

STATE OF ALASKA

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DEPARTMENT OF FISH AND GAME

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February 23, 2009

Doug D. Mecum
Acting Administrator
Alaska Region, National Marine Fisheries Service
National Oceanic and Atmospheric Administration
P.O. Box 21668
Juneau, AK 99802

E-mail: salmonbycatcheis@noaa.gov

Dear Mr. Mecum:

Thank you for the opportunity to provide comments on the Bering Sea Chinook Salmon Bycatch Management Draft Environmental Impact Statement/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (DEIS/RIR/IRFA).

As you are aware, the Alaska Department of Fish and Game (department) is a cooperating agency on this analysis and has provided its considerable expertise on Chinook salmon management in Alaska. We have also worked closely with staff from the National Marine Fisheries Service (NMFS) and the North Pacific Fishery Management Council (NPFMC) in preparation of major sections of this document. This DEIS is a formidable document, prepared within tight time constraints. We find that the document adequately provides alternatives available to address Chinook salmon bycatch by the Bering Sea pollock trawl fleet, recognizing constraints and limitations on developing a quantitative assessment of impacts. Analysis is limited by an incomplete understanding of the stock of origin and age distribution of the Chinook salmon taken as bycatch in the Bering Sea pollock fishery; interactions between pollock and Chinook salmon; relationship of Chinook salmon encounters in the pollock fishery with abundance; and expected changes and effect of changes in the behavior of the pollock fleet operating under bycatch management measures. The document effectively highlights these areas of incomplete understanding and relies on reasonable methods to inform decision makers and the public.

We commend the authors for their comprehensive work and have offered suggestions for improving the document throughout its development. We expect public comment to identify further needs for expansion and look forward to assisting the NMFS and NPFMC staff in responding to comments and in preparing the final draft. Specifically, we have identified a need to provide more analysis on subsistence use and the importance of Chinook salmon to the people of Western Alaska.

Chinook salmon are a fully allocated species, vitally important to subsistence, commercial, and recreational users throughout Alaska. They remain a cornerstone resource in meeting the needs of rural Alaskans, and have been the foundation of subsistence and commercial economies in remote Alaska for many generations. We look forward to taking a significant step toward resolving the

critical concern of Chinook salmon taken as prohibited species bycatch, while realizing the benefits provided to the state by healthy pollock resources off Alaska. Further work is needed to improve stock of origin and age distribution estimates of Chinook salmon taken in the pollock fishery and to better understand the relationship of Chinook salmon encounters in the pollock fishery with abundance. We expect to work cooperatively to further examine these issues.

Working within constraints of unknowns and recognizing the NMFS Comment Analysis Report will bring additional information to the NPFMC, we are confident the NPFMC will have sufficient information in April to take action to reduce Chinook salmon bycatch in the Bering Sea pollock trawl fishery.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denby S. Lloyd". The signature is fluid and cursive, with a large loop at the end.

Denby S. Lloyd
Commissioner