



March 29, 2024

Angel Drobnica
Chair, NPFMC
1007 West Third, Suite 400
Anchorage, AK 99501

Dear Chair Drobnica & Council members:

Trident Seafoods participates in nearly every fishery in Alaska and we are heavily dependent on our pollock operations to support our statewide footprint. We are proud to have served more than 5400 independent fishermen and crew in 2023, while operating shoreside processing and fleet support facilities across Alaska, including in Aktuan, Dutch Harbor, and Sand Point

1. Trident supports moving forward with this action.

Trident believes in ensuring that the fishing industry, fishing-dependent communities, Tribes, and stakeholders have access to sustainable fisheries and healthy communities. While the pollock fishery is not the driver of the declines of Western Alaska (WAK) chum salmon, we can and should continuously work towards reducing our incidental catch of WAK chum, particularly when subsistence opportunity is limited. We also believe that management measures to reduce WAK chum bycatch should be in line with the level of impact and balanced with the effect that such measures can have on fishing dependent and CDQ communities, fishing businesses, support sectors, and other fisheries that rely on shorebased processing operations in the Aleutians.

To this end, we continue to believe that the measures contained in Alternative 4 represent the most responsive approach to reduce the incidental take of WAK chum and to provide conservation corridors to WAK chum. Fixed caps or fixed time and area closures do not account for changing environmental conditions, changes in hatchery and wild salmon abundance, or variability of pollock fishing effort. Fixed time and area closures likewise provide diminished benefit the further they are implemented from the spawning grounds. In other words, while fixed conservation corridors may be effective in managing in-stream salmon populations, they become less effective when implemented hundreds if not thousands of miles away due to the increasing variables that dictate when and where salmon are present on the pollock fishing grounds.

Current salmon avoidance measures and the additional measures proposed under Alternative 4, by contrast, implement real-time salmon corridors based on windows that reflect when and where chum salmon are found on the grounds. They do so at a vessel level and with a speed that cannot be accomplished through NMFS management. The measures contained in Alternative 4 are more adaptative than traditional management measures, as evidenced by the speed in which the industry implemented chum avoidance measures in 2022 and again in 2023.

2. The current range of options under Alternative 2 is adequate to meet NEPA and MSA obligations.

Due to the predominance of Russian/Asian hatchery chum salmon in the Bering Sea, an overall chum bycatch cap for the pollock sector is unlikely to reduce total WAK chum bycatch and may, as we saw in 2022, push the pollock fleet into areas with low overall chum salmon rates, but with high proportions of WAK chums, leading to an increase in WAK chum incidental catch. Despite this, we recognize the need to consider a range of alternatives under this action, and believe the current options provide a reasonable range of alternatives. However, we would like to see a better description of impacts and potential benefits under this range of options and, for purposes of NEPA analysis, would encourage the Council to consider variations of an overall cap, that may be more targeted and in line with the Council's Purpose and Need.

While we understand that this analysis was scheduled in April for logistical and other reasons, and therefore was put together quickly, with great effort by Council and NMFS staff, the document is lacking in a few areas. The document should include analysis of the benefits and cost of the action, relative to the scale of the problem. The analysis adequately summarizes why some of those costs and benefits are not possible to quantify; however, it makes conclusory statements as to the benefit of the action throughout.¹ Recognizing that there is some logic to these statements – certainly any forgone incidental catch *could* have *some* level of positive impact on the resource – it is almost impossible to get a sense from the document the degree to which that impact may benefit WAK escapement, particularly given the scale of incidental catch in the pollock fishery relative to other known sources of mortality and known escapement.

For example, the analysis should include a discussion on the largest source of fishing mortality – state water salmon fisheries in Bristol Bay, the Yukon/Kuskokwim, Norton Sound, and Kotzebue – as this is important in understanding in the context of what could happen to any chum avoided in the pollock fishery.² Likewise, the analysis does not include the scope of the pollock fishery's incidental WAK chum catch relative to the total *known*³ escapement – which was just 0.6% in 2023 and ~1.5% from 2011-23.

The document also has a very brief and limited analysis on impacts to the shoreside processing sector. For example, in section 6.2.9.1.4, 'Implications of a B Season Closure,' does not describe any operational impacts on shoreside processors, despite the potential for these operations to be significantly impacted under any of the options considered under Alternatives 2 and 3. Shoreside processing in the Aleutians requires enormous upfront operational costs and risk; frequent or unpredictable closures—even for a single season—could cause significant harm to all processing companies and the communities in which they operate. Further, the analysis of impacts to vessels and shoreside plants evaluates impacts of a B season closure in isolation. The economics of processing in

¹ For example, on page 13, the analysis notes that “[t]he Council is considering this action because any additional chum salmon returning to Alaska river systems could increase escapement which is necessary for the long-term sustainability of chum salmon fisheries” based solely on the assumption that any fish not harvested as incidental catch will end up in a WAK river and then contribute to increased spawning potential.”

² In 2023, the pollock fishery represented less than 5% of commercial harvest of CWAK chum salmon, with the largest being Bristol Bay and Kotzebue fisheries.

³ Total known WAK chum includes the combined Yukon and summer fall chum (Pilot Station sonar), Kuskokwim Bethel sonar counts from 2018 onward, Bristol Bay westside (Nushagak & Togiak) catch + escapement, Norton Sound commercial catch, Kotzebue district commercial catch.

such a remote and expensive area means that any impact to B season operations will undermine a company's ability to remain viable for all seasons and markets.⁴

To close, the range of options under Alternative 2 is broad, and the tables in Appendix 5 make clear the significant impact that a cap—even in the high end of the range—could have on all sectors. The fact that a 200,000 chum cap could shut down the inshore Alaska fishery in 10 out of the last 12 years, and the CP sector in 8 of the last 12 years (using an AFA apportionment), suggests that the low end of the range already goes beyond what is practicable, particularly given that the number of Russian chum hatchery releases has increased by 43% over the time period, and that we can expect an increase in warm temperatures— which is the greatest predictive factor year over year of the pollock fleet's overall bycatch of chum⁵—in the future. Beyond the potential impracticability of a low cap, a balancing of impacts relative to the magnitude of the chum catch (less than ~1.5% of *known* WAK escapement on average, and less than 5% of total commercial mortality in 2023), means the current range includes some options that are not balanced between benefit and costs.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shannon Carroll', with a stylized flourish at the end.

Shannon Carroll

⁴ The analysis also mistakenly assumes that vessels and, presumably shoreside plants, can shift focus to the cod trawl fishery; however, this fishery is only operational in the A&B cod seasons and does not overlap with B season pollock.

⁵ The EIS scoping document refers to public comment to this effect, noting that “Chum salmon move up onto the Bering Sea shelf and overlap with the pollock fishery in greater numbers as water temperatures increase. Additionally, chum salmon predation of Age 0 pollock increases when abundance is high, as was the case during the protracted warm phase of 2015-2021.” However, this known issue is not included anywhere in the analysis.