



March 26, 2013

Senator Peter Micciche
Alaska State Senate
State Capital, Room 125
Juneau, Alaska 99801-1182

Re: Support for Senate Resolution 5

Dear Senator Micciche:

The Alaska Marine Conservation Council is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans.

The Alaska Marine Conservation Council strongly supports SR 5, requesting the North Pacific Fishery Management Council (the Council) to take action to reduce Chinook salmon bycatch in the Gulf of Alaska and Bering Sea trawl fisheries by setting new limits and lowering existing limits. Chinook salmon is critical to subsistence, sport and commercial fisheries, and a major contributor to the economy and culture of Alaska. As Chinook salmon populations suffer throughout Alaska, it is critical that bycatch of our state fish is reduced.

In recent years, Chinook salmon have declined severely throughout Alaska, and as a result commercial fishery failures and disasters were declared for the Upper Cook Inlet in 2012, Yukon River (2008-2012) and Kuskokwim River (2011-2012). Seven Chinook salmon stocks, including Yukon River, Norton Sound subdistricts 5 and 6 and several Upper Cook Inlet stocks are listed by the Alaska Board of Fisheries as stocks of concern. There are no directed commercial harvests of Chinook salmon on the Yukon. Subsistence fisheries on the Yukon River have been severely restricted for years and subsistence was dramatically restricted on the Kuskokwim River in 2012 as well. Despite these restrictions and sacrifices on the part of subsistence users, many escapement goals were still not met.

In Upper Cook Inlet, Chinook salmon runs were so poor that the Secretary of Commerce declared a fisheries disaster. The setnet fishery was almost completely shut down, and the Kenai River was closed to all recreational Chinook salmon fishing for part of the season. Economic losses were estimated at almost \$27.7 million to commercial fisheries and direct and indirect losses to sport fisheries.

In the midst of these significant declines, allowable bycatch amounts of Chinook salmon in federal trawl groundfish fisheries remain at unacceptably high levels. Some fisheries

still do not have any limits on Chinook bycatch, such as the Gulf of Alaska non-pollock trawl fisheries. These loopholes need to be closed and current bycatch measures in place for Chinook need to be reexamined. Current bycatch caps in the Gulf and Bering Sea by should be reduced at least half in light of these declines. Fisheries without bycatch limits must have meaningful caps implemented in a timely manner. As the Council considers sweeping fishery management plan revisions in the Gulf of Alaska trawl fisheries to reduce bycatch of all species, significant and meaningful bycatch reductions need to be built in upfront in the program.

While bycatch is not the only source of the decline, it is critical to reduce all sources of mortality that are controllable in times of low abundance. Bycatch is a direct and controllable source of mortality for Chinook salmon in Alaska. A Chinook salmon bound for an Alaskan system which is not meeting its' escapement goals carries great value to that system. While all other users have to reduce their harvest to protect Chinook salmon in years of low returns, often at great cost, the trawl fisheries must do the same.

In order to gain an accurate and comprehensive understanding of the impacts and levels of bycatch in federal groundfish fisheries, a minimum of 100% observer coverage should be required in all trawl fisheries. The long awaited restructured observer program has resulted in an astoundingly low coverage rate of 14-15% in the fisheries that have the highest bycatch of Chinook salmon in the Gulf of Alaska. This coverage rate does not provide adequate monitoring to provide confidence in the accuracy of the bycatch numbers.

Action to reduce mortality of Chinook salmon in the federal arena is a slow process and it is critical that the Council hears from our State legislature that federal groundfish fisheries must take responsibility to reduce the impact of bycatch on struggling Chinook stocks. The Council's actions have a direct impact on the state of our salmon returns, which are critical to the economy, culture and communities of Alaska. It is critical that the State of Alaska takes a leadership role in advocating for the health of Chinook stocks and supporting bycatch reductions. The Alaska Marine Conservation Council strongly supports SR 5 and encourages State leaders to advocate for management measures to reduce Chinook bycatch in the Gulf of Alaska and Bering Sea trawl fisheries.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Harrell". The signature is written in black ink and is positioned above the typed name and title.

Kelly Harrell
Executive Director