

750 W. 2nd Avenue
Suite 206
Anchorage, AK 9950



907.258.0224 Telephone
904.258.0223 Facsimile
www.oceanconservancy.org

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

December 2, 2022

RE: D1 Bering Sea Salmon Bycatch

Dear Chairman Kinneen, Dr. Kurland and Council members:

Ocean Conservancy¹ submits the following comments on Bering Sea salmon bycatch. There is a salmon crisis throughout Western Alaska, and we have a moral, ethical and legal obligation to reduce Chinook and chum salmon bycatch in order to ensure the future of salmon and the people, cultures, marine mammals and others who depend on them. **We urge the Council to take immediate action to reduce bycatch of Bering Sea Aleutian Islands (BSAI) chum and Chinook salmon. At this meeting, the Council should take action that sets the stage for rapid implementation of a meaningful cap on chum bycatch and begin a process of re-examining BSAI Chinook salmon PSC limits. The work of the Salmon Bycatch Committee should not delay Council action.**

Chum and Chinook salmon are essential to food security, culture, and economic sustainability for Indigenous people throughout Western Alaska. Salmon play an important role in the ecosystem, connecting both marine and freshwater systems. Both Chinook and chum salmon in Alaska are declining; many stocks are experiencing a multi-year decline. This is the fourth consecutive year in which Western Alaska chum salmon runs have been catastrophically low. In 2021 and 2022, many Western Alaska subsistence fisheries for chum were closed or limited, and 2021 escapement goals were only met for 2 out of 14 runs (Table 4-2, NPFMC December 2022 Discussion Paper). Concurrently, Western Alaska Chinook salmon run sizes in 2020 and 2021 were the lowest observed in the last 40 years. Despite complete closures or substantial restrictions to all Chinook salmon harvest, too few salmon returned to Western Alaska in 2021 to meet Chinook escapement goals in almost all areas.

In response to this dire situation, directed salmon fisheries have been reduced or eliminated in many places. 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 more than 12 years. Salmon declines put the future of communities in Western Alaska at substantial risk.

Chum Salmon Bycatch

Chum salmon bycatch has increased while chum salmon returns are at record low abundance. The data presented in the December 2022 Chum Discussion Paper indicates that chum salmon bycatch has increased

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.

since Amendment 110 was put in place and that, therefore, the current incentive-based system is not sufficient to reduce chum salmon bycatch. Council action is needed to protect chum salmon, and it is critical that measures are put in place now to prevent another year of near-record high chum salmon bycatch. While the Salmon Bycatch Committee considers other management options, the Council should work quickly and expeditiously to implement a cap on chum salmon bycatch.

Chinook Salmon Bycatch

Chinook salmon stocks are experiencing a prolonged decline, and bycatch continues to be a significant problem. From 2011-2020, over 126,000 Chinook salmon from the middle/upper Yukon, Coastal Western Alaska and North Alaska Peninsula stocks were caught as bycatch, and the 2020 bycatch estimate for Western Alaska stocks was the highest in the 10-year time-series (Guthrie et al. 2022). The established Chinook PSC Limit and Performance Standard values are not sufficient to protect Chinook salmon during prolonged periods of low Chinook salmon abundance (i.e. 2006-current), and the pollock fleet continues to take a relatively high number of Western Alaska Chinook salmon. The Council should take a fresh look at the Chinook salmon PSC limits amidst ongoing Chinook declines. In this context, every salmon returning to the river is critical. Improvements in forecasting indicators may also provide additional tools to more closely link PSC limits to forecasted Chinook salmon returns.

For both chum and Chinook salmon, arguments about the genetic composition of the bycatch are not a viable excuse to delay action. From 2011-2021, an average of 19% of chum bycatch caught in the pollock fishery originated in Western Alaska rivers (NPFMC October 2022 Discussion Paper). From 2011-2021, approximately 642,500 northwest Alaska chum were caught as bycatch in the pollock fishery (Barry et al. 2022). The number of Chinook salmon caught from the Coastal Western Alaska stock alone (10,337 in 2020 and 8,381 in 2021) was substantially higher than the 10-year average, and 2020 represented the highest Coastal Western Alaska bycatch in the last decade (Guthrie et al. 2022; NPFMC June 2022 Discussion Paper). These numbers are significant and meaningful in the context of ongoing Chinook and chum salmon declines.

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,



Rebecca Robbins Gisclair
Sr. Director, Arctic Programs