

I have significant concerns with the North Pacific Fisheries Management Council's (Council) February 2018 C3 agenda item, which proposes to increase Chinook PSC limits for the GOA trawl fisheries.

I am asking that the BOF request the Council not move forward with any agenda item that increases the take of Southeast Alaska Chinook. Even small numbers of the affected stocks are relevant to our ability to meet escapement goals and provide for the future sustainability of the resource. In addition, the BOF has had to impose difficult and costly restrictions on Southeast Alaska Chinook fishermen. If the NPFMC moves forward with revisiting Chinook Prohibited Species Catch (PSC) limits, I ask the BOF request that the Council also consider an alternative that responds to Alaska's Sustainable Salmon Policy by reducing take in the pollock fishery to 15,000 Chinook and non-pollock fishery take to 5,000 Chinook as considered in previous NPFMC analyses. Also, given the uncertainty in the NMFS's bycatch estimates, the NPFMC should prioritize Chinook in its monitoring programs.

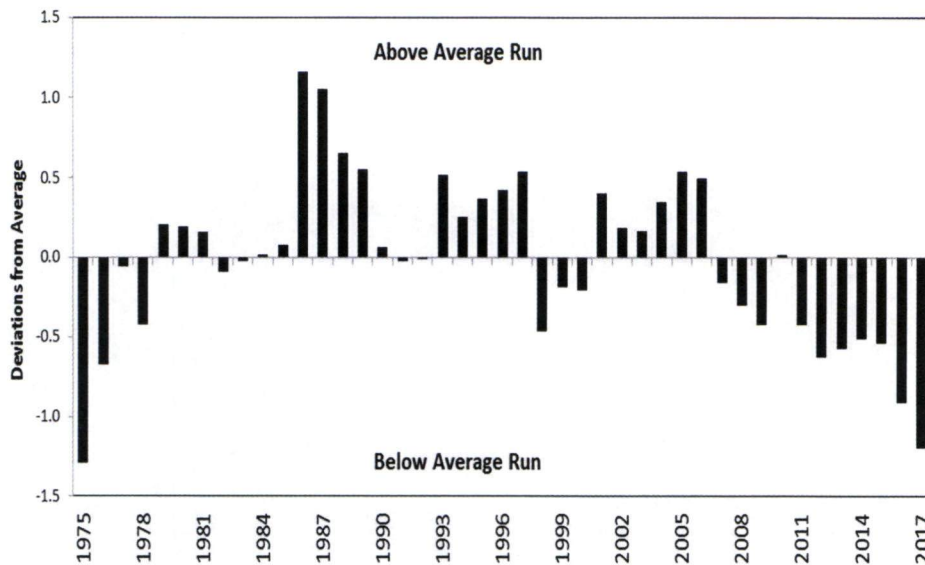
The deadline for written comments is 5:00 pm (AST) on Friday, February 2, 2018. Comments can be submitted [here](#)

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The North Pacific Fishery Management Council (Council) established a Chinook Prohibited Species Catch (PSC) limit of 25,000 fish for the pollock fishery in 2012. At that time, most southeast Alaska Chinook stocks were attaining escapement goals.

In 2014, the Council established a 7,500 PSC limit for the non-pollock trawl fishery, in large part to respond to concerns about impacts on dwindling Chinook populations in other Gulf of Alaska (GOA) systems.

Since that time, there has been a [serious decline](#) in Southeast Alaska Chinook populations. Escapements in 2016 and 2017 were the worst on record; nine of eleven indicator stocks failed to meet escapement goals.



In Southeast Alaska, the poor production is at unprecedented low levels. (11 Indicator Stocks in Southeast Alaska), ADFG<sup>1</sup>

The Alaska Department of Fish and Game issued unprecedented Chinook fishery restrictions and closures in 2017 for commercial and sport directed fisheries.

The BOF designated three Chinook and one sockeye stock as Stocks of Management Concern under Alaska’s [Sustainable Salmon Policy](#) at their October work session. Stocks of Concern Action Plans were developed at the Southeast-Yakutat finfish meeting in January 2018 meeting and additional restrictions were imposed on commercial and sport fisheries.

- Add list of actions taken at this meeting including subsistence??

National Marine Fisheries Service (NMFS) analyses of previous Chinook PSC catch limits have recognized the Sustainable Salmon Policy, which requires fishery managers to prioritize the attainment of escapement goals.

NMFS 2015 study of Chinook salmon bycatch in the trawl fisheries indicated that 14 percent of the Chinook taken in the pollock trawl fishery originated in Southeast Alaska.<sup>1</sup> Five percent of the Chinook taken in the non-pollock trawl

<sup>1</sup> [Genetic Stock Composition Analysis of Chinook Salmon Bycatch Samples from the 2015 Gulf of Alaska Trawl Fisheries](#). C.M. Guthrie, III, et al., NMFS, January 2017

fishery originated in Southeast Alaska. In addition, stocks categorized in the study as “NE GOA” include stocks of SE Alaska origin.

Southeast salmon stocks are subject to a fishery management [plan](#) under the North Pacific Fishery Management Council.

The Pacific Salmon Treaty requires that SEAK fisheries be managed to achieve escapement objectives for Southeast Alaska and Transboundary River Chinook stocks.<sup>2</sup>

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<sup>2</sup> [Pacific Salmon Treaty](#), p.90.