sharon Sparks, Board Secretary