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June 3, 2022

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

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

## **RE: D1 Bering Sea Salmon Bycatch**

Dear Chairman Kinneen, Dr. Kurland and Council members:

Ocean Conservancy<sup>1</sup> submits the following comments on Bering Sea salmon bycatch. Chinook and chum salmon throughout Western Alaska are in crisis. Reducing Chinook and chum salmon bycatch is of critical importance to the future of salmon and to the people, cultures, marine mammals and others who depend on them. **We ask the Council to make immediate and significant reductions of Bering Sea Aleutian Islands (BSAI) Chinook and chum salmon bycatch.**

Chinook and chum salmon are essential to the food security and culture of the Indigenous people who have stewarded salmon in the region for tens of thousands of years. Chinook and chum salmon also play an important role in the ecosystem, connecting both marine and freshwater ecosystems. Despite their cultural, economic and ecological importance, both Chinook and chum salmon stocks in Alaska are declining; many are in a multi-year decline. Western Alaska Chinook salmon run sizes in 2020 and 2021 were the poorest observed over the past 40 years, and despite complete closures or substantial restrictions to all 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. In 2020 and 2021, all Western Alaska areas also experienced a precipitous decline in chum salmon run sizes, and some were the lowest on record.

In response to this dire situation, directed salmon fisheries have been reduced or completely eliminated in recent years. Subsistence fishermen on the Yukon and Kuskokwim Rivers have lived with significant reductions in Chinook and chum salmon harvest, and there have been no commercial fisheries for Yukon River Chinook salmon for over 11 years. Western Alaska communities are simultaneously dealing with

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<sup>1</sup> 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.

dramatic declines in the chum salmon returns, and chum salmon subsistence fisheries were limited and/or closed in the Yukon and Kuskokwim areas in 2021. This problem is not limited to Alaska, and a number of salmon stocks along British Columbia and the Pacific Northwest are either listed as endangered or threatened under the Endangered Species Act (ESA) or 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. One of the known primary anthropogenic stressors that can be controlled and minimized is bycatch. The Council has taken some actions through the years to reduce salmon bycatch, and the current crisis demands renewed attention and further reductions in bycatch.

### **Chinook Salmon Bycatch**

Chinook salmon bycatch, while greatly reduced from the highs of the early 2000s, remains a problem. Bycatch of western Alaska Chinook salmon was again high in 2020 despite the ongoing population decline. The number of Chinook salmon caught from the Coastal Western Alaska stock (16,796 individuals) was substantially higher than the 10-year average and represented the second highest catch in the last decade. The updated Adult Equivalent (AEQ) and impact rate estimates for Western Alaska and Yukon Chinook salmon in the BSAI pollock fishery increased in 2020 and 2021 due to high bycatch and the predominance of Western Alaska Chinook salmon in BSAI pollock bycatch composition. In a situation where every fish counts, the 2020 removal of an estimated 22,442 Chinook that were destined to return to Coastal Western Alaska, Yukon, North Alaska Peninsula is contrary to notions of both equity and sustainable fisheries management.

The cultural and food security impacts of declining Chinook salmon in Western Alaska communities occur at the river level; however, AEQ and impact rate estimates aggregate multiple stock/river runs to estimate regional impacts (e.g. Western Alaska includes multiple rivers). Thus, in many cases, a low regional impact rate does not mean a specific river or run was not impacted by bycatch. The AEQ analyses cannot fully evaluate localized river depletions associated with bycatch nor can it address the severity of the downstream community impacts. Precautionary management necessitates significant reductions in BSAI Chinook salmon bycatch.

### **Chum Salmon Bycatch**

More than 530,000 chum salmon were caught as bycatch in the BSAI pollock fishery in 2021, which was the second highest number since 1991. This occurred while a chum salmon collapse throughout Western and Interior Alaska, forced subsistence closures and restrictions, as well as commercial chum fishery closures. The combined contribution of the Western Alaska, Upper/Middle Yukon, and Southwestern Alaska reporting groups was approximately 11.9%, which when multiplied by the total bycatch expands to 64,685 caught as bycatch in 2021. And from 2015-2021, an estimated 416,934 chum salmon total were caught as bycatch from the Western Alaska and Upper/Mid Yukon stocks alone. High levels of bycatch and declining chum salmon stock status collectively signal the urgent need to reduce chum salmon bycatch.

As stated in the Chum Impact Assessment Recommendations, there are significant data gaps in chum run reconstruction and age information that will limit short-term impact assessments related to chum salmon

bycatch in Western Alaska. We suggest that the discussion going forward should not focus on estimating a specific impact rate associated with chum salmon bycatch. Instead, the discussion around chum salmon should begin by recognizing that Alaskan Native Tribes are facing a salmon crisis which threatens food security and culture, and the Council and NMFS have the responsibility under the Magnuson-Stevens Act to address inequities for these communities. Finding ways to reduce chum salmon bycatch is essential.

### **Summary**

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. The Endangered Species Act places additional requirements to reduce the impacts on listed stocks. Taken together, these legal mandates reinforce the need for the Council to take additional action to reduce salmon bycatch.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Robbins', is placed over a light gray rectangular background.

Rebecca Robbins Gisclair  
Sr. Director, Arctic Programs