



## Alaska Marine Conservation Council

**January 31, 2025**

Ms. Angel Drobica, Chair  
North Pacific Fishery Management Council  
1007 West 3rd Ave., Suite 400  
Anchorage, Alaska 99501

**RE: Agenda Item C2 Chum Salmon Bycatch**

Dear Chair Angel Drobica and Members of the North Pacific Fishery Management Council,

On behalf of the Alaska Marine Conservation Council (AMCC), we appreciate the opportunity to comment on the ongoing efforts to address chum salmon bycatch in the Bering Sea pollock fishery. AMCC is a fishermen-founded and led organization dedicated to supporting sustainable, scientifically-managed fisheries and prosperous fish-first communities across Alaska. Our work highlights the intersection between conservation, healthy and accessible harvest of marine resources, and the integrity of community interest in Alaska's fisheries.

The persistent loss of Western Alaska chum salmon—critically important to subsistence harvest, commercial fishing, and cultural traditions—necessitates an urgent and durable management framework that prioritizes both immediate relief and long-term resilience.

Chum salmon bycatch broadly is a long-standing issue exacerbated by climate shifts in marine ecosystems. No single measure will fully resolve the problem, but a well-structured framework incorporating transparency, a hard cap, and migration corridors can significantly mitigate ongoing harm. These measures should be designed for long-term adaptability while ensuring that conservation objectives are not diluted over time.

### **Key Priorities for Bycatch Management**

#### **1. Transparency in IPA Creation and Bycatch Reporting**

Incentive Plan Agreements (IPAs) must include explicit, enforceable provisions for bycatch avoidance, and the process for IPA development and reporting must be transparent to foster public trust. While the fleet has made efforts to reduce bycatch from historical highs, the regulatory framework must ensure that all sectors remain accountable to the public, to impacted communities, and most importantly, to the real-time status of the stock. We urge the Council to:

- Require that all IPAs detail how historical genetic stock composition data is incorporated into bycatch avoidance strategies.
- Mandate weekly, publicly accessible bycatch reporting, providing clear and up-to-date data in adherence to confidentiality regulations.
- Ensure that IPA provisions, including any migration corridor adjustments, are subject to Council review and open stakeholder input.

## **2. Migration Corridors to Reflect Chum Salmon Distribution**

As part of a whole-ecosystem approach, migration corridors can be a useful tool for reducing bycatch, structured in both IPA provisions and federal regulations. Regulatory language should incorporate flexibility to respond to real-time migration patterns to prevent creating a situation in which fishing pressure is exerted in higher-density areas of chum salmon abundance. We propose:

- Continuing to refine seasonal migration corridors into IPAs with provisions for timely data-driven updates.
- Establishing federal regulations that require time/area closures based on historical peak chum salmon encounters with the flexibility to react to real-time deviations from historic norms.
- Corridor closures in clusters one and two should be applied uniformly across all pollock sectors to prevent effort concentration in high-bycatch areas.
- Rigid migration corridors that do not consider their impact on the whole ecosystem could result in higher levels of bycatch, less adaptive pollock harvest, and more significant negative impacts on sensitive habitats.

## **3. Implementation of a Hard Cap on Chum Salmon Bycatch**

A hard cap on chum salmon bycatch in years of high and low abundance is foundational to the management equation. It should serve as a firm backstop tied to the needs of the chum resource rather than a variable metric tied to pollock catch levels. Under current reporting methods, calculating bycatch caps as a factor of pollock harvest positions bycaught species as a secondary consequence to the target species rather than a critical species of conservation in and of itself. Specifically, we recommend:

- Ensuring caps are set in numbers of salmon rather than as a rate (e.g., per metric ton of pollock caught).
- Establishing a fixed cap reflecting the downward trend in bycatch rates since 2022 rather than a sliding scale tied to pollock harvest.
- Retaining a hard cap even in years of high chum salmon abundance to prevent unsustainable removals.

## **A Whole-Ecosystem Approach**

While developing any management framework, it is essential to consider the checks and balances of the food web and avoid the exercise of identifying a hierarchy within the carefully balanced and ever-changing ecosystem. It is inappropriate to require a choice of winners and losers among coexisting keystone species such as Chinook, crab, herring, and the communities that rely on them rather than prioritizing management that responds holistically.

Due to the complexity of the management dynamics relating to chum salmon bycatch, we believe it is most effective to combine the above elements to provide management tools to respond to changes within the multitude of ecosystems and potential levels of abundance within the Bering Sea.

AMCC remains committed to advocating for science-based, whole-ecosystem-driven solutions that support sustainable fisheries and empower the livelihoods of Alaska's fish-first communities. We urge the Council to take decisive action to advance a regulatory framework that prioritizes salmon conservation and an adaptive and transparent pollock fishery.

Thank you for your consideration, and we look forward to continued engagement on this important issue.

Sincerely,

Michelle Stratton

A handwritten signature in cursive script that reads "Michelle Stratton".

Executive Director

Alaska Marine Conservation Council