

**Eastern Interior Alaska Subsistence Regional Advisory Council  
c/o U.S. Fish and Wildlife Service  
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02 DEC 2014

Mr. Dan Hull, Chair  
North Pacific Fisheries Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Dear Chairman Hull:

I am writing on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments and recommendations on chum and Chinook salmon bycatch in the Bering Sea/Aleutian Islands commercial pollock fishery for consideration by the North Pacific Fisheries Management Council (NPFMC) under agenda item C-2 its coming December 2014 meeting in Anchorage, Alaska.

The Council is one of 10 Federal Subsistence Regional Advisory Councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Eastern Interior Region. The Council represents subsistence users along the Yukon River and its tributaries from Tanana to the Canadian Border. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions occurring outside the region that may impact subsistence resources critical to Federally qualified subsistence users whom the Council represents.

The Council held a public meeting on October 20-21, 2014, in Fairbanks and discussed the recent Bering Sea salmon bycatch updates in addition to ongoing conservation measures for Chinook salmon management on the Yukon River. The Council interacts directly with two other regional advisory councils that represent the middle and lower Yukon River communities and has collaborated on river-wide Chinook salmon conservation initiatives in conjunction with regional non-profits and Native organizations. In this letter we wish to further unify our efforts and align with the Yukon River Drainage Fisheries Association, Bering Sea Fisherman's Association, Association of Village Council Presidents, Kawerak, Inc. and Tanana Chiefs Conference to request for the NPFMC to:

1. Reduce the overall Chinook salmon bycatch hard cap from 60,000 to 20,000 and the performance standard/cap without incentive programs from 47,591 to 14,500.

2. Enact regulatory provisions to shorten the pollock season (earlier end dates) when Chinook salmon catch rates increase while pollock catch rates decline in late September/October.

The justification for this request has been articulated many times over the past few years in letters by our Council, in testimony and letters submitted to the NPFMC by subsistence users and the regional organizations listed above. The Council and the area residents it represents are deeply concerned about bycatch, because Western Alaska chum and Chinook salmon stocks are essential subsistence resources for people all along the Yukon River drainage. Salmon is a critical subsistence food source and central to culture, community, economy, and way of life for subsistence communities throughout Alaska. As you are aware, Chinook salmon runs have been in drastic decline the past few years, which has caused great hardship for many communities that have not been able to meet their subsistence needs. Current stock population and escapement are so low that any source of mortality will have an impact on recovery efforts.

In response to Chinook declines in recent years, many communities have taken the initiative to limit or completely curtail their subsistence harvest of Chinook salmon in order to help sustain the population for future generations. In 2014, with the lowest returns on record, subsistence fisheries for Chinook were completely restricted throughout Western Alaska. On the Yukon River, all directed harvest of Chinook salmon was closed and subsistence summer chum salmon fishing was severely restricted to avoid any incidental catch of Chinook. Yukon River Chinook salmon escapement treaty obligations with Canada have been a challenge to meet even with very limited harvest in the Alaska Yukon River drainages. Continued extraordinary conservation measures to recover this run are anticipated into the foreseeable future.

Every Chinook salmon counts and all efforts should be made to rebuild and sustain the population for the future. The Council anticipates that a full closure of Yukon River Chinook salmon harvest will be required for the foreseeable future. Bering Sea commercial trawl bycatch of Chinook salmon is not negligible in the overall effects to the long-term sustainability of Western Alaska Chinook salmon. The Council requests that the NPFMC reduce the bycatch cap for Chinook salmon due to ongoing conservation concerns and also strengthen efforts to reduce chum salmon bycatch due to its increased importance for meeting subsistence needs.

It is imperative for conservation efforts that all fisheries share the burden of conservation equally. Western Alaska Chinook salmon stocks have declined dramatically since the NPFMC adopted current Bering Sea bycatch limits under Amendment 91 in 2009. Our communities have curtailed nearly all directed subsistence harvest of Chinook and summer chum salmon to avoid any incidental catch. Under these circumstances, even relatively low Bering Sea bycatch levels are significant. All measures to reduce every source of Chinook salmon mortality are meaningful. Therefore, Bering Sea salmon bycatch should also be further reduced and hard caps lowered.

Mr. Dan Hull, Chair

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We recognize and appreciate the NPFMC initiative to address bycatch through incentive programs and technical measures. However, under the current circumstances, greater protection of the Chinook salmon population is warranted. We urge the NPFMC to take action at this meeting to further contribute to these conservation measures and reduce Bering Sea bycatch to a hard cap of 20,000 Chinook. This step will reduce the potential for severe impacts to Chinook salmon recovery efforts in Western Alaska.

If you have any questions regarding this correspondence, please contact Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management at (907) 786-3358 or [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov).

Thank you for your consideration.

Sincerely,



Sue Entsminger, Chair

cc: Eastern Interior Alaska Subsistence Regional Advisory Council  
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Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
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Administrative Record