



Yukon Delta Fisheries Development Association

1016 West Sixth Avenue • Suite 301 • Anchorage • AK 99501

Tel: (907) 644-0326 Fax: (907) 644-0327

February 23, 2009

VIA E-MAIL, FAX AND FIRST CLASS MAIL

Mr. Robert D. Mecum, Acting Administrator, Alaska Region
NOAA Fisheries' National Marine Fisheries Service
PO Box 21668
709 W. 9th St., Rm 420
Juneau, Alaska 99802-1668

Re: Comment to Bering Sea Chinook Salmon Bycatch Management Draft Environmental Impact Statement

Dear Mr. Mecum:

Upon review of the Bering Sea Chinook Salmon Bycatch Management Draft Environmental Impact Statement (the "Draft"), we noticed the omission of any discussion regarding the impact of low returns of Chinook salmon to the Yukon River on the management of the summer chum commercial fishery in the Lower Yukon River. As the Draft states, the North Pacific Fishery Management Council's preferred alternative must comply with the Magnuson-Stevens Fishery Conservation and Management Act's National Standard 1, which requires that conservation and management measures prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.

Because low Chinook runs have affected the management of the summer Chum runs on the lower Yukon, as shown below, the preferred alternative must take into account that certain management measures currently being considered may preclude the optimum yield of the Yukon River summer chum fishery.

Yukon Delta Fisheries Development Association (YDFDA) is one of the six groups that participate in the Western Alaska Community Development Quota program. YDFDA represents six Western Alaska villages and more than 3,500 residents of Western Alaska. Our villages lie in the Wade Hampton census district, which is one of the poorest regions in the United States. Our residents rely on the ability to catch Chinook and chum salmon commercially, as this is one of the only ways residents can earn the necessary cash to participate in subsistence harvest, and rely on the actual subsistence fishery itself to feed their families through the year.¹

¹ "Commercial salmon fishing is the most important industry and source of cash income for Yukon Delta residents . . . The Yukon River from below Mountain Village to the mouth is the most important area for commercial salmon fishing. Virtually all residents here fish commercially each summer or work in the fish processing plants located at Emmonak and Alakanuk." See Alaska Planning group, U.S. Department of the Interior, Final Environmental Statement: Proposed Yukon Delta National Wildlife Refuge, at 92 (1973).



Yukon Delta Fisheries Development Association

1016 West Sixth Avenue • Suite 301 • Anchorage • AK 99501

Tel: (907) 644-0326 Fax: (907) 644-0327

The importance of the commercial fisheries to the lower Yukon *cannot* be overstated. Unlike other areas of the Yukon River that are closer to the urban centers or on the road system, Yukon Delta residents have extremely limited economic opportunities and have a hard time funding their subsistence activities as well as living expenses even in a year with an adequate commercial fishery. Without a commercial fishery, the hardship is multiplied. The food and fuel crisis in Emmonak this year is a perfect indication how badly a commercial fishery is needed to give our residents cash to meet their living expenses.

Kwik'Pak Fisheries, LLC, YDFDA's wholly owned subsidiary that buys, processes and markets Yukon River salmon, is located in Emmonak, Alaska. In 2007, Kwik'Pak provided more than 300 jobs to residents of the lower Yukon as well as purchased fish from over 500 permit holders. Kwik'Pak's combined 2007 wages and fish payments to area residents were over \$4 million dollars. Without Kwik'Pak as one of the only buyers of commercially caught salmon on the lower Yukon, it is unlikely that this infusion of cash to the lower Yukon region would exist.

Due to the projected small commercial Chinook fishery for 2008, and due to the above average projection for the chum fishery in 2008, Kwik'Pak made significant investments in equipment, personnel and national marketing to provide a chum market for the fishermen of the lower Yukon. These investments were made after consultation with ADF&G and its assurances of adequate commercial chum openings to realize this investment. Kwik'Pak was ready to buy every commercially caught chum salmon from area residents in 2008.

However, while the total estimated numbers of Yukon summer chum in 2008 were 1,665,667,² well above the escapement goal of 600,000, the total 2008 commercial harvest of summer chum salmon in the lower Yukon was only 123,598.³ There was a forgone commercial harvest of summer chums of close to 1 million fish, causing a large adverse economic impact on the residents of the lower Yukon, not to mention a potential environmental adverse affect due to over escapement of summer chums on the entire Yukon River drainage.

The reason for the 2008 forgone harvest was that ADF&G restricted commercial openings for summer chum due to the uncertainty about the Chinook run strength.⁴ Only six restricted mesh size openings were allowed by ADF&G in the Y-1 area of the lower Yukon and only five restricted mesh size openings in the Y-2 area of the lower Yukon. The first commercial summer chum opening was July 2 in Y-1 and July 4 in Y-2, well after the June 30 mid-point of the summer chum run. Indeed, 6 of the 11 commercial fishing openings allowed by ADF&G were after the July 8 third-quarter point of the summer chum run. With a summer chum return of this size, ADF&G normally would have allowed an active commercial fishery well before the June

² ADF&G, Division of Commercial Fisheries 2008 Preliminary Yukon River Summer Season Summary, October 20, 2008, <http://www.cf.adfg.state.ak.us/region3/finfish/salmon/catchval/08yuksalsum.pdf>.

³ In 2008, the total commercial harvest of Chinook was 4,641 fish for the entire US portion of the river (4,348 in the lower Yukon), well below the ten year average of 39,367.

⁴ 2008 Preliminary Yukon River Summer Season Summary, page 4.



Yukon Delta Fisheries Development Association

1016 West Sixth Avenue • Suite 301 • Anchorage • AK 99501

Tel: (907) 644-0326 Fax: (907) 644-0327

30 mid-point of the run. However, due to their extreme concern over the failed Chinook fishery, fearing that any Chinook would be caught in the summer chum fishery, ADF&G did not allow a summer chum commercial opening until after the bulk of the summer chum run had passed.

The economic impacts of this foregone harvest on the lower Yukon communities are stark. With a foregone harvest of one million summer chum, with an average weight of 6.7 pounds each, which Kwik'Pak was buying at \$0.50 per pound, this harvest would have resulted in \$3,250,000.00 in ex-vessel payments to area fishermen, not to mention a significant multiplier effect for foregone first wholesale value and foregone tax revenue income to Emmonak.

Simply put, the failure of the Chinook salmon runs on the Yukon River in 2008 prevented the harvest of a significant number of harvestable summer chum, resulting in foregone revenue of millions of dollars to our region and potentially causing an adverse environmental affect on the Yukon River drainage.

We ask that the National Marine Fisheries Service when finalizing the Draft to include the environmental and economic effects that low abundance Chinook management by ADF&G has on the optimum yield of the Yukon River summer chum fishery. We believe this information is necessary to provide the Council and other decision-makers, and the public, to properly evaluate the environmental, social, and economic effects of alternative management measures currently before the Council to minimize Chinook salmon bycatch in the Bering Sea Pollock fishery.

With regard to the alternatives under consideration in the Draft, YDFDA supports a hard cap on the Pollock fishery of 47,591 salmon. We feel that a hard cap at this level strikes a balance of allowing the Pollock fishery a chance to harvest their Pollock (National Standard 1) while at the same time takes into consideration the long term health of the Chinook salmon thus minimizing bycatch to the extent practicable (National Standard 9). There have been only two times in the past 20 years when a proposed cap of 68,292 Chinook would have been exceeded. YDFDA believes that a cap of 68,392 is not reasonable or prudent.

In addition, YDFDA does not support a two tiered cap even if an “incentive” program is in place as proposed by the Council’s preferred alternative. The incentive programs YDFDA has reviewed to date do not provide adequate incentives for the Pollock fishery to change their behavior. Moreover, a higher hard cap of 68,392 is too high in low Chinook abundance years and can have a negative effect on Chinook salmon stocks. In addition, the proposed incentive programs that will be before the Council and NOAA Fisheries when they take final action, will not necessarily be the incentive programs that the industry submits prior to implementation of Amendment 91.

With respect to sector allocations under a hard cap, YDFDA supports each sector of the Pollock industry being allocated a pro rata percentage of Salmon relative to their percentage of the target fishery. However, allocating salmon based on 75% salmon bycatch history and 25% AFA



Yukon Delta Fisheries Development Association

1016 West Sixth Avenue • Suite 301 • Anchorage • AK 99501
Tel: (907) 644-0326 Fax: (907) 644-0327

Pollock amounts under the PPA, allows some of the sectors in the industry with the highest salmon bycatch a higher portion of the proposed salmon allocation. At the very least the PPA weighted sector allocation formula should be reversed to 75% AFA Pollock percentage and 25% salmon bycatch history.

Thank you for your attention to the requests contained herein.

YUKON DELTA FISHERIES DEVELOPMENT ASSOCIATION

Sincerely,

Ragnar Alstrom, Executive Director

cc: Commissioner Denby Lloyd, Alaska Department of Fish and Game
Governor Sarah Palin, State of Alaska
Chairman Eric Olson, North Pacific Fishery Management Council