

Outreach Report

Summary of outreach on proposed action to limit non-Chinook (chum) salmon bycatch in the Bering Sea pollock fishery

June 2011

Genesis for outreach plan

As a result of one of the North Pacific Fishery Management Council's (Council) policy priorities, it is focusing on improving outreach and communications with rural stakeholders and developing a method for systematic documentation of Alaska Native and community participation in the development of fishery management actions.¹ Upon review of several suggestions to expand both ongoing communication and outreach specific to particular projects,² the Council initiated a small workgroup to further review potential approaches and provide recommendations. Upon review of the workgroup report in February 2009, the Council approved the workgroup's primary recommendation to initiate a standing committee (the Rural Community Outreach Committee) to provide input to the Council on ways to improve outreach to communities and Alaska Native entities. The committee has three primary tasks: 1) to advise the Council on how to provide opportunities for better understanding and participation from Native Alaska and rural communities; 2) to provide feedback on community impacts sections of specific analyses; and 3) to provide recommendations regarding which proposed Council actions need a specific outreach plan and prioritize multiple actions when necessary. The committee was initiated in June 2009.

In addition to the stated Council policy priority, the need to improve the stakeholder participation process was highlighted during development of the Chinook salmon bycatch analysis. The Council made efforts to solicit and obtain input on the proposed action from Alaska Natives, rural communities, and other affected stakeholders. This outreach effort, specific to Chinook salmon bycatch management, dovetailed with the Council's overall community and Alaska Native stakeholder participation policy.

The Council's Rural Community Outreach Committee met in August 2009 and recommended that the non-Chinook (chum)³ salmon bycatch issue be a priority for rural outreach. The Council agreed with this recommendation, to undertake an outreach effort with affected community and Native stakeholders prior to and during the development of the draft EA/RIR/IRFA (analysis), prior to final Council action. The committee met again in November 2009, with the primary purpose of helping to develop an outreach plan for this issue, given that the Council was scheduled to review the chum bycatch alternatives at its December 2009 meeting. Note that in October, the Council's Salmon Bycatch Workgroup also recommended that outreach begin prior to approval of the final alternatives. Both the workgroup and November committee report are on the Council website. The Rural Community Outreach Committee met again in February 2010, in part to review and finalize the outreach plan.

The outreach plan for chum salmon bycatch management was developed by Council staff with input from NMFS, the Council, the Rural Community Outreach Committee, and affected stakeholders. It is intended to improve the Council's decision-making processes on the proposed action, as well as enable the Council to maintain ongoing and proactive relations with Alaska Native and rural communities. Another of the objectives of the plan is to coordinate with NMFS' tribal consultation activities, to prevent a duplication

¹This policy priority is identified in the Council's workplan resulting from the Programmatic SEIS.

²http://www.fakr.noaa.gov/npfmc/Tasking/community_stakeholder.pdf

³While the proposed action would regulate all non-Chinook salmon bycatch, including sockeye, coho, pink, and chum salmon, chum salmon comprises over 99.6% of the total catch in this category. Thus, the proposed action is commonly referred to as the chum salmon bycatch issue.

of efforts between the Council and NMFS, which includes not confusing the public with divergent processes or providing inconsistent information. The entire outreach plan is provided here: http://www.fakr.noaa.gov/npfmc/current_issues/bycatch/ChumOutreach1210.pdf.

This report will be included, in part or in whole, in the analysis submitted to the Council prior to its final recommendation. A broad overview of the primary steps of and results from the chum salmon bycatch outreach plan follows.

Outreach components

The following sections outline the general components of the outreach plan for the proposed action on chum salmon bycatch in the Bering Sea pollock fisheries. These include: direct mailings to stakeholders; community outreach meetings; additional outreach (statewide teleconference, radio/newspaper, press releases); and documentation of rural outreach meeting results.

Note also that NMFS undertook scoping for the alternatives in late March 2009, and the scoping report was provided to the Council in June 2009. Through the notice of intent, NMFS notified the public that a NEPA analysis and decision-making process for the proposed action has been initiated so that interested or affected people may participate and contribute to the final decision. Scoping is accomplished through written communications and consultations with agency officials, interested members of the public and organizations, Alaska Native representatives, and State and local governments. The formal scoping period began with the publication of a Notice of Intent in the *Federal Register* on January 8, 2009 (74 FR 798). Public comments were due to NMFS by March 23, 2009. In the Notice of Intent, NMFS requested written comments from the public on the range of alternatives to be analyzed and on the environmental, social, and economic issues to be considered in the analysis.

The scoping report summarizes the comments received during the January 8, 2009 to March 23, 2009, scoping period, and summarizes the issues associated with the proposed action and describes alternative management measures raised in public comment during the scoping process. The purpose of the report is to inform the Council and the public of the results of scoping and to assist in the development of the range alternatives and analysis. NMFS received four written comments from the public and interested parties. (Appendix 1 to the Scoping Report contains copies of the comments.) The NMFS Alaska Region web site contains the notice of intent, the scoping report, and related additional information.⁴

Direct mailings to stakeholders

On September 18, 2009, the Council provided a mailing to over 600 stakeholders, including community governments, regional and village Native corporations, regional non-profit Native corporations, tribal entities, Federal Subsistence Regional Advisory Council coordinators, Community Development Quota corporations, ADF&G Regional Coordinators, and other community or Native entities. The mailing was also sent to previous contacts or individuals that have contacted the Council on salmon bycatch issues, and State legislature and Congressional representatives.

The mailing included a two-page flyer for potential posting in communities. It provided a brief summary of the issue, including bycatch trends, and solicited input from stakeholders identified as being potentially affected by the proposed action. It also provided a summary of the Council's schedule on this issue, methods of contacting the Council, and a website reference to the current suite of alternatives and options. The flyer was intended to inform individuals and communities as to the current stage of the process that the Council was undertaking in December 2009 (i.e., refining alternatives and options and establishing a

⁴http://www.fakr.noaa.gov/sustainablefisheries/bycatch/salmon/non_chinook/default.htm.

timeline for analysis). In addition, the flyer noted that pending Council direction in December, it is likely that an outreach plan will be developed for the proposed action, which would likely include regional outreach meetings in rural Alaska, in order to explain the proposed action, provide preliminary analysis, and receive feedback from rural communities.

The Council sent a letter and another mailing to the same group of stakeholders March 31, 2010, to notify the public of the May 4 Statewide teleconference and the scheduled action for the June 2010 Council meeting. The Council was scheduled to conduct a final review and possible revision of the proposed alternatives and options for analysis at the June meeting. The intent of the mailing was to ensure awareness of the current Council schedule, the suite of proposed alternatives, the statewide teleconference, and to solicit feedback on the alternatives and options to be analyzed.

Finally, the Council sent a third mailing in May 2011 to the same group of stakeholders prior to the Council meeting at which initial review is scheduled (June 2011, in Nome). The intent of this mailing was to ensure awareness of the suite of alternatives, the range of impacts analyzed, the schedule for final action, and to solicit input on the selection of a preliminary preferred alternative, should one be selected.

In addition, the draft analysis (EA/RIR/IRFA), associated documents, outreach materials, and powerpoint presentations, are posted on the Council website as available, and prior to the Council's scheduled meeting for final action. In addition, the Council newsletter reports upon progress and relevant meetings. The public is also able to listen to all Council meetings real-time via the internet if they cannot attend in person. The Council will also consider a follow-up mailing to potentially affected entities as to the results of the Council's final recommendation for chum salmon bycatch reduction measures to the Secretary of Commerce, if, at that point, the website and Council newsletter are not considered sufficient means to reach potentially affected stakeholders.

Statewide teleconference (May 2010)

In order to get feedback prior to the Council's suite of alternatives, staff conducted a statewide teleconference on May 4, 2010. The primary purpose was an orientation for the public, such that people understand the basics of the alternatives proposed and ways to provide formal input to the Council (e.g., written and oral testimony), prior to the June 2010 Council meeting. A secondary purpose of the call is to document public input on the suite of alternatives, which was provided to the Council in June 2010. A short presentation was provided on the proposed action and Council process, and using most of the time for questions and concerns from the public.

Other guidance that staff followed, as suggested by the Rural Community Outreach Committee, included:

- Limit the call to 2 - 3 hours.
- Clearly articulate the purpose of the call.
- Provide a 2 or 3 minute time limit for questions.
- Provide a mailing/flyer to the list of community and Native contacts that includes: the suite of alternatives; the schedule for action, including community outreach meetings; information on the teleconference; and notice that those who RSVP with the Council that they will attend the teleconference will have the first priority for asking questions.
- In addition to the RSVP list, attempt to take questions from a broad geographic range.
- Work with regional organizations to provide hub sites, where many community members could call in together. Examples provided: Kawerak in Nome, Northwest Arctic Borough in Kotzebue, AVCP in Bethel, Unalakleet.
- Make the powerpoint presentation available on the Council website prior to the call.
- Use a phone line without a limit on the number of callers that can participate.

- Close the call with a reminder of how to participate in the Council process, and the opportunity to provide formal input to the Council in late May/June.

The presentation provided by Council staff during the teleconference is posted here: http://www.fakr.noaa.gov/npfmc/current_issues/bycatch/chumPPT410.pdf. The audio recording of the teleconference is provided here: <http://www.box.net/shared/j37fjq8i1>. The report on the teleconference is attached as **Appendix 1**, which includes the public comments provided, staff presentation, call log, and the public notice for the teleconference.

Community outreach meetings (late 2010 – early 2011)

An important component of the outreach plan was to conduct outreach on the issue in remote villages that depend heavily on salmon for subsistence. Transportation and access to Council meetings by residents of communities in western and interior Alaska is costly and difficult. The outreach plan intended to schedule outreach in various villages, regional hubs and otherwise, in order to promote two-way communication between Council members, staff, and subsistence, recreational, and commercial salmon users. The outreach was intended to help the Council understand the concerns and needs of these communities, facilitate revision of the analysis in accordance with new information, and provide information to residents on the proposed action and Council process such that they may comment and participate in a meaningful way.

Upon informal consultation with community and Native coordinators, as well as the Rural Community Outreach Committee, staff determined that the most effective approach to community outreach meetings is to work with established community representatives and Native entities within the affected regions and attend annual or recurring regional meetings, in order to reach a broad group of stakeholders in the affected areas. Working with established entities which have regular in-region meetings tends to reach more stakeholders than if the Council hosted its own outreach meeting in the community. It was determined that Council staff would convene individual outreach meetings only as necessary and appropriate, if a regional or Council meeting was not scheduled in a particular area during a timeframe in which Council staff and/or members could attend sufficiently prior to final action.

Staff scheduled outreach in rural Alaska in order to correspond with regularly scheduled regional meetings and the release of a preliminary analysis, but prior to the release and Council review of the first formal initial review draft impact analysis (June 2011) and selection of a preferred alternative. The intent was to allow the public time to review and provide comments early in the process, such that changes can be made prior to completion of the final analysis, and allow the Council to receive community input prior to its selection of a preferred alternative.

With regard to outreach meetings, Council staff consulted with the coordinators of five of the Federal Subsistence Regional Advisory Councils (RACs), the Association of Village Council Presidents (AVCP), the Tanana Chiefs Conference (TCC), the Yukon River Drainage Fisheries Association (YRDFA), Kawerak, Inc., and the Yukon River Panel, in order to evaluate the potential for time on the agendas of their annual or biannual regional meetings. There was a recognized conflict between the AVCP annual meeting October 5 – 7, 2010, in Bethel, and the Council meeting October 4 – 12, in Anchorage, so staff and Council members were unable to attend the October AVCP meeting.⁵ A schedule conflict with another outreach meeting also prevented staff from attending the Seward Peninsula RAC meeting in Nome (February 15 – 16). However, the June 2011 Council meeting is scheduled in Nome, which will provide ample agenda time for this issue and public comment. In addition, NMFS staff attended the

⁵The AVCP represents 56 tribes in the Yukon-Kuskokwim Delta.

Bering Strait regional conference in Nome in February and provided the Council presentation; Council staff did not attend due to weather.

In sum, the outreach schedule included attending seven regional meetings, and at least two meetings with the Yukon River Panel in Anchorage. Through coordination with the meeting sponsors, Council staff was allocated agenda time to discuss the chum salmon bycatch proposed action at each of the following public meetings.

Yukon River Panel	April and Dec 6 – 9, 2010; Anchorage
Yukon River Drainage Fisheries Assn annual meeting	Feb 14 – 17, 2011; Mountain Village
Bering Strait Regional Conference	Feb 22 – 24, 2011; Nome
Yukon-Kuskokwim Delta Regional Advisory Council	Feb 23 – 24, 2011; Mountain Village
Western Interior Regional Advisory Council	March 1 – 2, 2011; Galena
Eastern Interior Regional Advisory Council	March 3 – 4, 2011; Fairbanks
Bristol Bay Regional Advisory Council	March 9 – 10, 2011; Naknek
Tanana Chiefs Conference annual meeting	Mar 15 – 19, 2011; Fairbanks

Each of the above organizations represents an area that encompasses several member villages and/or tribes. While it is recognized that there is some overlap in representation between the various entities, the participants that attend the meetings may be very different. However, all of the groups represent rural communities, most of which are small in population and removed from the road system. Kawerak, Inc., organizes the Bering Strait Regional Conference, and is a regional consortium of tribal governments organized as a nonprofit corporation with headquarters in Nome, Alaska. Kawerak provides services to 20 Native villages located on or near the Bering Straits. The Yukon-Kuskokwim Delta RAC represents 42 villages in its management area. The Eastern Interior RAC represents 13 villages along the Yukon or Tanana Rivers and an additional 17 villages within the region. The Western Interior RAC represents 27 villages along the Yukon and Kuskokwim Rivers. The Bristol Bay RAC represents 31 Bristol Bay subsistence communities. The Tanana Chiefs Conference is a tribal consortium of 42 villages in interior Alaska, along the Yukon, Tanana, and Kuskokwim Rivers. Please refer to the maps provided in **Appendix 2** to see the geographic representation of these entities.

Two Council members and two Council staff analysts attended a portion of each regional meeting, with the exception of the Bering Straits Regional Conference, to which weather prevented attendance. NMFS staff also attended the Bering Straits Regional Conference and the Tanana Chiefs Conference annual meeting. At each meeting, Council staff provided a 30 to 45 minute presentation on the Council process, outreach efforts, a review of the Council's previous action on Bering Sea Chinook salmon bycatch, and the proposed action on chum salmon bycatch reduction measures. Council members and staff were then available to answer questions.

In addition, Council staff provided a presentation of the proposed action at the Yukon River Panel meeting in April 2010, and again in December 2010 in Anchorage. The Yukon River Panel is an international advisory body established under the Yukon River Salmon Agreement⁶ for the conservation, management, restoration, and harvest sharing of Canadian-origin salmon between the U.S. and Canada. Three Council staff members attended the December meeting and responded to questions on both the Bering Sea chum salmon bycatch action and the proposed action on Chinook salmon bycatch reduction measures in the GOA pollock fishery.

⁶This agreement constitutes Chapter 8 of the Pacific Salmon Treaty: www.psc.org/pubs/treaty.pdf.

Documenting Results

This summary report was prepared to document the outreach process and results of the regional meetings and statewide teleconference. This report will be presented to the Council, in conjunction with the initial review draft analysis, in June 2011, when the Council is scheduled to review that analysis and could select a preliminary preferred alternative if desired. As stated previously, this report will also be included in the final analysis submitted to the Secretary of Commerce after the Council selects a final preferred alternative.

Council staff documented comments provided at the regional meetings, including public testimony.⁷ A short summary of each meeting is provided below, as a brief reference. Note that the dates provided below refer to the date on which the Council presentation and comments occurred, recognizing that each meeting was typically two to three days. Resolutions or motions on the issue resulting from these meetings are provided as **Appendix 3**.

Yukon River Drainage Fisheries Association annual meeting; February 15, 2011, Mountain Village

The YRDFA Board of Directors is comprised of 30 members from Yukon River communities that represent the various fishing districts, including: Alakanuk, Kotlik, Mountain Village, St. Mary's, Holy Cross, Galena, Kaltag, Tanana, Minto, Nenana, Huslia, Eagle, Scammon Bay, Marshall, Anvik, Nulato, Allakaket, Fort Yukon, Whitehorse, and Haines Junction. The Board is representative of subsistence, commercial, and sportfish salmon users, and processors, and YRDFA has members along the entire Yukon River drainage, which encompasses more than 50 communities. In addition to YRDFA Board members and staff,

The YRDFA Board was concerned with the very limited recent Yukon River fall chum salmon runs. Members emphasized that there seems to be a correlation between high bycatch and the number of salmon returning to the rivers; but that when a species natural productivity is low, even low bycatch years can exacerbate the problem. Thus, there needs to be an effort and incentives to reduce bycatch in both high and low years.

Similar to other regions, the Board was concerned with the 'waste' associated with salmon bycatch, and the need to retain chum and Chinook bycatch as food. The Board pressed for efforts to figure out how to retain more salmon bycatch of a food-grade quality for distribution to village residents in western Alaska. Others related the difficulty in maintaining subsistence fishing, given the high price of gas and the limited fishing windows (e.g., burning 25 gallons per 24-hour window, and harvesting much fewer, smaller, salmon). Members emphasized that this type of information, and the cultural importance and dependence on salmon as the mainstay of the village diet, should be included in the impact analysis.

Members were concerned with subsistence users, both western Alaska residents and tribal members, not being heard in the Council process. Several members noted that tribes and tribal members have their own questions and concerns that need to be addressed, and that there should be a priority to start and continue a dialogue between the tribes and the Council. A direct, consistent relationship, and the ability to have this type of one-on-one communication, is essential. One member stated that the hope is that the salmon stocks will start increasing, and that the Council and YRDFA need to show each other that they are engaged in meaningful efforts to facilitate a rebound. Mandatory, year-round closure areas were mentioned by multiple members as an approach the Council should take.

⁷In addition, all of the Federal Subsistence RAC meetings are recorded and transcribed.

The Board also had many specific questions about the way the pollock fishery operates, the seasons, the number of vessels in the various sectors, the status of salmon excluder devices, observer coverage, monitoring and enforcement of the provision of Amendment 91, and the differences between the timing of Chinook and chum bycatch in the Bering Sea. They also wanted a summary of the effectiveness of the current voluntary rolling hotspot closure system, as many residents along the river have varying perspectives and have heard conflicting information.

Public comment was also taken – two people testified on the importance of chum salmon to the communities in the region and Alaska Native culture.

Bering Strait Regional Conference; February 23, 2011; Nome

This conference was organized by Kawerak, Inc. and brought together residents of 20 villages in the Norton Sound region to discuss education, health care, and natural resource issues. Due to weather, Council staff was unable to get to Nome, so NMFS (Sally Bibb, AKR) participated in the panel discussion on resource issues in their place, and presented an overview of the Council process, the chum salmon bycatch analysis, and the Northern Bering Sea Research Plan to approximately 75 people. Conference participants made the following comments: (1) Norton Sound is one of the areas hit hardest by poor chum salmon returns and is the only area of the state that has Tier II management for subsistence fishing for chum salmon, (2) the hard cap for Chinook salmon implemented under BSAI Amendment 91 is too high and represents a level of bycatch that is above the actual bycatch levels of most of the last 20 years, (3) the Seward Peninsula Federal Subsistence Regional Advisory Council recommended a hard cap of 30,000 chum salmon for the Bering Sea pollock fishery, which is a cap level that currently is not included in the Council's range of alternatives, and (4) trawling should not be allowed in the Northern Bering Sea Research Area because of the sensitivity of the shallow bottom and the importance of the resources in this area to the people of Norton Sound.

NMFS AKR also manned a table at the conference with Protected Resources, Alaska Fisheries Science Center, and US Fish and Wildlife Service staff to have one-on-one conversations with conference attendees and to answer questions about protected resources and fisheries management issues. Most people stopping by the table were interested in marine mammal issues, specifically walrus and ice seals, although several people reiterated the comments that they made relevant to the panel presentation.

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council; February 23, 2011, Mountain Village

The Yukon-Kuskokwim Delta RAC is comprised of 12 members, from the communities of Kalskag, Kwethluk, Tuluksak, Eek, Tuntutuliak, Bethel, Alakanuk, Pilot Station, Kotlik, Hooper Bay, and Mountain Village. Approximately 40 people attended, including State and Federal agency staff and local residents. The discussion included both Chinook and chum salmon bycatch. The majority of the discussion on chum salmon was about accounting reliability, salmon discards and retention requirements, and the potential to use more chum bycatch for food through the food bank system. The RAC requested further information on the Sea Share program and the percentage of salmon bycatch that is retained for food through that program. The RAC was very concerned with whether discards of salmon were occurring, and the general reliability of the observer and catch accounting information.

Western Interior Subsistence Regional Advisory Council; March 2, 2011, Galena

The Western Interior RAC meeting attendees included RAC members, State and Federal agency staff, YRDFA staff, and community members (estimate of 60 total participants). The region the RAC represents encompasses 27 villages along the Yukon and Kuskokwim rivers, and the 10 RAC members are from McGrath, Ruby, Aniak, Galena, Wiseman, Allakaket, Holy Cross, Anvik, and Huslia.

The RAC asked how a hard cap system is different from an allocation of salmon bycatch, and asked what types of incentives are in place to keep the pollock fleet from fishing up to the cap every year. It was later discussed that the Council should focus on disincentives to catching salmon as bycatch, as opposed to incentives. One disincentive could be requiring the retention, freezing, and distribution of salmon bycatch to Western Alaska communities and tribal councils, for both genetic sampling and food. The RAC conveyed that there needs to be strong disincentives to reduce the destruction and waste of such an important food source. Members also discussed the substitutability of salmon species: if subsistence users must give up Chinook salmon to bycatch or other factors, (fall) chum salmon becomes increasingly important to mid – to upper Yukon River communities. At the same time, it was noted that additional salmon in the food bank provides limited benefits; it does not help meet annual or long-term escapement goals. Members emphasized the vulnerability of the salmon stocks; in a year that escapement goals are not met, it lowers the productivity of the river for many years.

The RAC also wanted an explanation of how the Council balances the national standards of minimizing bycatch (e.g., of salmon) and achieving optimum yield (e.g., in the pollock fishery). There were questions about how flexible each Council may be in interpreting the national standards, and whether any priority system or guidance is formalized. The RAC also questioned the need to maximize pollock catch, and whether there is an inherent problem with not meeting optimum yield.

The RAC strongly recommended that additional funding for new genetics data be provided for salmon stocks of concern, in order to better delineate stock of origin. Specific stocks mentioned were the Norton Sound and Chukchi chum salmon stocks. This spurred discussion of the current state of the genetics data and how refined the analysis will be in terms of breaking out (bycatch) stocks by river system.

In terms of alternatives, RAC members stated that a shorter pollock season is a feasible alternative that should be included for consideration, since the fleet is on the water for 9+ months of the year. While bycatch in the pollock fishery is not the only contributing factor to lower salmon returns, the Council should consider a management strategy to reduce the fishing pressure for a period during the year, since salmon spend so much of their life cycle in marine waters. A similar alternative was recommended by the RAC for consideration under the Chinook salmon bycatch reduction measures, but was not included by the Council for analysis.

Ethics issues and appointments were also discussed, as RAC members asked about the current composition of the Council and the perception that it is skewed toward the trawl industry. Staff reviewed the representation of the currently appointed members of the Council and reiterated the appointment process and terms. The RAC was interested in who to contact regarding having a seat on the Council that represents subsistence and tribal issues.

The agenda item closed with a resolution to work with YRDF, tribes, and communities to develop a position on the chum salmon bycatch issue prior to or during the June 2011 Council meeting. In addition, the RAC approved sending a member to attend the June 2011 Council meeting.

Eastern Interior Subsistence Regional Advisory Council; March 3, 2011, Fairbanks

The Eastern Interior RAC is comprised of 12 members, from the communities of Eagle, Tok, Tanana, Fort Yukon, Central, Manley Hot Springs, North Pole, and Venetie. The Eastern Interior RAC meeting was comprised primarily of RAC members and State and Federal agency staff, with a few community members and non-profit groups represented (estimate of 60 total participants). The Eastern Interior RAC represents thirteen villages along the Yukon or Tanana rivers and an additional seventeen villages within the region.

Overall, the RAC emphasized the severe dependence in the Upper Yukon on chum salmon, both to provide food for local residents and to support dog teams for transportation.

The Eastern Interior RAC was very concerned with the level and preciseness of genetics data, and asked for further explanation of the new ‘census approach’ to sampling under BSAI Amendment 91, compared to the previous system of sub-sampling of catch. There were detailed questions about how the sampling is done, and whether otoliths are used for genetic sampling, to determine the level of hatchery salmon in the bycatch. Staff committed to researching and responding to this question after the meeting.⁸

The RAC also questioned whether the Bering Sea pollock fleet is generally able to catch the entire pollock TAC; discussion ensued about this being the first year of implementation for Amendment 91 and that the fleet stood-down for about the first 10 days of the A season in an effort to avoid Chinook salmon. Members were concerned with the significant increase in the pollock TAC in 2011 and possible ramifications relative to bycatch. They questioned whether they should assume a higher TAC means that the fleet will be fishing longer. The response and discussion centered on the concept that a higher TAC does not necessarily mean higher bycatch or bycatch rates. The pollock TAC is higher as a result of increased pollock abundance resulting from the annual stock assessment; in effect, it may reduce the need to prospect for pollock, and allow the pollock fleet an opportunity to look for better, cleaner fishing grounds. The pollock seasons would not be affected, and it is uncertain whether the duration of the fishery would change. The RAC also asked for an update on the research and use of salmon excluder devices.

At the close of the agenda item, the RAC related concerns with the length of time it takes to have a management action implemented. From the time a problem is identified (such as salmon bycatch) to a solution being implemented, it can take 3 to 4 years. Members asked whether the Council has discussed the possibility of reducing the Federal requirements associated with its analytical process (i.e., NEPA) and made recommendations to that end to the Federal government. The RAC stated appreciation for the face-to-face dialogue with Council members and staff, and reiterated the need to continue to strengthen a working relationship.

Bristol Bay Subsistence Regional Advisory Council; March 9, 2011, Naknek

The Bristol Bay RAC is comprised of 10 members, from the communities of Togiak, Naknek, King Salmon, Chignik Lake, Dillingham, Manokotak, and Iliamna. The Bristol Bay RAC meeting was comprised primarily of RAC members and Federal agency staff, with a few public participants and one ADF&G staff person (estimate of 25 total participants). The Bristol Bay RAC represents 31 Bristol Bay subsistence communities and rural residents.

Regarding Chinook salmon measures, the RAC emphasized the importance of Chinook salmon as a subsistence food and noted lower returns (and smaller fish) in their region. They asked on what the existing (performance) cap of 47,591 Chinook salmon was based under Amendment 91. For chum salmon, one RAC member noted that hard caps should be targeted (more restrictive) during the months in which the data indicate that a higher proportion of the bycatch is salmon originating from western Alaska river systems (e.g., under Alternative 3).

The RAC also supported requiring that bycaught salmon is received, stored, and donated in a condition fit for human consumption, and wanted the industry to make progress on providing the infrastructure for distribution to rural Alaska residents in areas that are experiencing very low salmon returns. One member noted that salmon not fit for human consumption could still be used to feed dog teams. The requirement

⁸The response was provided from Diana Stram, Council staff, to KJ Mushovic, coordinator for the EI RAC, USFWS, via email on April 20, 2011.

to count and then discard salmon is counter-intuitive to the concept of not wasting salmon under any abundance conditions. Like the Western Interior RAC, the Bristol Bay RAC emphasized the need for disincentives to encounter salmon (i.e., the cost of retaining, freezing, storing, and distributing to food banks) as opposed to incentives for cleaner fishing. Like other RACs, the Bristol Bay RAC requested the specific amount and percentage of salmon bycatch that is currently processed and distributed to food banks.

The RAC was also interested in the areas identified for closure under Alternative 3, specifically, what years were used to identify those areas (2003 – 2010), and whether a more restrictive trigger cap could be established for specific months to avoid more western Alaska bound chum salmon. They also asked whether it is typically the majority of the fleet that operates in those high bycatch areas or just a few vessels, and whether the closures identified for each month represent a 40%, 50%, or 60% reduction in historical bycatch for each month, across the entire B season, or both.

The RAC emphasized that the Council and analysis should recognize that while the genetic data limit the analysis to impacts on river systems on an aggregate basis (e.g., western Alaska; upper and middle Yukon River), there are some very small, vulnerable streams whose relatively small runs are crucial to various subsistence communities. The example provided was the Naknek River: the entire Chinook run may be 5,000 fish, but this is a very important food source to many tribes and communities in the Bristol Bay region. A similar situation exists for chum salmon. The RAC was interested in how impacts on subsistence users would be addressed in the analysis, and whether other potential pollock trawl impacts, such as on marine mammal species and habitat, would be addressed.

Public testimony was taken; one person (WWF) testified that the RAC should recommend a hard cap on chum salmon bycatch in the Bering Sea pollock fisheries. This testimony also provided notice of a roundtable discussion with tribal leaders being scheduled for June 2011 in Nome, during the Council meeting, in order to increase tribal consultation and participation in the Federal fisheries management process. This notice was also distributed at the other RAC meetings attended by Council staff.

Tanana Chiefs Conference annual convention; March 14, 2011, Fairbanks

The Tanana Chiefs Conference is a tribal consortium of 42 villages in interior Alaska, along the Yukon, Tanana, and Kuskokwim Rivers. Their annual delegate and board of directors meeting was March 14 – 17, in Fairbanks, and the Council presentation was provided under the ‘subsistence issues’ agenda item. About 250 people attended, including the 42 delegates from each of the member villages. After the presentation, a question and answer period was provided for an hour for all attendees.

Overall, participants at the TCC convention emphasized the need to be treated fairly and to participate in the development of fisheries management plans and policies. This participation must be based on meaningful consultation and communication between Federal agencies, the TCC, and Alaska Native villages. One member noted that it is also important to talk to people and conduct outreach in their own villages, as they may be hesitant to speak at the convention.

Members were frustrated by current State management of the commercial and subsistence salmon fisheries that create conflict between upper and lower river salmon users, while at the same time, the Bering Sea pollock fishery is allowed an unlimited amount of salmon bycatch. Yukon River fishermen and communities have been conserving and sacrificing, but the pollock industry could do much more than they have been. Members were frustrated by the level of Chinook bycatch, the waste it represents, believed that there is a direct correlation between high bycatch years and low returns to the river in subsequent years, and reiterated that the current cap is too high. All testifiers implored the Council to recognize that there is a long cultural, spiritual, and dietary dependence on salmon and the ability to

subsistence harvest salmon. Residents of remote villages do not have access to substitute foods, and they also need salmon to feed their dogs through the winter.

One testifier stated that the advisory status Alaska Natives are afforded in the Federal and State fisheries management processes in Alaska lead to frustrated attempts to getting the real issues on the table; by contrast, participation by tribes in the Pacific Northwest appears result in more meaningful dialogue and positive outcomes. The discussion included mention that there is not a designated tribal seat on the North Pacific Council, as there is on the Pacific Council, and there needs to be more Alaska Native representation on the current Council. In addition, the North Pacific salmon recovery fund sponsors participation by OR and WA tribes in the management process; the new budget, when passed, amends the provisions of this fund such that Alaska tribes will also have access to these monies.

Another member noted that the 10 year average for Chinook bycatch is decreasing, specifically the years since 2007. They support a lower cap on chum (and Chinook, recognizing the Council has already taken action) and want to encourage a meaningful dialogue to debate the issue prior to a decision. The goal is to pass the right to fish for salmon (both subsistence and commercially) to future generations. A meeting was mentioned in April for salmon users to discuss reducing their take on the lower river to allow salmon to get to the spawning grounds. One member questioned whether ANILCA applies to Council decisions.

Summary of statewide teleconference on proposed alternatives to limit non-Chinook (chum) salmon bycatch in the Bering Sea pollock fisheries

North Pacific Fishery Management Council May 4, 2010

Purpose

Both the Rural Community Outreach Committee and the North Pacific Fishery Management Council (Council) recommended conducting a statewide public teleconference prior to the June 2010 Council meeting, thus, this effort was included in the Council's outreach plan on this issue.¹ The primary purpose of the teleconference was an orientation for the public on the alternatives currently proposed to evaluate new management measures to limit non-Chinook (chum) salmon bycatch in the Bering Sea pollock fisheries.² The teleconference was intended to help the public understand the Council process, the basics of the alternatives proposed, and ways to provide formal input to the Council. A secondary purpose was to document public input on the suite of alternatives and general concerns related to the issue, and provide that feedback to the Council in June.

The timing of the teleconference was such that the public would have an opportunity to understand the proposed action and how to provide comment on the issue, prior to the Council finalizing alternatives for analysis in June. The June Council action will provide a starting point from which to base the preliminary analysis, recognizing that the Council can modify the alternatives at Council meetings throughout the analytical process. The preliminary analysis for the proposed action will be developed from June 2010 through January 2011, with the Council's first review scheduled for its February 2011 meeting.

Logistics and participation

The teleconference was publicized in several ways: email notices, postings on the Council website, Federal Register notice, newspaper notices, and direct mailings to stakeholders. The mailing was sent March 31, to notify the public of the teleconference, the current suite of alternatives under consideration, and the analytical and Council schedule for action. The mailing was sent to over 600 individuals and entities, including community governments, regional and village Alaska Native corporations, regional non-profit Alaska Native corporations, tribal entities, Federal Subsistence Regional Advisory Council coordinators, Community Development Quota corporations, ADF&G Regional Coordinators, and other community or Alaska Native entities.

Key contacts in western Alaska were also contacted and asked to host a site at which community residents could participate, and/or publicize the call in their organization's newsletter or email listserve. Newspapers contacted were the Nome Nugget, Bristol Bay Times (Dillingham), Tundra Drums (Bethel), and the Arctic Sounder (Kotzebue).

The teleconference was open to the public, and hosted by the Council and the Alaska Sea Grant Marine Advisory Program. The call was moderated and recorded by EventBuilder.³ A toll-free number was

¹ The Council's outreach plan for the Bering Sea chum salmon bycatch issue is provided here:

http://www.fakr.noaa.gov/npfmc/current_issues/bycatch/ChumOutreach410.pdf

² The Council's alternatives are provided here (last revision in February 2010):

http://www.fakr.noaa.gov/npfmc/current_issues/bycatch/ChumBycatchMotion210.pdf

³ EventBuilder is a provider of online event technology and conferencing services that provides event management, online registration and web and audio conferencing. www.eventbuilder.com.

provided, and an unlimited number of lines could be accommodated. The audio file for the teleconference is available at: <http://www.box.net/shared/j37fjq8i1>.

The call occurred from 9 am – 11 am on May 4. Council analysts, Nicole Kimball and Dr. Diana Stram, provided a 30 minute presentation on the proposed action, community outreach plan, and Council process, with 90 minutes remaining for questions and comments from the public. Callers provided their name and location. The powerpoint presentation was posted on the Council website two weeks prior to the teleconference, and is attached as **Appendix A**.

The call log, which indicates the number of callers, their location, and the amount of time they participated, is provided as **Appendix B**. A total of 73 unique lines called in, which effectively means a minimum of 73 people participated, as there were several sites with more than one person on the line. Note that the call log indicates that 86 lines participated, but several of those were from the same number, resulting in a total number of 73 individual lines (e.g., a person called in for a portion of the call, hung up, then called back in later). Individual phone numbers of participants are not provided in the call log to protect confidentiality. The maximum number of lines participating at any one time was 53. Thirty-one different locations were represented, with 20 of those being small Alaska villages.

Summary of questions and comments

The following provides a brief summary of participants' questions and comments. About 25 questions and/or comments were provided, by 18 participants. For detail and an exact account of both the questions and responses, please refer to the audio file at: <http://www.box.net/shared/j37fjq8i1>.

1. *Edward Mark, Quinhagak. Natural Resource Director, Native Village of Quinhagak.* Rural villages have an unwritten rule about not wasting resources in subsistence hunting and gathering, thus, it is counter-intuitive to set a goal for how much salmon can be wasted in the form of bycatch. Edward questioned whether there were programs implemented to distribute chum salmon bycatch for use by community residents. A follow-up comment focused on Alternative 2; if a hard cap is selected, he supports the lowest cap possible.
2. *Victor Lord, Nenana. Commercial and subsistence salmon fisherman, Tanana River.* Question about where the pollock fishery operates, and how the Council and NMFS know where they operate (i.e., what is the managers' level of confidence in the pollock fishery's areas of operation). Also a question about the timing for public comment on this issue at the June 2010 Council meeting.
3. *Ted Suckling, Nenana. Yukon River Drainage Fisheries Association.* Question about whether there are observers on all pollock vessels, and how much the public and fisheries managers can rely on observers' bycatch estimates.
4. *Tom Okleasik, Kotzebue. Planning Director, Northwest Arctic Borough.* Question about whether the bycatch trend analysis will incorporate the natural population variation in the salmon stocks, and whether it accounts for past commercial fisheries effects (i.e., bycatch in previous years). A second question focused on the results of the finer scale, less aggregated genetic information that may be available in 2011, and whether and how indigenous people will have a role in the research process with NMFS (i.e., sample taking, interpretation of results, etc.).
5. *Don Rivard, Anchorage. Office of Subsistence Management, USFWS.* Question on whether BSAI Amendment 91 (Chinook salmon bycatch action) is on track for possible approval by the Secretary of Commerce this year, with implementation by NMFS in January 2011. Related question as to how Amendment 91 will be addressed or incorporated in the chum salmon bycatch

analysis (i.e., as part of the status quo). A follow-up question on whether the action taken under BSAI Amendment 91 to limit Chinook salmon bycatch is likely to also serve to limit chum bycatch.

6. *Julie Raymond-Yakoubian, Nome. Anthropologist, Kawerak, Inc.* Question regarding what specific steps the Council is taking to engage with NMFS on tribal consultation issues, to make sure that tribal issues are taken into consideration and addressed prior to a Council decision.
7. *Louie Green, Nome. Subsistence and commercial salmon fisherman.* Comment that the Nome subdistrict has given all the Chinook and chum salmon to intercept fisheries that it can handle; the region is losing its salmon culture and salmon cannot afford to be wasted through bycatch. Question about how the recent oil spill in the Gulf of Mexico may affect the Council's approach and decision-making on fisheries management in the Bering Sea.
8. *Morris Nuparuk (sp.?), Elim.* Comment: Since 1964, residents have been documenting how many salmon have passed the salmon counting tower in their area; a reduction in the number of salmon making it to the river has been recognized since the pollock fishery started picking up in the 1980s. In the 1970s, local fishermen could fish at least two 48-hour periods, every week. Currently, fishermen are usually on standby for a salmon opener. Question about whether there is any funding set-aside from the pollock fishery to re-stock rivers and tributaries.
9. *Charlie Fitka, St. Michael. IRA Council, subsistence and commercial salmon fishermen, Yukon River.* Comment that residents have been limited in both subsistence and commercial salmon fisheries in recent years. He was fined in 2009 for subsistence fishing; he did not have a radio and was unaware that ADF&G had reduced the net size limits. Question focused on how are we going to control bycatch of salmon in the Bering Sea when the subsistence way of life is being controlled by ADF&G. Comment continued that there is too much waste and we cannot let this amount of bycatch continue.
10. *Edward Mark, Quinhagak. Natural Resource Director, Native Village of Quinhagak.* Question on whether there is a tagging system in place in the Area M (commercial salmon) fisheries so that we can determine to which rivers (e.g., Yukon or Kuskokwim) chum salmon are migrating. If a tagging system is not in place, can we incorporate such a system in this proposed action.
11. *Lisa Ragone, Juneau. USCG.* Comment regarding the current rolling hot spot closure system (status quo, Alternative 1); it appears that the pollock fishery has a hard time avoiding salmon, even when they are trying to do so. Request to explain the new 'zone' closure system, and the size of the areas proposed for pollock closures, under Alternative 3.
12. *Ted Suckling, Nenana. Yukon River Drainage Fisheries Association.* Comment: Residents in his region (Interior) fish at the headwaters of the Tanana River, and are concerned with getting enough salmon up the river to spawn. They support a management system that would keep bycatch as low as possible. Question on how the Council determined the numbers of salmon that represent the range of hard caps under Alternative 2. What is the basis for those options?
13. *Nancy Swanson, Anchorage. National Park Service.* Comment to encourage staff to include in the analysis how the Federal management system for subsistence would be affected by the alternatives proposed (i.e., do not limit the analysis to how ADF&G management is affected). As the analysis is developed, analysts should consider Title 8 of ANILCA (subsistence priority), both in terms of providing an understanding of Title 8 in the analysis and in developing the alternatives for evaluation.

14. *Louie Green, Nome. Subsistence and commercial salmon fisherman.* Question regarding whether there have been any new genetic subsamples of Chinook and chum salmon taken in the Nome subdistrict. If not, why haven't they been requested.
15. *Tim Smith, Nome. Nome Fishermen's Association.* Question about whether it is reasonable to attempt to manage chum salmon bycatch without considering commercial salmon fisheries in Area M, especially in light of providing an ecosystem approach to fisheries management. Discussions on the approach at the February 2010 Council meeting were concerning; if Area M is a substantial mortality factor, it need to be incorporated into overall management system for chum salmon. Follow-up question related to the Community Development Quota (CDQ) Program. The Norton Sound Economic Development Corporation (NSEDC), representing Bering Straits communities, did not communicate the position they were going to recommend to the Council on Chinook salmon bycatch to the public in advance. Question on whether the CDQ groups have any obligation to communicate with their constituents on chum salmon bycatch.
16. *John Chase, Kotzebue. Northwest Arctic Borough.* Comment that he hopes that the Council can put significant weight on the comments provided by subsistence users of salmon throughout this process.
17. *Muriel Morse, Anchorage (originally from Koyuk). Alaska Marine Conservation Council.* Comment that it is necessary to recognize that Yupik is the primary language for many affected stakeholders in rural Alaska. In the future, the Council should consider providing translation services during teleconferences, outreach meetings, and Council meetings, in order to increase understanding and participation.
18. *Jetta Minerva, Galena. Subsistence specialist, Koyukuk and Nowitna National Wildlife Refuge.* Comment on the treaty between the U.S. and Canada, which requires that the U.S. provide 45,000 Chinook salmon. The Council needs to take into consideration salmon treaty obligations, and also recognize that in the past year it took a significant effort by Yukon fishery managers and sacrifices by subsistence users to meet the treaty obligation.
19. *Victor Lord, Nenana. Commercial and subsistence salmon fisherman, Tanana River.* Question about the timing of the A and B seasons for the Bering Sea pollock fishery and its relationship to Chinook and chum salmon bycatch. Question as to whether fisheries managers put more emphasis on the B season, in terms of chum salmon bycatch.
20. *Sam ??, Quinhagak.* Comment: The CDQ group in the Quinhagak region (Coastal Village Region Fund) helps local villages with their commercial fisheries management. Question about whether the pollock fishery can be mandated to provide funds for genetic research and management (funding provided directly to the State of Alaska), and specific fisheries projects in western Alaska. Question as to whether there is a way to use funds generated from violations in the pollock fishery to assist and be allocated to specific fisheries projects in western Alaska.
21. *Louie Green, Nome. Subsistence and commercial salmon fisherman.* Comment that the CDQ groups have funds for restoration and rehabilitation of fisheries. Question about the basis for the initial allocations to the CDQ groups; one of the criteria being the population of the communities represented by each group. Question about whether that basis constitutes a legal obligation to the CDQ group's constituency to communicate their positions on issues and state how they are going to use the public resource. Concern about the CDQ community liaisons and Board of Directors being the conduit for the public to receive information on the CDQ group.

22. *Paul Beans, Mountain Village.* Comment that there have been significant reductions on the Yukon River and throughout rivers in western Alaska for both the commercial and subsistence salmon fisheries in recent years, specifically 2008 and 2009. Management measures include shorter seasons, gear restrictions, and overall closures. Question concerning whether the Council has considered taking action to shorten the seasons for the Bering Sea pollock fishery (e.g., cut both A and B seasons in half, in order to share the conservation burden).
23. *Phillip ??, Minto.* Question about why Chinook and chum bycatch in the pollock fishery were so low in 2008. Interest in replicating the management and industry actions taken in 2008 to avoid salmon bycatch; fold those types of actions into the current suite of chum salmon alternatives.
24. *Jetta Minerva, Galena. Subsistence specialist, Koyukuk and Nowitna National Wildlife Refuge.* Question on the survival rate of Chinook and chum salmon caught as bycatch in the Bering Sea pollock fishery.
25. *Ted Suckling, Nenana. Yukon River Drainage Fisheries Association.* Question and concern about why the Bering Sea pollock fishery takes precedence over the subsistence salmon fishery, as subsistence is a way of life.



Who are we?

The North Pacific Fishery Management Council (Council) and National Marine Fisheries Service (NMFS):

- Together manage U.S. Federal fisheries off Alaska (3-200 miles)
- Management is coordinated (and in some cases jointly managed) with the State of Alaska
- Council makes recommendations to NMFS
- NMFS approves, implements, and enforces them

Who is on the Council?

15 total members

- 11 voting
- 4 designated seats (heads of: NMFS, ADF&G, Washington & Oregon Depts of Fish and Wildlife)
- 7 appointed seats (5 Alaska & 2 Washington)
- 4 non-voting
- USCG, Pacific States, Dept of State, US Fish & Wildlife

Council meetings

- 5 meetings per year
- 3 in Anchorage, 1 in AK fishing community, 1 in Seattle or Portland
- Each meeting is ~8 days
- All meetings open to the public
- Many opportunities for public comment, including written and oral testimony on each agenda item
- Audio link available to listen to Council meetings remotely (real-time)

Magnuson Stevens Act

- Council management of fisheries is governed by the Magnuson-Stevens Act (Federal law)
- Council primarily manages groundfish (Pacific cod, pollock, flatfish, sablefish, rockfish, etc); shellfish; halibut allocations
- Management areas: Bering Sea, Aleutian Islands, and Gulf of Alaska
- Includes management of bycatch in these fisheries

Magnuson Stevens Act

10 National Standards – Council and NMFS must consider several factors, including:

- Minimizing bycatch to extent practicable (e.g., salmon bycatch),
- Preventing overfishing while achieving, on a continuing basis, the optimum yield from each fishery (e.g., the Bering Sea pollock fishery),
- Providing for the sustained participation and minimize adverse impacts on fishing communities.

Council Decision Process

- Proposal presented to Council from public, stakeholder group, or Council
- If desired, Council initiates analysis of alternatives and options
- Council receives input on draft analyses and issues from its Scientific and Statistical Committee, Advisory Panel, various issue-specific committees, and the public at each meeting

Council Decision Process (cont.)

Analysis proceeds through:

- Initial review draft
 - further refine alternatives if necessary
- Public review draft
 - final council decision (selection of preferred alternative)
- Final Council decision is then submitted to the Secretary of Commerce

NMFS rulemaking process

- NMFS publishes a proposed rule to implement the regulations (**status of Chinook bycatch measures under Am. 91**)
- Comments received on PR
- Secretary can approve, disapprove, or partially approve the Council's decision
- If approved by Secretary, NMFS publishes final rule (responds to comments from PR)
- Final rule establishes effective date

Opportunities for public comment

- During each Council meeting
 - Science and Statistical Committee
 - Advisory Panel
 - Council
- Council committees (e.g., Salmon Bycatch Workgroup)
- During rulemaking
 - Comment solicited on analysis and rule

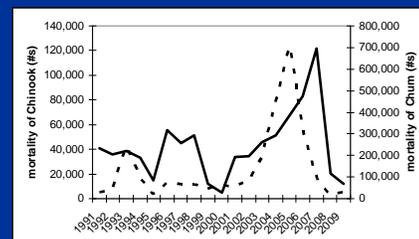
Salmon bycatch in the Bering Sea pollock fisheries

- Bering Sea pollock fishery catches salmon as bycatch (primarily Chinook and chum)
- Bycatch, by law, is counted but cannot be retained or sold
 - Some salmon is donated to food banks



Salmon bycatch trends

- 4 sectors in pollock fishery: offshore catcher processors, inshore catcher vessels, motherships, CDQ
- Differential bycatch by sector
(Chinook is solid line; chum is dotted line in graph below)



Council action

- The Council has been managing salmon bycatch using time-area closures since the mid-1990s
- Fixed time-area closures are not responsive to changing conditions
- Since 2005, Council has been evaluating different management measures
- The Council is addressing Chinook and non-Chinook (chum) salmon bycatch in separate actions

Status of Chinook bycatch action (BSAI Am. 91)

- Council recommended hard cap
- Proposed rule was published March 23, 2010
<http://www.fakr.noaa.gov/prules/75fr14016.pdf>
- Comments on FMP language were due April 19; comments on proposed rule due to NMFS by **May 7**
- Expected implementation by January 2011

Council proposed action on non-Chinook (chum) bycatch

- Status quo: time/area closures that the pollock fleet is exempt from because they voluntarily participate in a rolling hotspot closure system
- Alternative management measures considered:
 - Revised time/area closure system
 - Hard caps

Alternatives posted at:
www.fakr.noaa.gov/nplmc/current_issues/bycatch/ChumBycatchMotion210.pdf

Current chum alternatives: Alternative 1

- Alternative 1 (Status quo): voluntary rolling hotspot closure system
- Provides exemption from current salmon savings area since 2006
 - System of short-term (3 to 7 day) moving, discrete area closures based on real-time high bycatch areas
 - Closures apply to 10 pollock sectors or cooperatives with the highest bycatch

Current chum alternatives: Alternative 2

- Alternative 2: Hard caps ranging from 50,000-353,000 non-Chinook salmon
- Range initially based on historical bycatch trends 1997-2009; rounded and lowered by Council in December 2009
 - Divided by sector similar to Chinook
 - No incentive program included at present

Current chum alternatives: Alternative 3

- Alternative 3: Triggered time/area closures
- Staff developing proposed discrete closure system based on recent bycatch patterns
 - Zonal approach being considered:
 - 3 zones in EBS which when triggered would enact discrete closure system
 - Areas, zones and appropriate trigger thresholds being revised for Council consideration in June

Schedule for Council action on chum (short-term)

- Action in June 2010: Review/revise alternatives and initiate analysis
- Information to be provided to Council in June:
 - Cap calculations based on Council motion (sector allocation changes)
 - Proposed area closures and zonal trigger approach
 - Review results of statewide teleconference on alternatives (May 4)
 - Update on genetics, both Chinook and chum

Current genetic breakouts: chum

- Analysis will consider observed bycatch stock composition using genetic samples from 2005 – 2009
- Stock composition currently available by aggregate groupings only (micro-satellite baseline):
 - Japan/Korea/China/southern Russia
 - Russia
 - Upper/Middle Yukon River
 - Coastal western Alaska/lower Yukon River
 - Alaska Peninsula
 - Southeast AK/PWS/northern British Columbia
 - Skeena River
 - British Columbia/Washington
- Future stock composition may be reported on finer scale, capability no sooner than 2011 (two marker systems: SNPs + micro-satellite)

Schedule for Council action on chum (long-term)

- June 2010: Development of preliminary analysis starts
- Dec 2010: Presentation to Yukon River Panel
- February 2011: Council review of preliminary analysis
- Feb/March 2011: Regional outreach meetings in western AK
- June 2011 (Nome): Council review of initial review analysis (select prelim preferred alt)
- Late 2011: Tentative Council final action

Rural community outreach: chum salmon bycatch

Council's Rural Community Outreach Committee has helped develop a chum salmon bycatch outreach plan, similar to Chinook plan, with improvements

- Outreach plan includes:
 - Statewide mailings (throughout process)
 - Statewide teleconference: May 4
 - 9 regional meetings targeted in western AK (2010/early 2011): Association of Village Council Presidents, 5 Subsistence RACs, Yukon River Drainage Fisheries Assn, Tanana Chiefs Conference, Kawerak, plus Yukon River Panel
 - Documentation of outreach results; report to Council early in process

Rural community outreach: chum salmon bycatch

- 9 regional meetings possible in western AK (primarily Feb/March 2011):
- 2 Council members and Council analysts
 - Working with regional organizations to be on agenda of their meetings
 - Timing of regional meetings is prior to Council's selection of preliminary preferred alternative (June 2011, Nome)
 - Timing of regional meetings will allow input to be considered and incorporated into analysis

How to provide public input to the Council

- **Write a letter to the Council.** Send letters by mail or fax to:
North Pacific Fishery Management Council
605 W 4th Ave Suite 306
Anchorage, AK 99501
Fax: (907) 271-2817; Phone: (907) 271-2809
- **Testify at a Council meeting** when the Council will discuss a particular action. Each agenda is posted on the Council website the month before the Council meeting. You may send a letter by mail or fax to the Council to the address above. If sent at least a week prior to the meeting, your letter will be in the Council notebooks.
- **Check the Council website below, or contact us to find out about upcoming agenda items.**
Council website: <http://www.alaskafisheries.noaa.gov/npfmc>

Appendix B: Audio call log for May 4 teleconference

<i>Location</i>	<i>Start Time (PST)</i>	<i>End Time (PST)</i>	<i>Duration</i>
Anchorage, AK	5/4/2010 9:59	5/4/2010 10:04	5
Anchorage, AK	5/4/2010 11:04	5/4/2010 11:18	14
Anchorage, AK	5/4/2010 11:19	5/4/2010 11:42	23
Anchorage, AK	5/4/2010 9:55	5/4/2010 11:53	118
Anchorage, AK	5/4/2010 9:59	5/4/2010 11:53	114
Anchorage, AK	5/4/2010 10:05	5/4/2010 11:53	108
Anchorage, AK	5/4/2010 10:00	5/4/2010 11:53	113
Anchorage, AK	5/4/2010 9:43	5/4/2010 11:53	130
Anchorage, AK	5/4/2010 9:59	5/4/2010 11:53	114
Anchorage, AK	5/4/2010 11:42	5/4/2010 11:53	11
Anchorage, AK	5/4/2010 10:02	5/4/2010 11:53	111
Anchorage, AK	5/4/2010 9:59	5/4/2010 11:53	114
Anchorage, AK	5/4/2010 9:59	5/4/2010 11:53	114
Anchorage, AK	5/4/2010 10:12	5/4/2010 11:53	101
Bethel, AK	5/4/2010 10:08	5/4/2010 10:12	4
Bethel, AK	5/4/2010 10:07	5/4/2010 10:23	16
Boston, MA	5/4/2010 10:02	5/4/2010 11:34	92
Chevak, AK	5/4/2010 10:05	5/4/2010 11:53	108
Eagle River, AK	5/4/2010 10:00	5/4/2010 10:38	38
Elim, AK	5/4/2010 10:09	5/4/2010 10:22	13
Elim, AK	5/4/2010 10:24	5/4/2010 10:30	6
Elim, AK	5/4/2010 10:39	5/4/2010 11:09	30
Elim, AK	5/4/2010 11:15	5/4/2010 11:31	16
Elim, AK	5/4/2010 11:06	5/4/2010 11:53	47
Fairbanks, AK	5/4/2010 10:02	5/4/2010 10:43	41
Fairbanks, AK	5/4/2010 10:46	5/4/2010 10:49	3
Fairbanks, AK	5/4/2010 10:14	5/4/2010 11:35	81
Fairbanks, AK	5/4/2010 10:00	5/4/2010 11:36	96
Fairbanks, AK	5/4/2010 10:04	5/4/2010 11:53	109
Fairbanks, AK	5/4/2010 9:59	5/4/2010 11:53	114
Fairbanks, AK	5/4/2010 10:07	5/4/2010 11:53	106
Fort Yukon, AK	5/4/2010 10:03	5/4/2010 10:39	36
Galena, AK	5/4/2010 9:57	5/4/2010 10:02	5
Galena, AK	5/4/2010 10:02	5/4/2010 11:53	111
Gambell, AK	5/4/2010 10:06	5/4/2010 10:17	11
Homer, AK	5/4/2010 9:59	5/4/2010 11:53	114
Juneau, AK	5/4/2010 10:02	5/4/2010 11:12	70
Juneau, AK	5/4/2010 10:00	5/4/2010 11:53	113
Juneau, AK	5/4/2010 9:51	5/4/2010 11:53	122
Juneau, AK	5/4/2010 10:31	5/4/2010 11:53	82
Juneau, AK	5/4/2010 9:59	5/4/2010 11:53	114
Juneau, AK	5/4/2010 10:00	5/4/2010 11:53	113
Kodiak, AK	5/4/2010 9:55	5/4/2010 10:18	23
Kodiak, AK	5/4/2010 10:17	5/4/2010 11:08	51
Kodiak, AK	5/4/2010 10:01	5/4/2010 11:51	110
Kodiak, AK	5/4/2010 10:04	5/4/2010 11:53	109
Kotzebue, AK	5/4/2010 10:29	5/4/2010 11:53	84
Kotzebue, AK	5/4/2010 9:59	5/4/2010 11:53	114
Kwethluk, AK	5/4/2010 11:35	5/4/2010 11:46	11
Kwigillingok, AK	5/4/2010 10:02	5/4/2010 10:57	55
Kwigillingok, AK	5/4/2010 11:26	5/4/2010 11:53	27
Lewisville, TX	5/4/2010 9:52	5/4/2010 10:07	15
Minto, AK	5/4/2010 10:23	5/4/2010 11:53	90
Mountain Village, AK	5/4/2010 10:50	5/4/2010 11:39	49
Mountain Village, AK	5/4/2010 11:40	5/4/2010 11:53	13
Nenana, AK	5/4/2010 10:01	5/4/2010 11:53	112
Nome, AK	5/4/2010 10:00	5/4/2010 10:03	3
Nome, AK	5/4/2010 10:46	5/4/2010 10:47	1
Nome, AK	5/4/2010 10:03	5/4/2010 11:22	79
Nome, AK	5/4/2010 9:57	5/4/2010 11:53	116

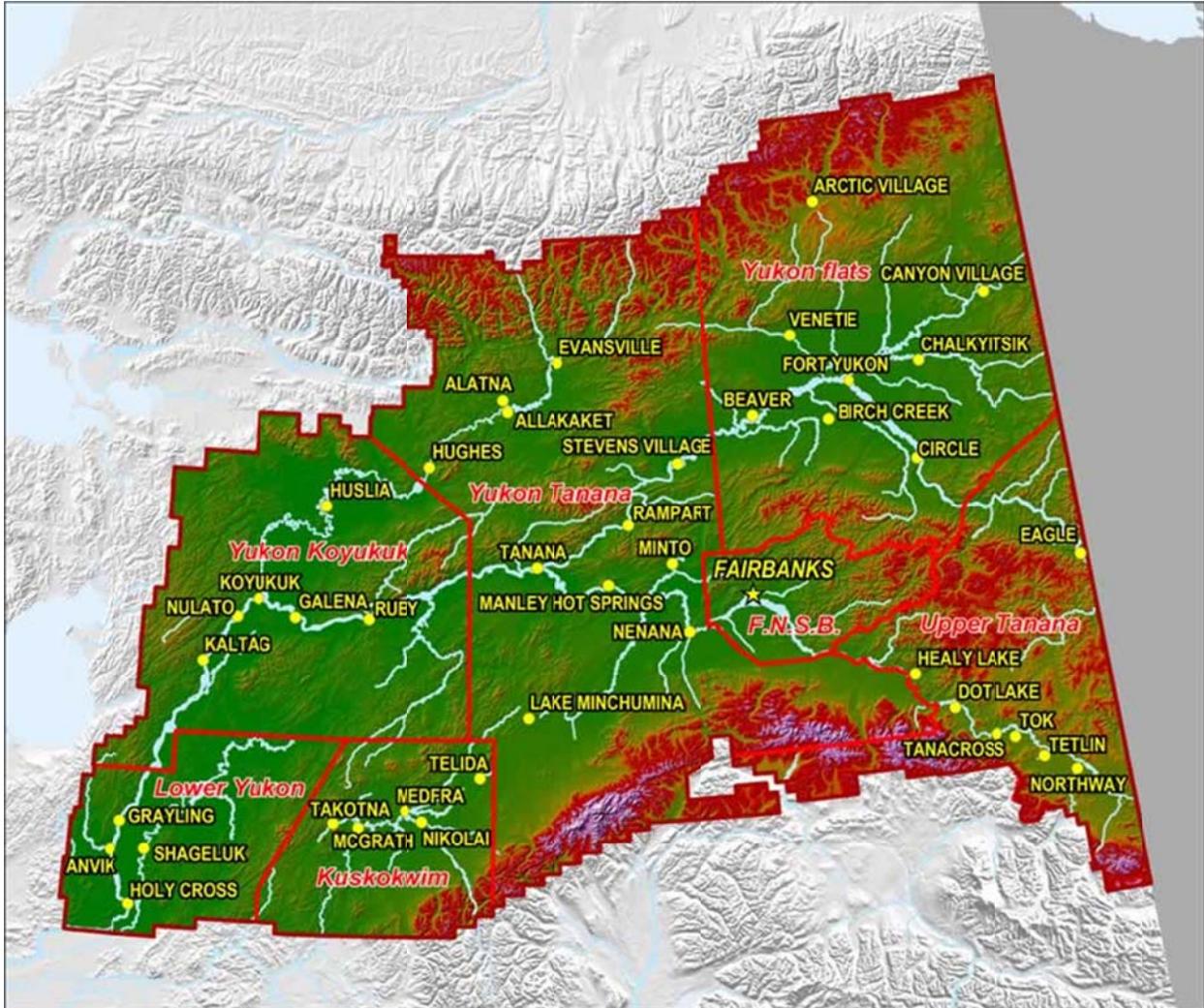
Appendix B: Audio call log for May 4 teleconference

Nome, AK	5/4/2010 11:25	5/4/2010 11:53	28
Nome, AK	5/4/2010 10:48	5/4/2010 11:53	65
Nome, AK	5/4/2010 10:05	5/4/2010 11:53	108
Nunam Iqua, AK	5/4/2010 9:59	5/4/2010 10:02	3
Nunam Iqua, AK	5/4/2010 10:03	5/4/2010 10:28	25
Nunapitchuk, AK	5/4/2010 10:12	5/4/2010 11:53	101
Quinhagak, AK	5/4/2010 9:58	5/4/2010 11:53	115
Quinhagak, AK	5/4/2010 11:30	5/4/2010 11:53	23
Savoonga, AK	5/4/2010 9:58	5/4/2010 11:53	115
Scammon Bay, AK	5/4/2010 10:23	5/4/2010 10:55	32
Scammon Bay, AK	5/4/2010 10:07	5/4/2010 11:53	106
Scammon Bay, AK	5/4/2010 10:56	5/4/2010 11:53	57
Seattle, WA	5/4/2010 8:58	5/4/2010 9:00	2
Seattle, WA	5/4/2010 9:01	5/4/2010 9:03	2
Seattle, WA	5/4/2010 10:00	5/4/2010 10:58	58
Seattle, WA	5/4/2010 10:55	5/4/2010 11:51	56
Seattle, WA	5/4/2010 10:03	5/4/2010 11:53	110
Seattle, WA	5/4/2010 10:03	5/4/2010 11:53	110
Seattle, WA	5/4/2010 10:08	5/4/2010 11:53	105
Shageluk, AK	5/4/2010 10:54	5/4/2010 11:43	49
St. Michael, AK	5/4/2010 10:08	5/4/2010 11:53	105
Toksook Bay, AK	5/4/2010 9:57	5/4/2010 10:32	35
Vancouver, WA (Event Manager)	5/4/2010 9:34	5/4/2010 11:53	139
Washington, DC	5/4/2010 11:04	5/4/2010 11:53	49
		Total Duration	5663
*PST = Pacific standard time.			
Source: EventBuilder, May 5, 2010.			

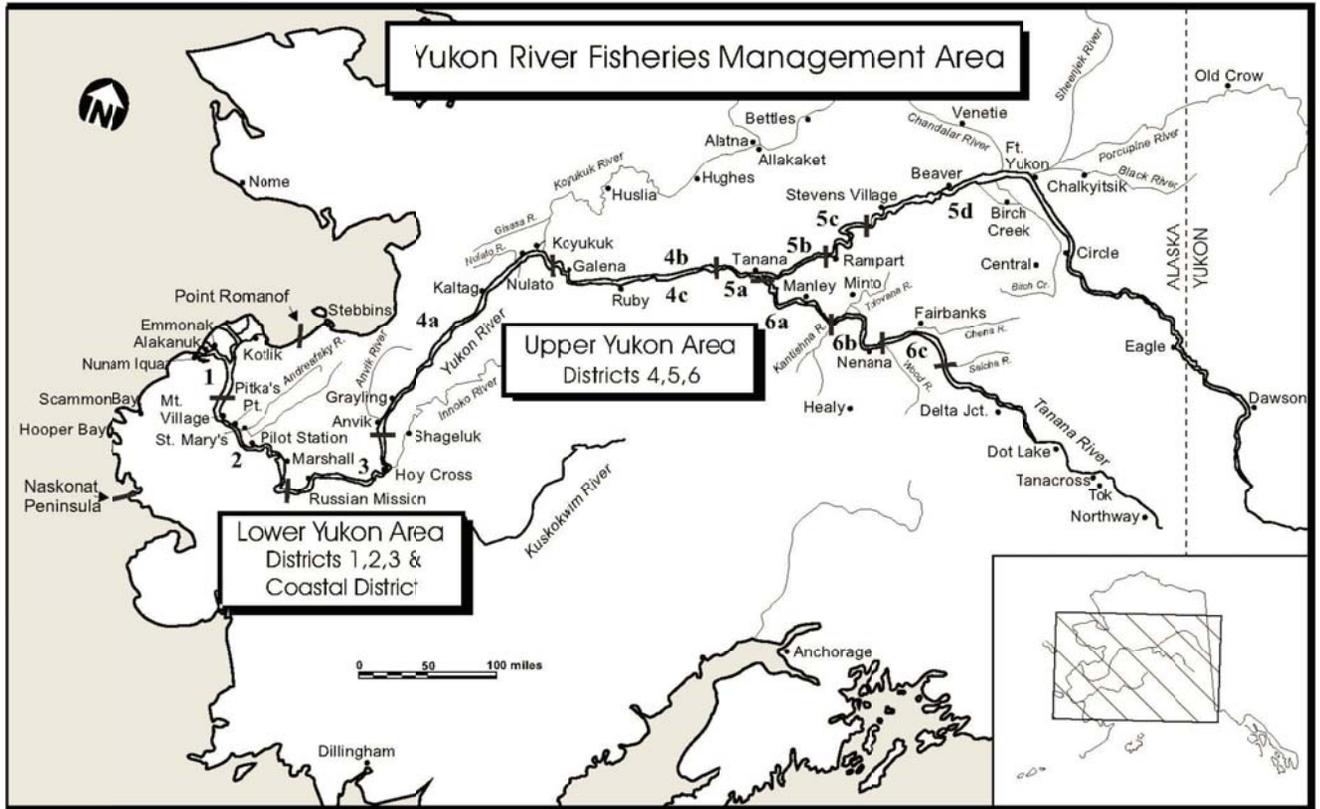
Appendix 2 to Outreach Report

Maps of villages represented by the entities holding regional meetings at which outreach was scheduled

Tanana Chiefs Conference (42 tribes)

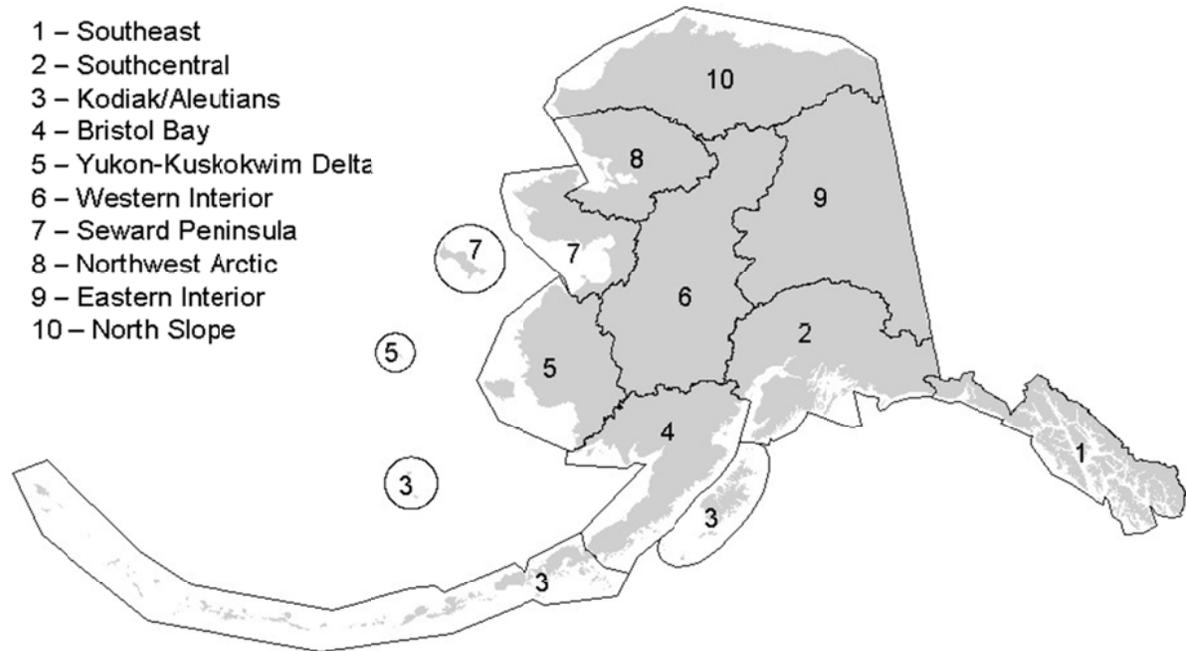


Yukon River Drainage Fisheries Association



Federal Subsistence Regional Advisory Council meetings attended in February/March 2011: Eastern Interior, Western Interior, Yukon-Kuskokwim Delta, and Bristol Bay. (There was a schedule conflict with the Seward Peninsula RAC meeting.)

Regional Advisory Council Areas



Kawerak, Inc. (20 villages)



Image (c)2006 TerraMetrics & (c)2005 Google

Appendix 3 to the Outreach Report: Resolutions or motions resulting from regional meetings related to the Council's chum salmon bycatch proposed action

Seward Peninsula Subsistence Regional Advisory Council

Eastern Interior Subsistence Regional Advisory Council

Yukon-Kuskokwim Delta Subsistence Region Advisory Council

Yukon River Drainage Fisheries Association

Western Interior Subsistence Regional Advisory Council

Bristol Bay Subsistence Regional Advisory Council

Seward Peninsula Subsistence Advisory Council Recommendation to the Federal Subsistence Board for Limiting Chum Salmon Bycatch in the Bering Sea and Aleutian Islands Pollock Fisheries

The Seward Peninsula Subsistence Advisory Council requests a recommendation from the Federal Subsistence Board to the North Pacific Fisheries Management Council asking the NPFMC to establish a limit of 30,000 chum salmon taken as bycatch in the Bering Sea and Aleutian Islands pollock fisheries.

Background:

Western Alaska salmon dependent communities have experienced severe restrictions on chum salmon harvesting opportunity. It is known that a significant number of chum salmon bound for Western Alaska streams are taken as bycatch in the Bering Sea and Aleutian Islands pollock fisheries.

The chum salmon taken as bycatch are from mixed stocks and there is no methodology available for identifying with sufficient accuracy where the fish taken as bycatch would have gone to spawn if they had not been caught.

Chum salmon returns to some Western Alaska streams have been reduced to a few hundred fish.

Problem statement:

The high numbers of chum salmon taken as bycatch represent an unacceptable threat to the health and survival of Western Alaska stocks by reducing the numbers returning below the number needed for escapement.

The harvest of chum salmon as bycatch in the pollock fisheries has imposed an unacceptable burden on Western Alaska salmon dependent communities by reducing the numbers available for harvesting.

Solution:

Establish a limit of 30,000 chum salmon taken as bycatch in the Bering Sea and Aleutian Islands pollock fisheries.

Justification:

A bycatch limit of 30,000 chum salmon establishes a reasonable balance between the economic interests of the pollock trawl industry and the needs of subsistence users for chum salmon.

Adopted at the February 15-16, 2011 meeting of the Seward Peninsula Advisory Council.

Resolution Regarding Chum Bycatch in the Bering Sea Pollock Fishery

Whereas, chum salmon are a vital subsistence fishery resource for subsistence users in the Eastern Interior Regional Advisory Committee region and are also essential for the small scale commercial fisheries that provide income necessary to participate in subsistence hunting, fishing and gathering, and in many years there are not enough chum to provide for subsistence and commercial uses for users throughout the Yukon drainage; and

Whereas, chum salmon are caught as bycatch in the Bering Sea pollock fishery—in 2005 over 700,000 chum were taken as bycatch—and many of these salmon are discarded overboard since it is illegal for the trawl fishery to sell the bycatch and the quality of the bycatch is often not sufficient to deliver to food banks; and

Whereas, although the bycatch has fallen over the last few years, there is little in regulation to prevent extremely high bycatch to re-occur, and the North Pacific Fishery Management Council (NPFMC) is in the process of developing regulations intended to “minimize salmon bycatch, to the extent practicable, while attempting to allow full harvest of the pollock total allowable catch”; and

Whereas, the last time the NPFMC balanced these contradictory goals was in relation to the bycatch of Chinook salmon in the Bering Sea pollock fishery, and the outcome was extremely disappointing to subsistence users in the Yukon region in that it continued to allow as many as 60,000 Chinook salmon to be caught annually as bycatch despite drastic subsistence and commercial fishery restriction on the Yukon River and failure to meet Chinook escapement and treaty obligations; and

Whereas, during the NPFMC Chinook salmon bycatch regulatory process the Federal Subsistence Board (FSB) and the USF&WS recommended and strongly advocated for a bycatch level that was far below that adopted by the Council because of the FSB’s obligation to ensure healthy salmon populations, subsistence opportunity and a priority for subsistence uses; and

Whereas, the NPFMC is meeting in Nome in June of 2011 and will adopt a preliminary preferred alternative for the regulation of chum bycatch at that time.

Now Therefore Be It Resolved that the Eastern Interior Federal Subsistence Regional Advisory Council recommends that the FSB work with affected regional advisory councils, tribes and communities to develop a position from among the alternatives before the NPFMC to regulate chum bycatch. The FSB position should seek to minimize chum bycatch to the greatest extent practicable and thereby ensure healthy fish populations and subsistence and small scale commercial fisheries. The FSB should officially convey this position to the NPFMC before or during the NPFMC meeting in June of 2011.

Dated this third day of March, 2011 at Fairbanks, Alaska.



Chair, Eastern Interior Federal Subsistence Regional Advisory Council

Resolution of the Yukon Kuskokwim Delta Subsistence Regional Advisory Council Regarding Chum Bycatch in the Bering Sea Pollock Fishery

Whereas, chum salmon are a vital subsistence fishery resource for subsistence users in the Yukon Kuskokwim Delta Subsistence Regional Advisory Council region and are also essential for the small scale commercial fisheries that provide income necessary to participate in subsistence hunting, fishing and gathering, and in many years there are not enough chum to provide for subsistence and commercial uses in the Yukon-Kuskokwim Delta and for users throughout the Yukon drainage; and

Whereas, chum salmon are caught as bycatch in the Bering Sea pollock fishery – in 2005 over 700,000 chum were taken as bycatch - and many of these salmon are discarded overboard since it is illegal for the trawl fishery to sell the bycatch and the quality of the bycatch is often not sufficient to deliver to food banks; and

Whereas, although the bycatch has fallen over the last few years, there is little in regulation to prevent extremely high bycatch to re-occur, and the North Pacific Fisheries Management Council (NPFMC) is in the process of developing regulations intended to “minimize salmon bycatch, to the extent practicable, while attempting to allow full harvest of the pollock total allowable catch”; and

Whereas, the last time the NPFMC balanced these contradictory goals was in relation to the bycatch of Chinook salmon in the Bering Sea pollock fishery, and the outcome was extremely disappointing to subsistence users in the Yukon-Kuskokwim Delta in that it continued to allow as many as 60,000 Chinook salmon to be caught annually as bycatch despite drastic subsistence and commercial fishery restriction on the Yukon River and failure to meet Chinook escapement and treaty obligations; and

Whereas, during the NPFMC Chinook salmon bycatch regulatory process the Federal Subsistence Board and the U.S. Fish and Wildlife Service recommended and strongly advocated for a bycatch level that was far below that adopted by the Council because of the Federal Subsistence Board’s obligation to ensure healthy salmon populations, subsistence opportunity and a priority for subsistence uses; and

Whereas, the NPFMC is meeting in Nome in June of 2011 and will adopt a preliminary preferred alternative for the regulation of chum bycatch at that time.

Now Therefore Be It Resolved that the Yukon Kuskokwim Delta Subsistence Regional Advisory Council recommends that the Federal Subsistence Board work with affected regional advisory councils, tribes and communities to develop a position from among the alternatives before the NPFMC meet to regulate chum bycatch. The Federal Subsistence Board position should seek to minimize chum bycatch to the greatest extent practicable and thereby ensure healthy fish populations and subsistence and small scale commercial fisheries. The Federal Subsistence Board should officially convey this position to the NPFMC before or during the NPFMC meeting in June of 2011.

Dated this 24th day of February, 2011 at Mountain Village, Alaska.

Lester Wilde, Chair of the Yukon Kuskokwim Delta Regional Advisory Council



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

725 Christensen Drive, Suite 3-B, Anchorage, Alaska 99501
Tel: 907-272-3141 Fax: 907-272-3142

**Resolution: 2011-02
Salmon Bycatch**

WHEREAS the Yukon River Drainage Fisheries Association (YRDFA) works on behalf of subsistence and commercial fishing families within the Alaskan and Canadian Yukon River drainage who depend on wild salmon for subsistence and commercial fisheries; and

WHEREAS chum salmon provide an essential source of food, income and culture for the people of the Yukon River; and

WHEREAS subsistence harvests of fall chum salmon have been restricted in recent years, and no directed commercial harvests of fall chum salmon have taken place on the Yukon River; and

WHEREAS the Bering Sea pollock fishery catches these same salmon as bycatch; catching over 700,000 chum salmon in 2005; and

WHEREAS according to the best available scientific information a portion of the chum salmon taken as bycatch are of Western Alaska origin, including the Yukon River; and

WHEREAS extremely high bycatch numbers have been reached under the current management measures and it is therefore prudent to adopt new management measures;

THEREFORE BE IT RESOLVED that YRDFA requests that the North Pacific Fishery Management Council adopt management measures which will adequately protect Yukon River chum salmon runs at a biologically acceptable level.

COPIES of this resolution will be sent to the North Pacific Fishery Management Council, National Marine Fisheries Service, Alaska Department of Fish and Game Commissioner, Yukon River Panel, U.S. Fish and Wildlife Service, U.S. Department of State, Bering Sea Fishermen's Association, Association of Village Council Presidents, Tanana Chiefs Conference and other Western Alaska salmon groups.

APPROVED unanimously this 16th day of February 2011 by the Board members and delegates of YRDFA assembled at their Twenty-first Annual Meeting held in Mountain Village, Alaska.

Attest: Richard Burnham
Richard Burnham, YRDFA Co-Chair

William A. Astrom
William Astrom, YRDFA Co-Chair

Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

Tim Towarak, Chair
Federal Subsistence Board
c/o U.S. & FWS, Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503

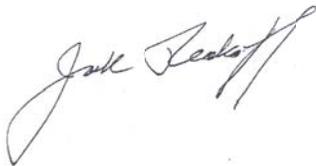
Dear Mr. Towarak:

The Western Interior Alaska Subsistence Regional Advisory Council met on March 1-2, 2011 in Galena, Alaska. The Council addressed various subsistence related management issues; among them is the by-catch issue for chum and Chinook salmon in the Bering Sea.

The Council endorsed the enclosed resolution calling for cooperative efforts to develop positions among alternatives presented by the NPFMC to regulate by-catch in the Bering Sea, Resolution 11-01. The Council asks the Board establish a position to minimize by-catch to the greatest extent to ensure healthy fish populations. The Council should officially convey this position before the NPFMC meets in June 2011.

Thank you for the opportunity for this Council to assist the Federal Subsistence Program to meet its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. We look forward to continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about this resolution, please contact me via Donald Mike, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or (907) 786-3629.

Sincerely,



Jack Reakoff, Chair

cc: Tim Towarak, Chair, Federal Subsistence Board
Peter J. Probasco, Assistant Regional Director, OSM
Western Interior Subsistence RAC members

Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

Resolution 11-01 Regarding Chum Bycatch in the Bering Sea Pollock Fishery

Whereas, chum salmon are a vital subsistence fishery resource for subsistence users in the Western Interior Regional Advisory Committee region and are also essential for the small scale commercial fisheries that provide income necessary to participate in subsistence hunting, fishing and gathering, and in many years there are not enough chum to provide for subsistence and commercial uses for users throughout the Yukon drainage; and

Whereas, chum salmon are caught as bycatch in the Bering Sea pollock fishery—in 2007 over 700,000 chum were taken as bycatch—and many of these salmon are discarded overboard since it is illegal for the trawl fishery to sell the bycatch and the quality of the bycatch is often not sufficient to deliver to food banks; and

Whereas, although the bycatch has fallen over the last few years, there is little in regulation to prevent extremely high bycatch to re-occur, and the North Pacific Fishery Management Council (NPFMC) is in the process of developing regulations intended to “minimize salmon bycatch, to the extent practicable, while attempting to allow full harvest of the pollock total allowable catch”; and

Whereas, the last time the NPFMC balanced these contradictory goals was in relation to the bycatch of Chinook salmon in the Bering Seas Pollock fishery, and the outcome was extremely disappointing to subsistence users in the Yukon region in that it continued to allow as many as 60,000 Chinook salmon to be caught annually as bycatch despite drastic subsistence and commercial fishery restriction on the Yukon River and failure to meet Chinook escapement and treaty obligations; and

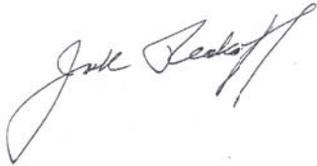
Whereas, during the NPFMC Chinook salmon bycatch regulatory process the Federal Subsistence Board (FSB) and the USF&WS recommended and strongly advocated for a bycatch level that was far below that adopted by the Council because of the FSB’s obligation to ensure healthy salmon populations, subsistence opportunity and a priority for subsistence uses; and

Whereas, the NPFMC is meeting in Nome in June of 2011 and will adopt a preliminary preferred alternative for the regulation of chum bycatch at that time.

Now Therefore Be It Resolved that the Western Interior Federal Subsistence Regional Advisory Council recommends that the FSB work with affected regional advisory councils, tribes and communities to develop a position from among the alternatives before the NPFMC to regulate chum bycatch. The FSB position should seek to minimize chum bycatch to the greatest extent practicable and thereby ensure healthy fish populations and subsistence and small scale

commercial fisheries. The FSB should officially convey this position to the NPFMC before or during the NPFMC meeting in June of 2011.

Dated this 2 day of March, 2011 at Galena, Alaska

A handwritten signature in black ink, appearing to read "Jack Sealoff". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Chairman, Western Interior Federal Subsistence Regional Advisory Council

Bristol Bay Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

Tim Towarak, Chair
Federal Subsistence Board
c/o U.S. & FWS, Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503

Dear Mr. Towarak:

The Bristol Bay Alaska Subsistence Regional Advisory Council met on March 9-10, 2011 in Naknek, Alaska. The Council addressed various subsistence related management issues; among them is the by-catch issue for chum and Chinook salmon in the Bering Sea.

The Council endorsed the enclosed resolution calling for cooperative efforts to develop positions among alternatives presented by the NPFMC to regulate by-catch in the Bering Sea, Resolution 11-01. The Council asks the Board establish a position to minimize by-catch to the greatest extent to ensure healthy fish populations. The Council should officially convey this position before the NPFMC meets in June 2011.

Thank you for the opportunity for this Council to assist the Federal Subsistence Program to meet its charge of protecting subsistence resources and uses of these resources on Federal public lands and waters. We look forward to continuing discussions about the issues and concerns of subsistence users of the Bristol Bay Region. If you have questions about this resolution, please contact me via Donald Mike, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or (907) 786-3629.

Sincerely,

Molly Chythlook, Chair

cc: Federal Subsistence Board
Peter J. Probasco, Assistant Regional Director, OSM
Bristol Bay Subsistence RAC members

**Resolution 11-01 of the Bristol Bay Regional Advisory Council
Regarding Chum Bycatch in the Bering Sea Pollock Fishery**

Whereas, chum salmon are a vital subsistence fishery resource for subsistence users in the Bristol Bay Advisory Committee region and are also essential for the small scale commercial fisheries that provide income necessary to participate in subsistence hunting, fishing and gathering, and in many years there are not enough chum to provide for subsistence and commercial uses in Bristol Bay and for users throughout the Bristol Bay drainages; and

Whereas, chum salmon are caught as bycatch in the Bering Sea pollock fishery - in 2007 over 700,000 chum were taken as bycatch - and many of these salmon are discarded overboard since it is illegal for the trawl fishery to sell the bycatch and the quality of the bycatch is often not sufficient to deliver to food banks; and

Whereas, although the bycatch has fallen over the last few years, there is little in regulation to prevent extremely high bycatch to re-occur, and the North Pacific Fisheries Management Council (NPFMC) is in the process of developing regulations intended to "minimize salmon bycatch, to the extent practicable, while attempting to allow full harvest of the pollock total allowable catch"; and

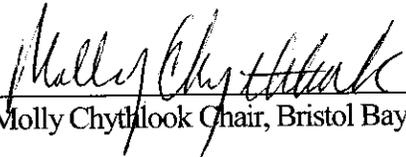
Whereas, the last time the NPFMC balanced these contradictory goals was in relation to the bycatch of Chinook salmon in the Bering Sea pollock fishery, and the outcome was extremely disappointing to subsistence users in Bristol Bay in that it continued to allow as many as 60,000 Chinook salmon to be caught annually as bycatch despite drastic subsistence and commercial fishery restriction on the Yukon River and failure to meet Chinook escapement and treaty obligations; and

Whereas, during the NPFMC Chinook salmon bycatch regulatory process the Federal Subsistence Board and the USF&WS recommended and strongly advocated for a bycatch level that was far below that adopted by the Council because of the FSB's obligation to ensure healthy salmon populations, subsistence opportunity and a priority for subsistence uses; and

Whereas, the NPFMC is meeting in Nome in June of 2011 and will adopt a preliminary preferred alternative for the regulation of chum bycatch at that time.

Now Therefore Be It Resolved that the Bristol Bay Regional Advisory Council recommends that the FSB work with affected regional advisory councils, tribes and communities to develop a position from among the alternatives before the NPFMC to regulate chum bycatch. The FSB position should seek to minimize chum bycatch to the greatest extent practicable and thereby ensure healthy fish populations and subsistence and small scale commercial fisheries. The FSB should officially convey this position to the NPFMC before or during the NPFMC meeting in June of 2011.

Dated this 10 day of March, 2011 at Naknek, Alaska.



Molly Chytlouk Chair, Bristol Bay Regional Advisory Council