



SalmonState

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Co-Chair
Salmon Bycatch Committee
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Andy Mezirow
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Re: Salmon Bycatch Committee Proposed Purpose and Need and Alternatives to set chum salmon PSC cap for Bering Sea Pollock Fishery

Dear Chairs Baker and Mezirow and Salmon Bycatch Committee members,

SalmonState submits the following comments regarding the Purpose and Need statements and Alternates proposals for setting a chum salmon Prohibited Species Catch cap for the Bering Sea pollock fishery submitted to the Salmon Bycatch Committee. SalmonState has petitioned the North Pacific Fishery Management Council to set a chum salmon PSC cap for the pollock fishery multiple times in the past years and is encouraged the Council is taking steps to do so. We urge this committee and the Council to approach setting a chum salmon PSC cap with a precautionary approach and consideration of the impacts of the pollock fishery on the Bering Sea ecosystem, including other bycaught species, habitat, other fisheries, and communities in addition to western Alaska chum salmon.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

I. SalmonState is Concerned about Western Alaska Fish Populations and the Continued Rates of Bycatch of Salmon, Crab, Halibut and Other Species by the Pollock Fishery.

Coastal Alaska ecosystems are in crisis. The Bering Sea and Gulf of Alaska are reeling from the impacts of climate change. Rising ocean temperatures are altering the marine ecosystem and changing fish species distribution and productivity, leading to a series of cascading impacts to the marine ecosystem and the people who depend on its resources. Western Alaska Chinook and chum salmon runs have significantly declined in the last few years. King crab and snow crab populations have also plummeted. Bycatch of these same species amplifies the impacts of climate change.

Tribal Governments and other salmon organizations have pointed out to the Council that in the past several years the number of chum salmon originating from Alaska waters caught by the pollock fleet as bycatch outstrips the number of chum salmon harvested by subsistence users, direct target small boat fishers, and sport fishers. Additionally, the Western Alaska chum salmon populations have experienced sharp decline in these same years, with a forecast of continued extremely low returns.

II. Chum Salmon PSC Caps Should be Set Through Ecosystem Based Fishery Management and Reflect a Precautionary Approach.

In June of 2022, SalmonState requested of NPFMC, that the Council and NOAA “sets a cap on chum salmon PSC allowable catch that reflects a *precautionary* approach to limit the impact of the trawl fishery on the Western Alaska chum salmon runs.”¹ The November 2022 NPFMC staff discussion paper² made it clear that the Council’s management of chum salmon bycatch through incentive agreements with the pollock fleet has increased rather than decreased the number of chum salmon bycaught in the fishery.

Furthermore, the focus of chum salmon PSC cap without thorough discussion and analysis of the pollock fishery’s impacts on other bycatch species and habitat, including Chinook salmon, squid, herring, crab, and halibut is disingenuous and counter to the purpose and intention of the Magnuson-Stevens Fishery Conservation and Management Act. Pinning and prioritizing one bycaught species against and over others does not get to the root of the problem. Setting PSC caps with a single species focus allows the pollock fishery to continue to take bycatch of all species at an unsustainable level, while keeping a TAC that maximizes and prioritizes the Pollock fleet’s economic gains. Meanwhile, those fisheries targeting bycaught species continue to shoulder the burden of conservation measures for the recovery of their target species.

The status quo in federal fisheries management in the Bering Sea can no longer continue. Alaska Native people along the Kuskokwim and Yukon Rivers rely on subsistence fishing for income, food security, and their culture. These communities are bearing the disproportionate conservation burdens of fishery closures, while the trawl fishery continues to harvest large number of fish from the same natal waters.

As such, this committee should recommend to the Council a Purpose and Need statement and range of Alternatives that impose a chum salmon PSC cap on the Bering Sea pollock fishery to a degree that provides equity in the conservation measures ensuring the Western Alaska chum salmon stocks do not collapse. Additionally, while it is vital that PSC caps are set for these bycaught species, such limits should be based not on a single-species evaluation and prioritization, but on an ecosystem-based evaluation of the Bering Sea and Gulf of Alaska, and equity in shouldering conversation measure across all fisheries.

¹ Emphasis added

² D1 Chum Salmon Bycatch Discussion Paper, November 15, 2022, North Pacific Fishery Management Council and National Marine Fisheries Service, p. 9, <https://meetings.npfmc.org/CommentReview/DownloadFile?p=a06bdc4c-02cd-4fcc-83ac-c775a1f3283d.pdf&fileName=D1b%20Chum%20Salmon%20Bycatch%20Discussion%20Paper.pdf>

III. The NPFMC Should Direct NMFS to Initiate a Comprehensive NEPA Analysis of the Bering Sea and Gulf of Alaska Ecosystems to Establish Ecosystem Based Fishery Management TAC Limits and PSC Caps.

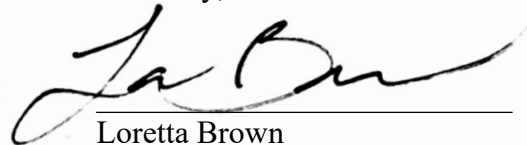
Management of federal fisheries in the Bering Sea and Gulf of Alaska should be conducted through true Ecosystem-Based Fishery Management; including setting TAC limits and PSC caps for bycatch with a comprehensive look at the target fishery's impacts to the whole ecosystem, including other fisheries, communities, and habitat. Such ecosystem management should also balance the economic benefits of target fishery with the economic, cultural, and ecological devastation it causes and exacerbates, rather than giving the target fishery's economic benefits an unbalanced weight.

We urge the Council and NMFS to initiate a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska ecosystems and the pollock trawl fishery's impact on those ecosystems. The current scope of the 2004 Programmatic Supplemental Environmental Impact Statement for Groundfish in the Bering Sea Aleutian Islands and Gulf of Alaska³ is outdated and ignores the severe burdens placed upon Alaska's most dependent fishing participants, Alaska Native people, and coastal communities by the pollock fisheries in both regions. This exercise by the Salmon Bycatch Committee, Advisory Panel, and NPFMC in setting a PSC cap for chum salmon clearly demonstrates the 2004 Groundfish PSEIS is outdated, and non-responsive when conditions change, and urgent action is needed. This committee and the Council should direct NMFS to undertake a NEPA process that looks at the ecosystem in its entirety and creates a framework for climate adaptive and responsive Ecosystem Based Fishery Management for the Bering Sea and Gulf of Alaska.

IV. Conclusion

SalmonState is deeply concerned with the status of fish populations throughout Western Alaska and management decisions enabling wasteful practices by the Bering Sea and Gulf of Alaska pollock trawl fleet. As discussed above, SalmonState supports this committee and the Council establishing a PSC cap for chum salmon. All bycatch measures should reflect an Ecosystem Based Fishery Management approach that prioritizes reducing impacts of bycatch on all species, even if such conservation measures result in reduced pollock landings.

Sincerely,



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³ <https://www.fisheries.noaa.gov/action/alaska-groundfish-programmatic-supplemental-environmental-impact-statement-pseis>