

RLS9



Association of Village Council Presidents



Kawerak, Inc.



Bering Sea Fishermen's Association



March 19, 2013

Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Re: Chinook salmon bycatch

Dear Mr. Johnstone and Board of Fisheries Members:

We are submitting these comments on behalf of the Association of Village Council Presidents, the Bering Sea Fishermen's Association (BSFA), Kawerak and the Yukon River Drainage Fisheries Association (YRDFA). AVCP is a tribal consortium of the fifty-six tribes of the Yukon-Kuskokwim Delta region. BSFA is a non-profit extension service organization serving the needs of Western Alaska commercial and subsistence fishermen. Kawerak is the tribal consortium in the Bering Strait region of Alaska, where there are 20 federally recognized tribes. YRDFA is an association of commercial and subsistence fishers on the Yukon River. **We ask the Board of Fisheries to request that the North Pacific Fishery Management Council (the Council) take action to protect Chinook salmon stocks by significantly reducing the bycatch limit for the Bering Sea pollock fishery.**

As you are well aware, the region our organizations serve is home to some of the world's most magnificent salmon resources. These salmon provide a primary source of food and are essential to

the continued viability of the subsistence way of life in Western Alaska. Salmon represents an essential part of the culture, diet and economy in our region.

Chinook salmon runs have declined throughout the region in past years. Federal fishery disasters have been declared for 2008-2012 for the Yukon and 2011-2012 for the Kuskokwim. On the Yukon, mean run size of Canadian-origin Chinook salmon declined 45% from the period 1998-2010 compared to the period 1982-1997. No directed commercial fisheries have been permitted for Chinook salmon on the Yukon River for many years, and subsistence has been severely restricted. Amounts necessary for subsistence have not been met on the Yukon in 2008-2012. Despite these restrictions, the Canadian escapement goal has only been met in two of the last five years. Similarly, on the Kuskokwim the 2010, 2011 and 2012 runs have been the lowest recorded in 35 years. Commercial Chinook salmon fisheries have been reduced and in 2012 severe restrictions were placed on subsistence fishing. In Norton Sound, Unalakleet River Chinook salmon have been in sustained decline since 1999. There have been no commercial fisheries for Chinook salmon in eastern Norton Sound since 2001, except for a small directed commercial harvest of king salmon in 2005. Combined commercial king salmon harvest for subdistricts 5 and 6 over the recent 5 year period declined 98% from the historical period 1989-1998. Subdistricts 5 and 6 average subsistence harvests for the period 2008-2012 declined 67% from the 1994-1998 average subsistence harvest.

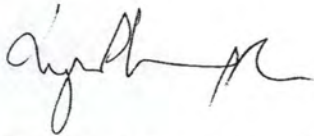
While the causes of these declines are largely unknown, it is clear that Chinook salmon in Western Alaska—and beyond—are in serious trouble. At this point stocks in the Yukon and Kuskowkim are barely replacing themselves, and there are not enough Chinook salmon to meet basic subsistence needs. Both the Board of Fisheries and Alaska Department of Fish and Game have had to restrict subsistence and commercial fisheries to try to meet escapement goals. In the current context of low Chinook salmon abundance we are deeply concerned about the potential impacts of Chinook salmon bycatch in the Bering Sea pollock fishery on our Chinook salmon stocks. While bycatch has been reduced in recent years from previous levels, the possibility remains that the pollock fleet could catch up to the 60,000 cap permitted by the North Pacific Fishery Management Council (the Council) under Amendment 91. According to the most recent (2010) genetic stock identification information, as much as 73% of the Chinook salmon taken as bycatch in the Bering Sea pollock fishery are of Western Alaska origin.¹ Under the current Chinook salmon conditions, that amount of bycatch could have significant impacts on Western Alaska stocks. With the low levels of Chinook salmon currently returning to our rivers, a year of bycatch of 60,000 fish would severely impact meeting escapement goals and would cause additional restrictions to in-river fisheries.

¹ Guthrie, C. M. III, H. T. Nguyen, and J. R. Guyon. 2012. Genetic stock composition analysis of Chinook salmon bycatch samples from the 2010 Bering Sea trawl fisheries. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-232.

The Board of Fisheries has taken action over the last several AYK cycles to restrict subsistence and commercial fishing to protect Chinook salmon runs. It is supremely inequitable that while subsistence fishers in-river sacrifice their very ability to feed themselves in efforts to rebuild the Chinook salmon stocks, the pollock fishery has the opportunity to catch these very same fish.

Given the dire condition of our Chinook salmon stocks, we ask that you request that the Council take action to protect Chinook salmon stocks by significantly reducing the bycatch limit for the Bering Sea pollock fishery.

Sincerely,



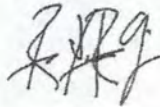
Myron P. Naneng, Sr., President
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Karen Gillis, Executive Director
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