RC 80

Suggested Language for Draft Letter re: Salmon Bycatch
From the Board of Fisheries to the North Pacific Fishery Management Council

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This is draft language we would suggest for a letter from the Board of Fisheries to the North Pacific Fishery Management Council regarding reducing Chinook salmon bycatch limits in the Bering Sea and Gulf of Alaska.

March 13, 2013

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Dear Chairman Olson and members of the Council:

We are writing regarding Chinook salmon bycatch in the Bering Sea and Gulf of Alaska pollock fisheries. As you are well aware, the Board of Fisheries is responsible for managing the fishery resources in the waters of the State of Alaska, including salmon fisheries. We appreciate the actions the Council has taken to set limits on Chinook salmon bycatch in both the Bering Sea and Gulf of Alaska (GOA) pollock fisheries. However, we remain concerned that these limits are set too high for a time of such low Chinook salmon abundance to adequately protect struggling stocks and we are very concerned that no limit is currently in place on the GOA non-pollock fisheries.

The Board has followed the issue of Chinook salmon bycatch for many years and has received considerable public comment about the impacts on salmon and salmon fisheries. In April 2009, when the Council was considering a cap for the Bering Sea pollock fishery for the first time, the Board recommended the Council adopt a hard cap of 32,482 Chinook salmon, which represented the 10-year average bycatch prior to 2002 when the Yukon River Salmon Agreement was signed. Instead, the Council adopted a management system under Amendment 91 which allows the pollock fishery to catch up to 60,000 Chinook salmon in two out of any seven years without penalty, with a performance standard of 47,591 Chinook salmon and industry incentive plan agreements. In June 2011, the Council also adopted a limit for the Gulf of Alaska pollock fishery, set at 25,000 fish.

Chinook salmon bycatch in the Bering Sea has decreased from the all-time high in 2007 of over 122,000 Chinook salmon and in recent years has remained well below the current caps. However, since the Council took action in 2009, Chinook salmon runs throughout Western Alaska have declined severely, and Chinook salmon in the Gulf of Alaska have experienced steep declines as well. In the Gulf of Alaska, in the two years since the cap was put in place bycatch has been lower than the 2010 high of 44,000 fish, but has remained high. In 2012 the Western Gulf of Alaska even exceeded its Chinook salmon bycatch limit. The Board is concerned that given the current state of Chinook salmon stocks throughout the state, the levels of Chinook salmon bycatch permitted at present are likely to threaten Chinook salmon stock recovery and may result in reduced available harvests to directed salmon fisheries.

The current status of Chinook salmon stocks throughout Alaska today is not a rosy tale. Federal fishery disasters have been declared for 2008-2012 for the Yukon River, 2011-2012 for the Kuskokwim River, and 2012 for Cook Inlet. Nine Chinook salmon stocks throughout the state are currently listed as Stocks of Concern by the Alaska Board of Fisheries.[1] Because of the poor returns, the State of Alaska has had to impose restrictions on commercial, subsistence and sport fishing. No directed commercial harvest of Chinook salmon has been allowed on the Yukon River or Norton Sound for many years now, and in 2012 harvest was restricted on the Kuskokwim as well. On the Yukon River, subsistence fishing opportunity has been significantly reduced, and at our January 2013 AYK meeting the Board put a closure on the first pulse of fish into regulation to facilitate stock recovery. In Cook Inlet, the set net fishery was almost completely closed in 2012, and the Kenai River was closed to all recreational Chinook salmon fishing for part of the season.

These same Chinook salmon are caught as bycatch in both the Bering Sea pollock and Gulf of Alaska groundfish fisheries. 2010 genetic stock identification information indicates that as much as 73% of the Chinook salmon taken as bycatch in the Bering Sea pollock fishery are of Western Alaska origin.[2] Current sampling and stock identification information in the GOA, from our understanding, is not sufficient to determine stock of origin information, but we do know that Gulf of Alaska stocks are present in the bycatch.

Given the current state of Chinook salmon runs throughout Alaska, we ask that the Council:

1. Significantly reduce the Chinook salmon bycatch limit for the Bering Sea pollock fishery.
2. Adopt a Chinook salmon bycatch limit for the Gulf of Alaska non-pollock fisheries of 5,000 fish, which is only slightly lower than the 10-year average bycatch in this fishery.
3. Significantly reduce the Chinook salmon bycatch limit for the Gulf of Alaska pollock fishery via the Gulf of Alaska trawl bycatch management program which the Council is currently developing.

Our recommendations are based on the statewide declines in Chinook salmon and the concurrent reductions in harvest to subsistence, commercial and sport fisheries. The Board and the Alaska Department of Fish and Game has been faced with many difficult decisions as we struggle to provide harvest opportunity while meeting escapement goals and providing an opportunity for Chinook salmon runs to recover. **We ask for your partnership in protecting Alaska's Chinook salmon runs by adopting meaningful limits on bycatch in Bering Sea and Gulf of Alaska groundfish fisheries.**

Thank you for your attention to this matter.

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[1] Chinook salmon stocks currently listed as stocks of concern include: Chuitna River, Theodore River, Lewis River, Alexander Creek, Willow Creek, Goose Creek, Karluk River Chinook, Yukon River and Norton Sound Sub-district 5 & 6.

[2] 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.