



September 29, 2023

Bill Tweit, Vice-Chair  
North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501

Jon Kurland, Regional Director  
NOAA Fisheries, Alaska Region  
PO Box 21688  
Juneau, AK 99802

**Re: B - Inflation Reduction Act Funding and Chinook salmon Three River Index report**

Dear Vice-Chair Tweit, Director Kurland, and Council Members,

Please accept these comments from SalmonState. SalmonState is an Alaska-based effort focused on making sure Alaska remains a place where wild salmon and the people who depend on them thrive. We appreciate the opportunity to offer our comments. The following comments are submitted under “B reports” regarding Inflation Reduction Act funding and the Alaska Department of Fish and Game (“ADFG”) Chinook salmon three river index report.

**I. The restoration of Western Alaska Chinook salmon and the protection of subsistence users and direct target fisheries should be the priority of this Council in setting Chinook salmon Prohibited Species Catch caps.**

Chinook salmon are a keystone species for Western Alaska. The harvest of Chinook salmon on the Yukon and Kuskokwim Rivers and many smaller rivers and tributaries has been a vital part of Alaska Native culture, tradition, way of life, and food security for thousands of years. Subsistence fishers, small boat direct fishery participants, and recreational fishers have all foregone multiple seasons in recent years due to the low number of returning Chinook salmon to these rivers. In these same years, Chinook salmon have been taken as bycatch in fisheries managed by this Council and NMFS. For the past several years SalmonState, other organizations, and Western Alaska communities and individuals have expressed their deep concern regarding the status of Chinook salmon runs in Western Alaska rivers and the direct impact bycatch of Chinook salmon has on those runs. SalmonState and others have implored this Council to further reduce the bycatch of Chinook salmon. The ADFG report, dated September 11, 2023<sup>1</sup>, indicates the Chinook salmon runs for the combined Unalakleet, Upper Yukon, and Kuskokwim Rivers is roughly half of the “low” threshold for setting a “low” Chinook salmon cap for the Bering Sea pollock fishery. The Chinook salmon run sizes have been well below this “low” threshold for several years. This threshold is not adequate to set a Chinook salmon cap, as the bycatch limit for one fish under the threshold is the same as when the runs sizes are almost half of the threshold.

Yet again, SalmonState is gravely concerned with the status of Chinook and chum salmon runs throughout Alaska. Chinook and chum salmon are at a historically low rate of return, resulting in a direct and devastating effect on communities along the Yukon and Kuskowkim Rivers that

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<sup>1</sup> <https://meetings.npfmc.org/CommentReview/DownloadFile?p=d2d66943-4228-4b82-9f98-dc6dcf04b44d.pdf&fileName=B5%20Chinook%20index%202023%20letter%20to%20NMFS.pdf>

depend upon those fish for income, food and a foundation of their culture. Meanwhile, the trawl fleet continues to take these species as bycatch. SalmonState requests that the Council recommend, and NOAA implement, stricter Chinook salmon PSC caps on an Ecosystem-Based Fishery Management approach to alleviate some of the stress to these vital yet struggling salmon populations.

**II. This Council and NMFS should apply for Inflation Reduction Act funding for the development of a comprehensive Programmatic EIS for Bering Sea, Aleutian Islands, and Gulf of Alaska; Tribal Consultation by the Council; and Incorporation of Local Knowledge and Traditional Knowledge.**

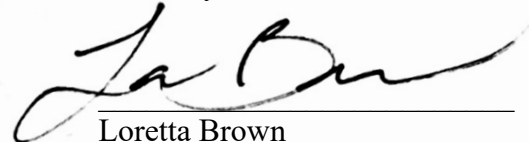
This Council and NMFS have an opportunity to apply for funding designated in the Inflation Reduction Act. SalmonState strongly encourages the Council and NMFS to apply for funding specifically for the following measures:

- Development and completion of a comprehensive NEPA analysis of the North Pacific ecosystems and impacts of federal fisheries management on those ecosystems with the purpose of informing equitable, climate adaptive, and Ecosystem-Based Federal Fishery Management. A comprehensive NEPA review that encompasses the ecosystems within the Bering Sea and Gulf of Alaska would inform necessary updates to federal fisheries management including climate adaptive fishery management, equitable conservation measures for fish population, and scientific information that includes Traditional Ecological Knowledge. The 2004 Programmatic Supplemental EIS and 2015 SIR are narrow in focus, goals, and outcomes, with the NEPA analysis centered around the groundfish fisheries. This single-species and stock has limited applicability and cannot fully inform federal fisheries management decisions as to the ecosystem status and impacts of federal decisions on said ecosystem. Management measures and decisions made by this Council and NMFS for the Bering Sea and Gulf of Alaska federal fisheries are based on these outdated and narrowly focused NEPA documents. This Council and NMFS should prioritize the development of a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska, and funding from IRA can help both the agency and this Council accomplish a robust review.
- This Council should request funding to on-ramp the LKTKS protocol, and inclusion of LKTK and TEK in the development of NEPA analyses and management measures by this Council and NMFS. The inclusion of Local Knowledge, Traditional Knowledge, and Traditional Ecological Knowledge in federal fisheries decision making is vital to the future of fisheries access and sustainable fish populations in the North Pacific. IRA funding can aid this Council and NMFS in the implementation of the LKTKS protocol and better incorporation of TEK in fisheries management measures.
- This Council should request funding for engagement with Alaska Native Tribes and entities through informal and formal Tribal Consultation and provide grant funding for travel and engagement of Tribes and Tribal representatives in Council proceedings. This Council and NMFS should invite Tribal representatives and Indigenous peoples to be an integral part of development of federal fisheries management decisions in the North Pacific. As has been evidenced in the past several years, the decision-making of the NPFMC in managing the Bering Sea and Gulf of Alaska federal fisheries impacts Alaska Native peoples and

communities. Alaska Native coastal communities in Western Alaska are bearing the brunt of the burden of conservation measures due to low fish abundance in species that continue to be bycaught in the Bering Sea and Gulf of Alaska federally managed fisheries. The closure of subsistence and direct target fisheries in Western Alaska have a direct and devastating effect on communities along the Yukon and Kuskokwim Rivers that depend upon those fish for income, food security, and passing on traditions and cultural practices. Decision-making by this Council and NMFS should include early and ongoing Government to Government Consultation with Alaska Native Tribes, and consistent with the Presidential Memorandum on Uniform Standards for Tribal Consultation<sup>2</sup>, as well as incorporation of local and Traditional Ecological Knowledge. We strongly encourage this Council and NMFS to apply for funding from the IRA to conduct robust and meaningful Tribal Consultation and provide grant funding for Tribes and Tribal representatives to participate in the Council process.

Thank you for providing the opportunity to comment to the Council and NMFS.

Sincerely,

A handwritten signature in black ink, appearing to read "Loretta Brown", written over a horizontal line.

Loretta Brown  
Legal and Policy Analyst  
loretta@salmonstate.org

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<sup>2</sup> Ahead of <https://www.whitehouse.gov/briefing-room/statements-releases/2022/11/30/fact-sheet-biden-harris-administration-announces-new-actions-to-support-indian-country-and-native-communities-ahead-of-the-administrations-second-tribal-nations-summit/>