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September 29, 2021

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

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

RE: B-5 Crisis in Salmon Populations and Management

Dear Chairman Kinneen, Dr. Balsiger and Council members:

Ocean Conservancy¹ urges the North Pacific Fishery Management Council (Council) to take immediate action to address the devastating salmon crisis throughout Western Alaska. The Council must take emergency action to reduce Chinook and chum salmon bycatch in the Bering Sea and take the suite of measures outlined below to address the salmon crisis and move towards sustainable and equitable management in the Bering Sea.

Salmon are a key component of culture and critical to food security for Bering Sea Indigenous communities who have been stewards of salmon populations since time immemorial. Salmon are also a key component of the ecosystem. They are a source of forage and prey for other fish and marine mammals, and a key connector between ocean and rivers, bringing marine nutrients to freshwater ecosystems.

In 2021, Chinook salmon returns throughout western Alaska declined sharply. Incredibly low numbers of salmon were seen in all three rivers in the 3-river index (Unalakleet, Yukon and Kuskokwim). In 2021 the 3-river index itself is at 165,000, a shockingly low level which is well below the long-term average run size on the Kuskowkim River alone. In response, subsistence fisheries were once again closed or severely restricted, and commercial fisheries for Chinook salmon were not even a possibility.

Chum salmon are also at crisis levels throughout Western Alaska. In Norton Sound, a 30-year chum salmon crash continues. Chum salmon runs were the lowest on record in both the Yukon River and

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 science-based solutions for a healthy ocean and the wildlife communities that depend on it.

Kuskokwim River. The impacts of the concurrent collapse across salmon species cannot be overstated.

The salmon crisis is occurring in the context of an unprecedented decline in Eastern Bering Sea species and ecosystem productivity with all indicators all pointing to an ecosystem in distress. These physical and biological signals are occurring at all trophic levels. Sea ice extent in the Bering Sea in 2018 and 2019 was at the lowest levels on record and exhibited warming trends not predicted to occur by regional climate models for another 10-15 years.² Multiple crab populations are experiencing dramatic declines, and for the first time in the survey record, a mass mortality event occurred for snow crab; the biomass of important snow crab size categories are at historic lows and likely overfished.³ From May to September 2021, Tribal Organizations reported at least 2,250 dead and dying seabirds from the Bering Strait region, Aleutian Islands and the Gulf of Alaska.⁴ Northern fur seals on St. Paul Island continue to decline, and an estimated 492 gray whales stranded and died along the coastlines of the western United States, Canada and Mexico from 2019 to September 2021.⁵ The Eastern Bering Sea is experiencing rapid changes that outpace species' ability to adapt. Importantly, research suggests that lack of forage and nutritional limitation is occurring for multiple trophic levels across the Eastern Bering Sea.^{5,6,7}

In light of the salmon crisis occurring in the Bering Sea and in the context of the broader ecosystem collapse, it is essential that the Council take coordinated and immediate action. The Council has adopted a series of measures to reduce Chinook and chum salmon bycatch over the years. These measures are demonstrably insufficient. At present, while subsistence fisheries in-river are completely shut down, the Bering Sea pollock fishery is allowed to catch and discard up to 45,000 Chinook salmon and an unlimited number of chum salmon. It is past time to further reduce salmon bycatch in the pollock fishery and to do everything in the Council's power to help recover Western Alaska salmon runs.

The Council must take the bold steps necessary to advance sustainable and equitable management and work in partnership with Alaska Native Tribes, Tribal Organizations and Inter-tribal Fish commissions to conserve salmon resources, salmon communities and interconnected ecosystems. At a minimum the Council should:

- **Take emergency action to reduce Chinook and chum salmon bycatch to zero for the 2022 Bering Sea pollock fishery.**
- **Send a letter to NMFS supporting funding for disaster declarations and research, observation and monitoring by Tribal organizations and co-management organizations.**
- **Ensure Alaska Native Tribes have a meaningful voice in management.**
 1. Write a letter supporting an amendment to the Magnuson-Stevens Act to add two Tribal voting seats to the NPFMC table.

² NOAA 2019. [Unprecedented sea ice loss in 2018 repeated again in 2019.](#)

³ [Snow Crab DRAFT SAFE 2021](#)

⁴ [USFWS 2021. 2021 Alaska Seabird Die-Off Update.](#)

⁵ NMFS 2021. [2019-2021 Gray Whale Unusual Mortality Event along the West Coast and Alaska.](#)

⁶ Takahashi, A., Thiebot, J.B., Will, A., Tsukamoto, S., Merkel, B. and Kitaysky, A., 2021. [Breeding together, wintering an ocean apart: foraging ecology of the northern Bering Sea thick-billed and common murre in years of contrasting sea-ice conditions.](#)

⁷ McHuron, E.A., Luxa, K., Pelland, N.A., Holsman, K., Ream, R., Zeppelin, T. and Sterling, J.T., 2020. [Practical application of a bioenergetic model to inform management of a declining fur seal population and their commercially important prey.](#)

2. Increase Alaska Native Tribal representation on all Council bodies, including the Advisory Panel, Scientific and Statistical Committee, and Plan Teams by designating a seat or seats on each of these bodies.
- **Support and encourage NOAA to initiate Tribal Consultation on the issue of salmon bycatch so that both NOAA and the Council have the best available information.**

These steps are necessary to fulfill obligations under the law as well as the Council's mandate for sustainable management and commitment to ecosystem-based management, which requires adaptive management that responds to crises in a meaningful timeframe. The National Marine Fisheries Service and Council have an ongoing obligation under the Magnuson-Stevens Act to minimize bycatch to the maximum extent practicable. In addition, National Standard 8 requires management and conservation actions to 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.⁸ 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.

Sincerely,



Rebecca Robbins Gisclair
Sr. Director, Arctic Programs

⁸ See Executive Order 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations (Feb. 11, 1994); Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (Jan. 25, 2021).