

**YUKON RIVER DRAINAGE FISHERIES ASSOCIATION**

January 26, 2009

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

Mr. Doug Mecum, Acting Regional Administrator  
NOAA Fisheries, Alaska Region  
PO Box 21668  
Juneau, AK 99802

**Re: Agenda Item C-3 Salmon Bycatch**

Dear Mr. Olson, Mr. Mecum and Council members:

The Yukon River Drainage Fisheries Association (YRDFA) appreciates the opportunity to comment on the issue of salmon bycatch. YRDFA is an association of commercial and subsistence fishermen and women on the Yukon River in Alaska with a mission of promoting healthy, wild salmon fisheries on the Yukon River. Given the dire state of Yukon River Chinook salmon and salmon dependant communities, we urge the Council, as detailed below to:

1. Adopt a hard cap of no more than 32,500 immediately;
2. Establish a stair-stepped approach which further reduces the hard cap over time;
3. Develop and secure funding for research about Western Alaska salmon throughout their lifecycles;
4. Reject the industry incentive program proposals.

The state of Chinook salmon, and the communities who depend on them for sustenance and income, has deteriorated rapidly since the Council first began this action, and even since the last Council meeting. As you have heard, the 2008 Chinook salmon run was very poor on the Yukon River, as well as throughout Western Alaska. On the Yukon, subsistence fishing time was reduced by half in Alaska part way through the season, and people met 40 percent or less of their subsistence needs in some places. In Canada, subsistence (aboriginal) fishers voluntarily restricted themselves to half of their historic take. In one community these voluntary restrictions resulted in a total Chinook harvest of only 160 Chinook salmon. The aboriginal harvest for the entire Canadian portion of the run was 2,766 fish, based on preliminary data. There was no directed commercial Chinook salmon fishery on the Yukon in 2008, and the commercial chum fishery was delayed to allow Chinook to pass through, reducing the chum salmon harvest as well. Despite these restrictions, estimated Chinook salmon spawning escapement into Canada was only 32,700 fish, 27 percent below the Yukon River Panel agreed upon goal of 45,000 fish.

The outlook for this coming summer is no better: the Alaska Department of Fish and Game (ADF&G) and the U.S. Fish & Wildlife service are preparing users for further subsistence restrictions in 2009, and have already stated that it is unlikely that a commercial Chinook fishery will be allowed. Fishermen and women throughout the watershed are participating in teleconferences to develop management measures which can be used to restrict their own subsistence harvest to provide escapements to ensure healthy salmon runs in the future.

Yukon River Drainage Fisheries Association  
C-3 Salmon Bycatch  
Page 2 of 2

The weak Chinook salmon run of 2008 has already created problems of crisis proportions along the Yukon River. While subsistence restrictions limited the amount of food available for the winter, the lack of a commercial Chinook fishery cut off one of the only sources of income for many Yukon River residents. Cold winter temperatures and high fuel prices have made the lack of commercial fishery income even more drastic this season. The promise of the same or worse Chinook salmon return in 2009 is no comfort.

In light of the current state of Yukon River Chinook salmon and the salmon-dependant people of Western Alaska it is essential that this Council put a hard cap on Chinook salmon bycatch immediately. While any amount of bycatch is too much under these circumstances, we understand that the Council is required to balance the need to reduce bycatch with achieving yield from the pollock fishery. We therefore recommend the Council adopt a hard cap of no more than 32,500 immediately. This cap level will reduce bycatch to levels experienced before the Yukon River Salmon Agreement was signed, honoring our international commitments under this treaty and providing necessary protections to Chinook salmon throughout Western Alaska. The hard cap should be a declining cap, reducing salmon bycatch to levels below 32,500 over time while allowing the pollock fishery time to adapt their operations to these expectations. The Council should include in this action a commitment to develop and secure funding for research about Western Alaska salmon, including but not limited to genetic stock identification of salmon caught as bycatch, marine research such as the BASIS program and in-river management and enumeration. Research planning must involve Western Alaska and tribal groups and can provide a scientific basis from which to inform future actions as we learn more about Western Alaska Chinook salmon throughout their lifecycle.

In regard to the industry incentive programs, this Council should reject both proposals as neither can guarantee that it will achieve bycatch reduction to a level sufficient to warrant a cap of 68,000, more than twice that being recommended by many Western Alaska and tribal groups. While it is difficult to provide concrete comments due to the developmental status of the industry proposals, it is clear that both systems depend to some degree on the need for some boats to buy bycatch credits, or conversely a desire to keep bycatch levels down so as to avoid buying credits. It is apparent that a hard cap level of 68,000, based on historical data, will rarely be hit - only in 2006 and 2007 has that number been exceeded, even without the threat of a hard cap in place. Using the most basic market theory, there is little incentive to buy credits, or fear of losing them, when the hard cap is unlikely to be hit. Beyond this specific inadequacy, industry analysts themselves indicated at the recent salmon bycatch workgroup that they cannot guarantee that these programs will reduce bycatch!

Overall, with Yukon River Chinook suffering, and the people of the Yukon making enormous sacrifices in their own subsistence harvest and commercial fishery, it is imperative that the Council immediately puts in place a system which is guaranteed to reduce salmon bycatch in the pollock fishery. Only a hard cap set at 32,500 or below can provide the degree of protection required to allow Western Alaska Chinook salmon to recover. Thank you for your continued efforts on this issue. We look forward to working with you to reduce Chinook salmon bycatch in the Bering Sea pollock fishery.

Sincerely,



Rebecca Robbins Gisclair  
Policy Director