

February 17, 2009

Robert Mecum, Acting Administrator

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802

NATIONAL MARINE FISHERIES SERVICE  
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Dear Mr. Mecum:

We are subsistence salmon fishermen from the Norton Sound region, fishing actively for about 25 years here, and are contributing our comments regarding the four options proposed to reduce Chinook salmon by-catch by the Bering Sea pollock fishery. We already wrote the Council our concerns about by-catch earlier this year, and we are pleased that they came to Nome to present the options and to hear testimony last month.

We favor a hard cap on by-catch for the following reasons. In looking at any of these options, the first consideration must be the preservation of salmon runs. Of the fisheries, subsistence salmon fisheries in Western Alaska must be first priority, and commercial salmon fisheries, where they exist, should be second priority. Third priority should be preserving the profits of the pollock fishery. This is not meant in any way to disregard the success of the pollock industry, which also benefits Western Alaska much, but because of more wide-reaching long-range benefits of the subsistence fishery to the resident families, and the fragility of this harvest. We cannot know what the future of the pollock harvest will be, or its market. But we do know that the Western Alaska families, economically and culturally, have a huge investment in the Chinook (and other salmon) runs (as do the Canadian subsistence communities on the Yukon) and that these runs must continue to be there for them. Even though we applaud the CDQ program and see many values from it, there is no economic benefit coming into the regions, from CDQs or other sources, that could in the foreseeable future override this need to protect salmon and rebuild runs. There are also other salmon stocks mingled in the Bering Sea, some of them protected stocks from areas with serious run depletions (B.C., WA, OR, CA) affecting those fishing families, from both tribal and non-tribal fisheries.

We understand that the serious reduction in Chinook salmon runs is caused by multiple factors, not just by-catch, and we understand that the pollock fleet would be happy not to have by-catch. But by-catch has been recognized for years as a big problem, and not enough progress has been made toward solving it. The pollock industry has been enormously profitable and can afford to do more determined research in how to overcome its by-catch problem.

In the meantime, the salmon fishermen have been cut back seriously for years, to the point of complete closure for Chinook in some districts this year. In other words, the solutions to the by-catch problem

have not been fairly applied in the past, as the strategies proposed for the pollock fishery, such as rolling hot-spots, have not been successful, but salmon fishermen have been successfully stopped from harvesting. In Nome sub-district we subsistence fishermen were forced to go to Tier II for chum salmon for five or so years recently, and we must not see this happen for western Alaska Chinook. We subsistence fishermen have had years of "hard caps", in effect, beginning in the late 1980s.

Therefore, we recommend a pollock fleet by-catch level of about 45,000 for 2010-2011 with hard cap. However, if/when the escapement of Chinook all along the coast returns to the biologically acceptable level for a period, as recommended by AK Fish and Game scientists, then the allowable by-catch levels could also be raised in a safe proportion. If there is a hard cap level on each boat, based on its pollock quota, there should be no increased problem of a race for fish. We do not have recommendations regarding transferring of quota from A to B seasons as we don't have enough technical information on that. We do not favor locked-in targeted area closures because there is too much noticeable movement of pollock stocks to make that feasible.

We need to look very seriously at the long-term health of the salmon stocks, and for that reason we don't like Option 4 that allows trading of by-catch quotas. This form of cooping gives boats the opportunity to sell their unused by-catch quota to boats less successful at avoiding by-catch and encourages less committed boat owners to not try harder to solve their problem. Instead they rely on other boats to sell them leftover quota. The overall by-catch is reduced, so there is a short-term gain, but there is no long-term gain through a serious commitment by the boats to conservation of salmon (and other) stocks. This is what we must all share if we want fisheries in the future. Business agreements that trade quota back and forth with profits in mind will not get us there.

We would also like to see pollock boats be rewarded for reduced by-catch, if it could have a long-term benefit for all the fisheries, not just for them. Rewards make sense. However, experimentation by the pollock industry that successfully reduces by-catch should be its own reward when it prevents them from going over their hard cap. We also have not received any more information about what other "rewards" are being considered by the pollock fleet, so we can't comment on whether these would be successful, or fair, or not. If the fleet wants to create a fund of its own from dockside fees they collect to reward boats with low by-catch, such as is done with vessel buy-backs, that is worth trying.

In closing, we have told you our reasons for insisting on making salmon stocks protection first priority along with subsistence salmon harvests, for favoring hard caps for the pollock fleet, for not recommending by-catch quota-sharing coops, and for favoring any kind of rewards that the pollock fleet wishes to sponsor for itself that will encourage experimentation in methods of by-catch reduction.

Sincerely,

  
Perry and Nancy Mendenhall

P.O. Box 1141, Nome, Alaska 99762 907-443-2455 [ptmen@alaska.com](mailto:ptmen@alaska.com)

CC: KPEUC, BSFAAK, USEDC, Kowatuk, Inc., Nome Eskimo Community