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March 31, 2023

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Dr. Jon Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

RE: C2 Salmon Bycatch Reports

Dear Chairman Kinneen, Dr. Kurland and Council members:

Ocean Conservancy¹ joins hundreds of Tribes, Alaskans and other NGOs in calling for immediate reductions in chum salmon bycatch in the Bering Sea. At the April 2023 meeting, the Council must move forward quickly and meaningfully to reduce chum salmon bycatch. **As detailed below, we call on the Council to initiate an analysis of measures to reduce chum salmon bycatch in the Eastern Bering Sea pollock fishery. The Council should also start the process of developing new measures to reduce Chinook salmon bycatch.**

Chum and Chinook salmon are essential to the food security and culture of Indigenous people who have been stewards of the Bering Sea region for tens of thousands of years. Salmon play an important role in the ecosystem, connecting both marine and freshwater systems. Despite their cultural, economic and ecological importance, both chum and Chinook salmon stocks in Alaska are declining; many are in a multi-year decline. From 2020-2022, all Western Alaska areas experienced a precipitous decline in chum salmon run sizes, and some chum returns were the lowest on record. Western Alaska Chinook salmon runs in 2020 and 2021 were the poorest observed over the past 40 years, and despite complete closures or substantial restrictions to all directed Chinook salmon harvest, too few salmon returned to Western Alaska in 2021 to meet escapement goals in almost all areas of Western and Interior Alaska. This situation is not getting better; we are in midst of a salmon crisis.

This problem is not limited to Alaska, and several salmon stocks along British Columbia and the Pacific Northwest are either listed as endangered or threatened under the Endangered Species Act (ESA) or

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. Together with our partners, we create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it.

parallel Canadian laws. Research suggests there are multiple stressors driving reduced Chinook and chum salmon survival and productivity, many of which are likely to be exacerbated by climate change in the coming years. Climate change is not an excuse for inaction. To the contrary, bycatch is a known primary anthropogenic stressor that can be controlled and minimized, and it is imperative that the Council comply with its moral and legal obligations to take every action possible to reduce salmon bycatch in this time of crisis.

At this time, the Council should initiate an analysis that evaluates management measures to meaningfully reduce bycatch of Western Alaska chum salmon in the EBS pollock fishery. We support the full suite of alternatives presented by Tribal and subsistence members of the Salmon Bycatch Committee (SBC). In particular, the alternatives should include Bering Sea-wide (overall) and area-specific chum PSC limits that include an option of zero chum salmon bycatch. Both the overall and area-specific cap analyses should be linked to an index of Western Alaska (WAK) chum salmon abundance and the most current genetic data (2011-2022; [Barry et al. 2023](#)). Overall and area-specific PSC limits should evaluate a range of numbers that include values put forward by Western Alaska Tribal representatives in the [March 2023 SBC report](#).

Preliminary genetic data from [Barry et al. 2023](#) presented at the March 2023 Salmon Bycatch Committee suggest that ~21% of chum bycatch during the 2022 B-season were Western Alaska chum; this represents the highest proportion of WAK chum salmon in a time series extending 2011-2022 ([Barry et al. 2023](#)). The long-term average WAK chum genetic proportions 2011-2022 also confirm that WAK is a significant component of chum bycatch, especially in genetic sampling area Clusters 1 and 2. This information reinforces the conclusion that the Council and NMFS must take action to address chum bycatch and reduce inequities for Western Alaska Tribes that face a salmon crisis threatening their food security and culture.

While recent attention has been focused on chum salmon, the Council and agency must also reduce Chinook salmon bycatch. **We therefore recommend that the Council task the SBC with identifying additional ways to reduce Chinook salmon bycatch in the Bering Sea pollock fishery.** Chinook salmon runs continue to decline throughout Western Alaska. If they are not already, those stocks are dangerously approaching sizes that would warrant listing as endangered or threatened. Meanwhile, Chinook bycatch this year (as of March 15, 2023) already exceeds all of 2022 Chinook bycatch ([NMFS 2023](#)). This bycatch presents a grave inequity to the people in the region whose cultures and food security are inextricably linked to salmon and who continue to forego any harvest. The current Chinook PSC limits and performance standards are clearly not responsive to the severely depressed stock status of Chinook salmon, and it is imperative that the Council and agency comply with their legal obligations to adopt measures that meaningfully reduce Chinook salmon bycatch.

NMFS and the Council have ongoing obligations under the Magnuson-Stevens Act to minimize bycatch to the maximum extent practicable, consider effects on fishing communities, ensure sustained participation of fishing communities and, to the extent practicable, minimize adverse economic impacts on such communities. A number of Executive Orders require federal agencies to address environmental justice issues and advance racial equity. Taken together, these legal mandates reinforce the need for the Council and agency to take immediate action to reduce salmon bycatch.

The Bering Sea and Northern Bering Sea are suffering the impacts of cumulative warm years and residual heat in the marine system. Warming trends are predicted to continue and increase in intensity. We are just beginning to understand the implications of rapid environmental change on distribution and productivity for species like crab and salmon as well as the broader impacts these changes will have on food security and culture. Salmon and communities in Western Alaska are in crisis, and the Council must take action now to strengthen ecosystem resilience by reducing bycatch in the Bering Sea pollock fishery.

Thank you for your consideration of our comments and your continued attention to the critical issue of chum and Chinook salmon bycatch.

Sincerely,



Rebecca Robbins Gisclair
Sr. Director, Arctic Programs
Ocean Conservancy



Megan Williams, PhD
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