

November 30, 2022

Dear Chairman Kinneen and members of the NPFMC,

Thank you for service on the council, and for all your work on all of these critically important fisheries issues.

The Sitka Advisory Committee to the Alaska Department of Fish and Game is a collection of 17 publicly elected representatives of Fisheries, Wildlife, Subsistence and Conservation interests in the Sitka area. We are made up of a diverse collection of stakeholders, including sport and commercial interests, with a wide range of views represented on our committee. All of our committee members' livelihoods and ways of life are directly connected to the health of our Salmon runs, Halibut, and Sablefish stocks, and our fisheries resources as a whole.

The individuals represented on this committee feel that responsible management of these resources statewide are of paramount importance to our community, and communities across southeast Alaska, as fisheries and tourism are some of the main economic drivers across this region. These stocks are also tremendously important for community resilience and for food security across Alaska.

Sitka is a rural community. Many of us practice subsistence harvesting; we fill our freezers, feed our families on fish, and we enjoy this way of life. Many have trouble with the word *subsistence* because it does not truly describe what it is to live this way, and it does not capture how our communities thrive directly because of that connection to these lands and waters. Salmon are especially culturally important- The indigenous people of this region have relied on these foods and have managed this resource successfully since time immemorial. I will add- also that no method of analysis can ever fully quantify what that means for people here and elsewhere who practice ways of life like this so connected to the fisheries and wildlife resources we depend on.

Please accept these comments in regard to item D1- Salmon Bycatch:

The Sitka Fish & Game Advisory Committee has a long record of supporting resource conservation. In particular we have supported prohibition of groundfish trawling in both Federal and State waters, off of SE Alaska, because of bycatch problems and concerns for seafloor habitat destruction. We collectively felt it was important to weigh in on this topic yet again in an official capacity ahead of this comment deadline as we have many times before.

The Sitka Fish & Game Advisory Committee met Thursday Oct. 21 2021 and unanimously approved the following motion:

*“We favor reducing (**trawl**) halibut by-catch as much as possible as soon as possible. Additionally we feel (**trawl**) by-catch of other species such as salmon, shellfish, and sablefish need to be reduced as much as possible as soon as possible. “*

We unanimously support the most significant possible reductions of allowable bycatch of all species in the Bering Sea and the Gulf of Alaska. We are grateful to the council for their actions in prioritizing coastal rural Alaskans in the fall of 2021, through their decision to reduce Halibut bycatch. Many of us feel that this is still not enough to act quickly enough to prevent the further decline of these populations that is already being witnessed first hand. We also have even greater concerns over our salmon stocks, particularly Chinook salmon. Similar actions must be taken by the council to address all species taken as bycatch, and there should be greater consideration of the impacts to the ecosystem as a whole versus deliberations over one species at a time.

At our most recent meeting Wednesday November 30, 2022- We reaffirmed that position making an additional unanimous motion:

*“We favor reducing (**trawl**) bycatch of ***all species** as much as possible as soon as possible. Additionally we feel (**trawl**) by-catch of species such as halibut, salmon, shellfish, and sablefish need to be reduced as much as possible as soon as possible.”*

The additional language expresses our concerns for all marine life populations within the ecosystem that are being impacted by the habitat destruction and population impacts of the practices of the industrial trawl fleet targeting pollock in both the Bering Sea and the Gulf of Alaska.

We all have heard about the plight of the folks in western Alaska and the disaster of the complete failure of the runs in the Yukon- Kuskokwim region. We, the Sitka AC, stand with all the coastal rural communities from the Pribilofs to southeast- who all have expressed similar concerns over the impacts of these highly efficient and indiscriminate fishing practices that have contributed to the decline of Chinook Salmon and chum Salmon along with all other species taken as bycatch. Between the impacts of the interception of Chinook Salmon in the Gulf and the Bering Sea and the ongoing explosion in Canadian mining development at the headwaters of all of our major mainland salmon systems in southeast Alaska, this resource is under threat from all

sides. Southeast fishermen continue to lose fishing time due to the stocks of concern listings while the trawl fleet, these large scale operations and fisheries interests, continue to take as waste more salmon than our small boat commercial fishermen bring to the market.

It should not be up to the small boat fleet to carry the burden of the trawl fleet's inability to catch their target species without collateral damage. It should not be the burden of coastal rural communities throughout Alaska, particularly the indigenous peoples of the Pribilofs, Aleutians, western Alaska, and the Y-K Delta region to carry the burden of the trawl fleet's inability to catch their target species without collateral damage. To allow these large industrial scale interests to take such a large amount of fish as bycatch, as waste, impacts us all directly in terms of how much of the annual take of these species, (particularly Halibut and King Salmon), is left to spread around amongst the rest of us. In times of low abundance it should not be the people that need this resource the most that should have to pay the price for the industry's wasteful practices.

The Sitka AC would like to see meaningful restrictions placed on the trawl fleet to reduce their interception of so many species of fish and shellfish as bycatch. We would like to see a strong cap placed on Chum Salmon and see a lower cap placed on Chinook Salmon. Our community and our committee along with others statewide were disappointed to see so little action taken at the past June meeting after so much public testimony on this issue. We were disappointed to see the prioritization of protecting industry incentives over helping to get tangible fish in the hands of rural Alaskans. When we get to seeing numbers this low. Every fish counts. **At the very least we would like to see the process initiated to begin to establish these caps.**

Thank you for your time and consideration!

Sincerely,

Heather Bauscher
Chair Sitka Fish & Game Advisory Committee