March 31, 2023

Mr. Simon Kinneen

Chair, North Pacific Fishery Management Council

1007 West Third Ave., Suite 400

L92 Building, 4th floor

Anchorage, Alaska 99501-2252

**Re: April 2023––C2: Salmon Bycatch Reports**

Dear Chair Kinneen and Members of the Council,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) provides the following comments on agenda item C2: Salmon Bycatch Reports, heard at the April 2023 North Pacific Fishery Management Council (Council) meeting. KRITFC represents the 33 federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, and works to protect and sustain our Kuskokwim salmon fisheries and traditional ways of life using both Traditional/Indigenous Knowledge and the best available Western science.

The multi-year Chinook, chum, and coho salmon declines on the Kuskokwim River and throughout Western and Interior Alaska are threatening the food security, cultural continuity, and well-being of our Indigenous and rural communities. There are few words that can capture the grief, anxiety, and hunger caused by severe closures of our subsistence and commercial fisheries, but it suffices to say the shocking loss of salmon is palpable throughout our communities. For more information, data, and testimony about these declines on the Kuskokwim River, we point the Council to read our “2022 Kuskokwim River Salmon Situation Report,” which can be found at [www.kuskosalmon.org/documents](http://www.kuskosalmon.org/documents).

Of the many factors cumulatively affecting Western and Interior Alaskan salmon, one is within this Council’s control: the prohibited species catch (PSC) bycatch of Chinook and chum salmon by the Eastern Bering Sea pollock fleet. Despite Chinook salmon PSC management measures, and because of the absence of any limits on chum salmon PSC, the bycatch of these species is much higher than can be sustained by Western Alaska stocks. Across time, about or more than half of all Chinook salmon PSC by Bering Sea pollock vessels is of Western Alaska origin, and already the amount of Chinook salmon PSC in 2023 has surpassed that of the previous year. Moreover, recent preliminary salmon genetics analyses suggest that roughly 21% of chum salmon PSC in 2022 was of Western Alaska origin, which is both on par with trends from 2011-2020 despite the rise of Asian origin hatchery fish production *and* significant given the catastrophic collapses of Western Alaska chum stocks since 2020.

There is nothing more that in-river subsistence-dependent communities can do to shoulder the burden of conserving salmon stocks to meet spawner escapement goals and the harvest needs of our present and future generations. KRITFC thus urges the Council and NOAA Fisheries to act now, with everything in your power, to conserve salmon in their marine environment and, consequently, work to protect and restore our subsistence way of life in Western and Interior Alaska.[[1]](#footnote-1)

Specifically, **KRITFC asks the Council to adopt the purpose and need statement for chum salmon management action as passed with consensus by the Salmon Bycatch Committee on March 21, 2023; and to initiate an analysis of alternatives for regulatory chum salmon management measures.** We emphasize that any action the Council chooses to consider should be regulatory in nature, as the non-regulatory, industry-led chum salmon avoidance efforts have thus far been ineffective in meaningfully curbing chum salmon PSC across time. We also ask that the Council include analyses of all PSC limit numbers carried forward by the Salmon Bycatch Committee, including a PSC limit of 0 chum salmon. Although there was and will not be consensus about this PSC limit, Tribes and subsistence-dependent communities have been calling for an end to the waste of Western Alaska chum salmon for years. We implore the Council to respond to our pleas by analyzing this option.

Additionally, we urge the Council to encourage the pollock industry to incorporate **real-time genetic analysis of salmon PSC** as part of a suite of salmon avoidance measures. Technology to implement in-season genetic analysis is or will soon be available, and it will undoubtedly inform the pollock industry of areas with high concentrations of Western Alaska chum and Chinook salmon, allowing their fleet to move and reduce bycatch of these stocks––our common goal.

Furthermore, **KRITFC asks the Council to task the Salmon Bycatch Committee with reviewing and revitalizing Chinook salmon management measures.** The Salmon Bycatch Committee comprises a diverse array of Tribal, subsistence, and industry representatives, and we encourage the Council to lean into this forum to find ways to improve Chinook salmon avoidance.

Quyana, Tsen’ahn,

 

Dr. Michael Williams Sr. Kevin Whitworth

Chair, KRITFC Executive Director, KRITFC

1. KRITFC has heard the Council and NOAA Fisheries state that they do not hold a responsibility to protect or provide for our Alaska Native ways of life, specifically related to subsistence salmon fishing, as salmon species are managed by the Alaska Department of Fish & Game. KRITFC would like to remind these entities that (1) The federal government, including NOAA Fisheries, has a trust responsibility to consult with Tribes and consider management impacts to Tribal traditional ways of life (*See* NOAA Procedures for Government-to-Government Consultation With Federally Recognized Indian Tribes and Alaska Native Corporations, 2013). Moreover, though salmon and salmon fisheries are jurisdictionally managed by the State of Alaska, most species spend the majority of their lives in the marine North Pacific ecosystem, overseen by the Council and NOAA Fisheries. Supporting the health and restoration of salmon stocks in the marine environment by actively managing commercial fisheries to avoid salmon bycatch and accounting for climate and ecosystem changes affecting salmon in the North Pacific is thus a key responsibility of the Council and NOAA Fisheries, if only to collaborate with communities and the State of Alaska to provide for adequate salmon escapement and amounts reasonably necessary for subsistence harvests. [↑](#footnote-ref-1)