



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

*National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668*

March 15, 2012

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501-2817

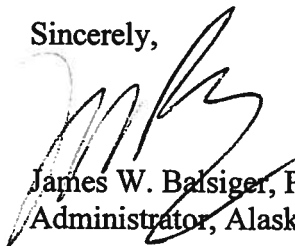
Dear Chairman Olson:

Enclosed are the following documents related to two tribal consultation meetings in 2011 between the National Marine Fisheries Service (NMFS) and Alaska Native tribes from the Norton Sound region about chum salmon bycatch:

1. A report of the June 1, 2011, tribal consultation meeting, including a copy of one of the resolutions we received from the tribes about chum salmon bycatch.
2. NMFS's June 6, 2011, letter summarizing the consultation meeting.
3. A report from the October 6, 2011, follow-up teleconference with tribal representatives at which staff provided an update on the analysis and more information about the prohibited species donation program.

NMFS staff will be available at the upcoming North Pacific Fishery Management Council meeting to answer any questions the Council may have about the tribal consultation meetings or these documents.

Sincerely,



James W. Balsiger, Ph.D.
Administrator, Alaska Region

Enclosures



**Summary of
Tribal Consultation Teleconference on
Chum Salmon Bycatch in the Bering Sea Pollock Fishery
June 1, 2011**

In Attendance

Attending via telephone:

Native Village of Elim/Elim IRA Council

Robert Keith, President

Sheldon Naguruk, Council member

e-mail: jmurray@kawerak.org (Janelle Murray, Tribal Coordinator)

Native Village of Gambell

Iver Campbell, IRA Council President

e-mail: ivercampbell@yahoo.com

Native Village of Savoonga

Ronnie Toolie, President (stoolie@kawerak.org)

Peggy Akeya (peggyakeya@yahoo.com)

Verna Immingan

Native Village of Shishmaref/Shishmaref IRA Council

Donna Barr, Vice-President

Howard Weyiouanna, Sr.

e-mail: knayokpuk@kawerak.org; tc.shh@kawerak.org (tribal coordinators)

Native Village of Teller/Teller Traditional Council

Wesley Okbaok, President

Joe Garnie

e-mail: cisabell@kawerak.org

Mary's Igloo Traditional Council

Albert W. Oquilluk

e-mail: [cablowaluk@kawerak.org](mailto:cablowluk@kawerak.org)

Kawerak, Inc.

Julie Raymond-Yakoubian

e-mail: JRaymond-Yakoubian@kawerak.org

Attending in person, NMFS Alaska Regional Office:

Doug Mecum, Deputy Regional Administrator, NMFS Alaska Region

Glenn Merrill, Assistant Regional Administrator, NMFS, Sustainable Fisheries Division

Sally Bibb, NMFS, Sustainable Fisheries Division (907-586-7389)

Melanie Brown, NMFS Sustainable Fisheries Division

Mary Grady, NMFS Sustainable Fisheries Division

Sarah Ellgen, NMFS Sustainable Fisheries Division

Gabrielle Aberle, NMFS Sustainable Fisheries Division (907-586-7356)

Scott Miller, NMFS, Analytical Team and co-author on chum salmon bycatch analysis

John Lepore, NOAA General Counsel

Demian Schane, NOAA General Counsel

Summary

The six Norton Sound and Bering Strait tribes listed above requested a consultation on chum salmon bycatch in the Bering Sea pollock fishery. Each tribe had submitted to the National Marine Fisheries Service (NMFS) a written resolution stating its position on chum salmon bycatch and a separate resolution requesting a permanent ban of all bottom trawling in the Northern Bering Sea Research Area. The consultation between the NMFS and representatives of the six tribes was conducted under Presidential Executive Order 13175. Julie Raymond-Yakoubian also participated in the consultation.

Sally Bibb opened the meeting by introducing those present at the NMFS Alaska Regional Office, then asked for an introduction from each tribal representative. Sally Bibb asked if any of the representatives had questions, but none did at that time. She then presented an overview of the chum salmon bycatch issue and asked the representatives to share their concerns and questions. The following issues were raised by the tribal representatives.

- All six of the tribes requested the North Pacific Fishery Management Council (Council) adopt a hard cap of 30,000 chum salmon for the Bering Sea pollock fishery. On reaching the hardcap, the pollock fishery should be closed and no sector allocations, sector transfers, or cooperative provisions allowed. This request is in response to the continuing decline of regional salmon stocks, which has severely impacted the tribes' subsistence practices and traditions.
 - Response: In a letter dated June 6, 2011, NMFS provided the Council with a preliminary summary of the issues discussed at the consultation. NMFS requested the Council address the recommendation for a 30,000 hard cap by either including it in the alternatives analyzed or providing an explanation why this suggested cap does not meet the purpose and need for the action, and therefore, will not be included in the alternatives analyzed. A copy of this letter is enclosed with this report.

The Council discussed the tribes' resolutions at its June 2011 meeting and asked for additional information about the reasons that the tribes recommended a 30,000 hard cap. NMFS will schedule a teleconference with interested Norton Sound and Bering Strait tribes in September 2011, or as soon as all interested parties are available to further discuss the tribes' recommendations on chum salmon bycatch.

A summary of the Council's June 2011 action on chum salmon bycatch is enclosed with this report.

A copy of the Council's revised set of alternatives and schedule for future analysis and discussion of chum salmon bycatch will be provided to the tribes as soon as it is available from the Council.

- An agenda for the June Council meeting in Nome was requested.
 - Response: After the consultation, the link to the Council meeting agenda was emailed to representatives of the tribes who participated in the consultation.
- Several representatives requested information about the prohibited species donation program (PSD) program and expressed interest in participation in the program by western Alaska communities.

- **Response:** The PSD program allows for the distribution of salmon and halibut caught accidentally in the groundfish trawl fisheries to hunger relief organizations. NMFS will provide additional information about the PSD program at its next teleconference with interested Norton Sound and Bering Strait tribes. We can discuss at that time whether any tribes are interested in further follow-up on this program.
- Several representatives noted that salmon have cultural value, not just economic value, and tribes would rather catch fish than acquire them from a food bank. Salmon are nutritionally very important to tribal members. The idea of wasting food is offensive to Alaska Natives. A food bank should not be used to justify salmon bycatch.
 - **Response:** NMFS appreciates the comments about the cultural significance of salmon. Salmon are prohibited species and are required to be avoided. The purpose of the PSD program is to try to use salmon, which has already been caught and killed, for human consumption, if that salmon has been maintained in the appropriate condition. A relatively small proportion of the salmon bycatch is of the size or quality appropriate for human consumption. Therefore, few salmon are donated to the PSD program. Most salmon are discarded after they have been counted and biological samples have been taken from them.
- Several representatives described environmental changes they have observed in recent years. These include larger fish, more king crabs washing ashore, fish moving north, and a decline in the salinity of some river waters.
 - **Response:** NMFS notes these observations. We have limited data on the effects of environmental change on salmon and bycatch. Current salmon bycatch data collection and research focuses on using genetics to identify geographic origin of salmon caught as bycatch.
- One representative asked about the effects of radioactive water from Japan's Fukushima Daiichi nuclear power plant on fish off northwest Alaska.
 - **Response:** Some information from the U.S. Food and Drug Administration is enclosed with this report. This information is available on the internet at: <http://www.fda.gov/NewsEvents/PublicHealthFocus/ucm247403.htm>.
- Red salmon returns in Salmon Lake have been insufficient in recent years to provide food for the people.
 - **Response:** Bering Sea bycatch includes only a small amount of red salmon, pink salmon, and coho salmon. Therefore, it is unlikely that salmon bycatch in the Bering Sea trawl fisheries are impacting red salmon returns to western Alaska. However, NMFS will forward a copy of this report to the Alaska Department of Fish and Game so that they are aware that this issue came up in this tribal consultation.
- One representative asked if hatchery eggs can cause cancer.
 - **Response:** Doug Mecum responded that he is not aware of cancer resulting from hatchery fish. Hatchery practices are stringent about the use of chemicals. Fish live at the hatchery about a year and spend most of their life in the ocean.

- Multiple factors can lower salmon returns, and some cannot be controlled. Consequences of some industries (e.g., shipping, mining) are not clear, but bycatch can be controlled.
 - **Response:** The Magnuson-Stevens Fishery Conservation and Management Act requires that bycatch be minimized to the extent practicable. The Council's objective for its Chinook salmon bycatch management measures was to provide incentives to minimize Chinook salmon bycatch while still allowing the pollock fishery to continue. The Council's program does not set as a goal allowing the pollock fishery to harvest up to the hard cap of Chinook salmon.

Thus far in 2011, the first year of the new Chinook salmon bycatch management program, Chinook salmon bycatch is about 7,400 fish. If the Council's chum salmon bycatch management program involves a hard cap, the focus also will be to minimize bycatch rather than establish the hard cap as an acceptable level of bycatch.

- Representatives commented on science and research needs in the area and an interest in collaborative research and funding for the tribes and non-profit corporations. Questions were asked on the cumulative impact of salmon interception in the False Pass salmon fisheries, what information do we get from Russia, and the percent of fisheries taxes that is used for science. Tribes and non-profit corporations should have access to fisheries taxes for their science and research needs.
 - **Response:** Some of these issues may be addressed in the analysis being prepared by Council and NMFS analysts about chum salmon bycatch in the Bering Sea pollock fishery. NMFS will provide these questions to those analysts and follow-up with the tribes with any further information we obtain.
- Representatives asked how the Council and NMFS are working together to address tribal concerns and what steps NMFS is taking to provide information and education to the tribes on fisheries issues, the Council process, and the agency process.
 - **Response:** The Council created its Rural Community Outreach Committee to improve communication and outreach to residents of rural Alaska about fisheries conservation and management issues under consideration by the Council. The Council also has conducted extensive outreach efforts over the last three years on salmon bycatch in the Bering Sea pollock fishery. The outreach plans, which include meetings in rural communities, attending regional conferences, and mailings to all villages, tribes, and local government officials, have been developed by and vetted through the committee and several rural stakeholder groups. The outreach plans are presented to the Council and public at multiple meetings, and the results of the outreach are part of the analytical document on which the Council bases its decision. NMFS staff participates in the Council's committee meetings and outreach efforts.

The University of Alaska's Sea Grant College Program has provided short courses in Nome, Kotzebue, and Togiak about the National Environmental Policy Act (NEPA) with particular focus on fisheries management issues and process. These courses were offered, in part, due to the requests from people in rural communities for education and training about NEPA and the fisheries management process. NMFS staff participated in the Nome and Kotzebue courses.

NMFS contacts by letter all tribes, Alaska Native corporations, and local government officials about fisheries management issues and proposed rule that may be of interest to rural Alaskans. These letters specifically notify the tribes of their opportunities to consult under E.O. 13175. When requested to conduct a consultation, NMFS organizes and participates in the tribal consultations and follow-up meetings. NMFS staff also participate in meetings and regional conferences when requested to do so and when time and budget resources allow that participation.

- NMFS should hire a tribal liaison.
 - Response: NMFS acknowledged the tribes request that it hire a tribal liaison. However, at this time, funding for such a position cannot be prioritized over other responsibilities of the Alaska Regional Office.

Other Issues

In mid-June 2011, NMFS received letters and resolutions from:

Darin Douglas, President, Native Village of Koyuk
Shirley Martin, President, Native Village of St. Michael

They requested a tribal consultation on chum salmon bycatch and provided copies of resolutions on bycatch and trawling in the northern Bering Sea.

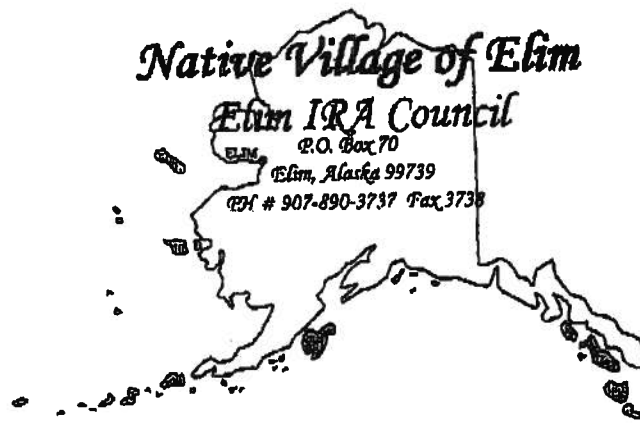
- Response: NMFS responded by phone and in writing to Mr. Douglas and Ms. Martin to let them know about the June 1 consultation, that we would provide them a copy of the consultation report, and include them in future meetings or consultations on chum salmon bycatch.

NMFS also will identify contact names and e-mail addresses for the following tribes so that they can be sent a copy of the final consultation report and notified of future discussions with Norton Sound or Bering Strait tribes about chum salmon bycatch:

Brevig Mission Council	Shaktoolik Stebbins
Diomedes	Unalakleet
Golovin	Wales
King Island	White Mountain
Nome Eskimo Community	

Senator Donny Olson wrote to the Secretary of Commerce (June 10, 2011) and requested to be informed of NMFS's future consultations with Native villages in his district and to be kept apprised of the Department of Commerce's actions and recommendations under E.O. 13175.

- Response: NMFS Alaska Region staff contacted Senator Olson's aide Loren Peterson on June 10, 2011, and provided a verbal overview of the June 1 tribal consultation. NMFS will discuss with the tribes what additional information to send to Senator Olson's office in the future and whether to also send copies of tribal consultation information to others in the Alaska Legislature.

**RESOLUTION 11-15****POSTION ON CHUM BYCATCH MANAGEMENT BY THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL**

WHEREAS: The Native Village of Elim is a federally recognized tribe; AND

WHEREAS: Subsistence users throughout the Norton Sound and Bering Strait Region are gravely concerned with the continuing decline of regional salmon stocks; AND

WHEREAS: Norton Sound is not making escapement goals therefore there has not been a large commercial fishing for chum in Norton Sound since 1985; AND

WHEREAS: Elim, white Mountain, Golovin, Nome rivers have stocks of concern and chum closures; AND

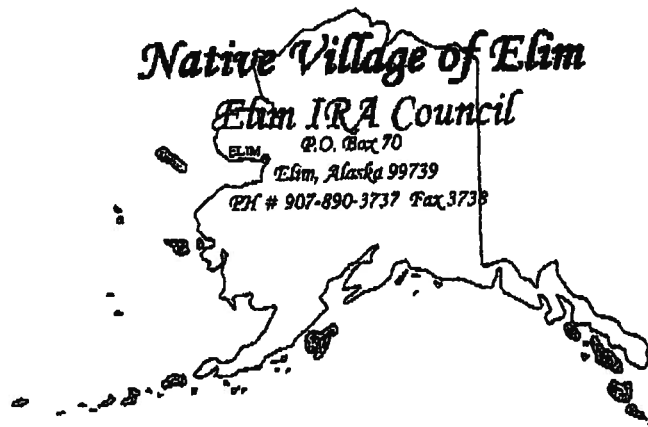
WHEREAS: While our subsistence users face severe restrictions regarding harvest of chum salmon, federal and state managed commercial fisheries continue to harvest huge numbers of chum salmon bound for our region's rivers; AND

WHEREAS: the Board of Fish (BOF) and North Pacific Fishery Management Council (NPFMC) both are responsible for regulations which affect Western Alaska salmon stocks and those fisheries which intercept salmon bound for our rivers; AND

WHEREAS: regulations developed by these two bodies have placed the future of our declining salmon runs in severe jeopardy, while perpetuating wasteful practices by some commercial fisheries that intercept our salmon with impunity and disregard; AND

WHEREAS: the National Marine Fisheries Service (NMFS) noted in the Bering Sea Salmon Bycatch Environmental Impact Statement (EIS) prepared in 2008, *"The first priority for management is to meet spawning escapement goals to sustain salmon resources for future generations. Highest priority use is for subsistence under both State and Federal law. Surplus fish beyond escapement needs and subsistence use are made available for other uses."* AND

WHEREAS: while subsistence needs are listed as the first priority under both state and federal management systems, our regions subsistence fisheries have been given the lowest priority by fisheries



managers in direct conflict with mandated subsistence priority. Commercial fishing interests have been consistently favored by government fisheries managers at both state and federal levels; AND

WHEREAS: Federal actions are supposed to keenly describe and critique cumulative impacts (via Area M interception and Polluck bycatch) and the public is due that information; AND

WHEREAS: once salmon become "bycatch" in other fisheries, they will never reach our streams to spawn or be available to the families who depend upon them for basic subsistence needs; AND

WHEREAS: our Inupiat, Yupik and St. Lawrence Yupik cultures and traditions are based on hunting, fishing and living off the land, sea and air; we want to maintain our subsistence practices and traditions and we prefer our subsistence foods over store bought food; AND

WHEREAS: our culture is not disposable or replaceable, our subsistence needs are no less important than offshore commercial fisheries. Existing management regimes refuse to recognize this and their neglect, lack of protection and mismanagement of our fisheries stocks has severely impacted our ability to carry on our subsistence practices.

NOW THEREFORE BE IT RESOLVED: the Native Village of Elim does hereby request that the North Pacific Fishery Management Council institute a hard cap of 30,000 chum bycatch and that the Polluck fishery is closed upon reaching the hard cap with no sectors allocations, no sector transfers, no cooperative provisions.

By: *Robert A. Katt*

CERTIFICATION

I, the undersigned Secretary of the Native Village of Elim, hereby certify that the foregoing resolution was adopted by majority vote of the during a duly called meeting on this 18th day of May 2001.

By: *Wallace Smith*



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

June 6, 2011

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. Fourth Avenue, Suite 306
Anchorage, Alaska 99501

Dear Chairman Olson:

This letter provides a preliminary summary of the issues discussed at a tribal consultation on June 1, 2011, about chum salmon bycatch in the Bering Sea pollock fishery. The consultation between the National Marine Fisheries Service (NMFS) and representatives of six Norton Sound and Bering Strait area tribes was conducted under Presidential Executive Order (E.O.) 13175. The following tribes participated in the consultation: Native Village of Teller, Native Village of Shishmaref, Native Village of Savoonga, Mary's Igloo Traditional Council, Native Village of Gambell, and the Native Village of Elim. Julie Raymond-Yakoubian with Kawerak, Inc., also participated in the consultation.

Each of these tribes submitted to NMFS a written resolution stating its position on chum salmon bycatch. The North Pacific Fishery Management Council (Council) has received a copy of these resolutions, and they are part of the information you are considering at your June 2011 meeting. The tribes emphasized the cultural and nutritional significance of salmon, the importance of the subsistence use of salmon, and concerns with the status of some chum salmon stocks.

All six of the tribes we consulted with requested that the Council adopt a hard cap for the Bering Sea pollock fishery of 30,000 chum salmon. This cap currently is not within the range of the hard caps that the Council is considering. NMFS is required under E.O. 13175 to prepare a tribal summary impact statement to accompany rulemakings that summarizes the nature of concerns identified by the tribes and extent to which these concerns have been met. In addition, regulations governing the National Environment Policy Act process require NMFS to identify alternatives that were eliminated from detailed study and briefly discuss the reasons why these were eliminated (40 CFR 1502.14(a)). It would greatly help NMFS fulfill these responsibilities if the Council would address the tribes' recommendation for a 30,000 chum salmon cap by either including this recommendation in the alternatives analyzed or providing an explanation why this suggested cap does not meet the purpose and need for the action and, therefore, was not included in the alternatives analyzed.

We also discussed the prohibited species donation (PSD) program. Several tribal representatives requested additional information about this program and expressed interest in participation in the program by western Alaska communities. We will provide additional information to the tribal

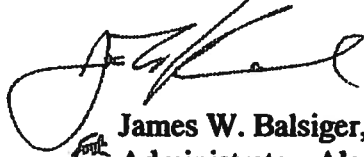


representatives, and we will organize a follow-up meeting between interested tribal representatives and people knowledgeable about the PSD program.

In addition to these two issues, we also discussed environmental changes tribal members have observed in recent years, science and research needs in the area, interest in collaborative research and funding for tribes and regional non-profit corporations to conduct research activities, and the cumulative impact of salmon interception in the False Pass salmon fisheries and salmon bycatch in the pollock fisheries. We also received questions about how NMFS and the Council are working together to ensure that tribal concerns are addressed, what steps NMFS is taking to provide information and education about fisheries issues to the tribes, and the status of the tribes' request that NMFS hire a tribal liaison.

A more detailed report of the consultation is being prepared by NMFS staff and will be sent to the Council when it is completed.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Balsiger', with a large, stylized flourish at the end.

James W. Balsiger, Ph.D.
Administrator, Alaska Region

cc: Representatives of the tribes that
participated in the June 1, 2011, consultation

Julie Raymond-Yakoubian

**Summary of Follow-up Teleconference
for the June 1, 2011, Tribal Consultation
on Chum Salmon Bycatch in the Bering Sea Pollock Fishery**

October 6, 2011

In Attendance

Attending via telephone:

Native Village of Brevig Mission
Stuart Tocktoo, President
Leonard Adams
Floyd Olanna
Walter Seetot
Inez Tocktoo

Native Village of Savoonga
Mitchell Kiyuklook, President
Peggy Akeya
Merton Miklahook, Sr.
Ronnie Toolie
Gregory Toolie

Native Village of St. Michael
Charlie Fitka

Nome Eskimo Community
Mike Sloan

Kawerak, Inc.
Rose Fosdick
Julie Raymond-Yakoubian

North Pacific Fishery Management Council
Nicole Kimball
Diana Stram (diana.stram@noaa.gov), co-author of non-Chinook (chum) salmon bycatch analysis

Office of Senator Donald Olson
Laura Lawrence
Loren Peterson
David Scott

Office of Representative Neal Foster
Paul LaBolle

Attending in person, NMFS Alaska Regional Office:

Sally Bibb, NMFS, Sustainable Fisheries Division (sally.bibb@noaa.gov; 907-586-7389)
Melanie Brown, NMFS Sustainable Fisheries Division
Mary Grady, NMFS Sustainable Fisheries Division
Sarah Ellgen, NMFS Sustainable Fisheries Division
Gabrielle Aberle, NMFS Sustainable Fisheries Division (gabrielle.aberle@noaa.gov; 907-586-7356)
Scott Miller, NMFS, Analytical Team and co-author of non-Chinook (chum) salmon bycatch analysis
Demian Schane, NOAA General Counsel

Summary

This teleconference responded to issues raised during a tribal consultation conducted on June 1, 2011, between the National Marine Fisheries Service (NMFS) and six Norton Sound and Bering Strait tribes. Each tribe had submitted to NMFS a written resolution stating its position on chum salmon bycatch and a separate resolution requesting a permanent ban of all bottom trawling in the Northern Bering Sea Research Area. The tribes requested the North Pacific Fishery Management Council (Council) adopt a hard cap of 30,000 chum salmon for the Bering Sea pollock fishery. The tribes emphasized the cultural and nutritional significance of salmon, the importance of subsistence use of salmon, and concerns with the status of some chum salmon stocks.

Representatives from the Native Village of Elim/Elim IRA Council, Native Village of Gambell, Native Village of Savoonga, Native Village of Shishmaref/Shishmaref IRA Council, Native Village of Teller/Teller Traditional Council, Mary's Igloo Traditional Council, and Kawerak, Inc., participated in the consultation, which was conducted under Presidential Executive Order 13175. NMFS did not receive the resolutions submitted by the Native Village of Koyuk IRA Council and the Native Village of St. Michael until after June 1; therefore, these tribes were not notified of the consultation until after it occurred. The Native Village of Koyuk IRA Council and the Native Village of St. Michael, as well as other tribes in the Norton Sound and Bering Strait area, the June 1 participants, and staff from the offices of Senator Donald Olson and Representative Neal Foster were invited to attend the teleconference held on October 6, 2011. The purpose of the teleconference was to update the tribes on the analysis and to follow-up on questions from the June 1, 2011, consultation about the prohibited species donation program.

Sally Bibb opened the meeting by introducing those present at the NMFS Alaska Regional Office, then asked for an introduction from each participant that called in to the meeting. She then summarized the final report from the June 1 tribal consultation.

Next, Sarah Ellgen provided an overview of the prohibited species donation program (PSD program), which is administered by the organization SeaShare. During the June 1 consultation, several tribal representatives requested information about the PSD program and expressed interest in participation in the program by western Alaska communities. The PSD program allows salmon and halibut caught accidentally in the groundfish trawl fisheries to be distributed to hunger relief organizations. Starting in the fall of 2011, participation in the PSD program increased beyond the Bering Sea and Aleutian Islands to include Gulf of Alaska processors and vessels. SeaShare has begun distributing salmon to food banks in the Kodiak area. Sarah offered to provide the appropriate contact information for those interested in learning more about the program. None of the teleconference participants had questions on the PSD program at this time.

Diana Stram and Nicole Smith summarized the status of the Council's review of the analysis evaluating proposed management measures to minimize non-Chinook (chum) salmon bycatch in the Bering Sea pollock fishery. The Council conducted an initial review of the analysis at its June 2011 meeting in Nome. The Council revised and restructured the alternatives and options, and requested that additional information be included in the analysis. The Council is scheduled to review the revised analysis at its meeting in Anchorage in April 2012. The analysis will be available for public review in mid-March and will be posted on the Council's website at <http://www.alaskafisheries.noaa.gov/npfmc/>. Nicole informed the participants that a public, statewide teleconference on the non-Chinook salmon bycatch management measures would be held in the spring of 2012. The Council held this teleconference on February 24, 2012, and a report will be posted on the Council's website.

The participants were then asked to share their concerns and questions. The following issues and responses from NMFS were discussed.

- What is the location of the Council's April meeting?
 - Response: The Council will hold its April meeting at the Hilton Hotel in Anchorage.
- Clarification was requested on a sentence for a Response on page 4 of the June 1 tribal consultation report. The sentence responded to a concern on how bycatch can be controlled and reads as follows: "The Council's program does not set as a goal allowing the pollock fishery to harvest up to the hard cap of Chinook salmon."
 - Response: The Council authorizes and approves the amount of Chinook salmon bycatch that can be caught by the Bering Sea pollock fishery. The pollock fishery will close if that number, the hard cap, is reached. The goal is not for the pollock fishery to reach that number, but for the pollock fishery to minimize its Chinook salmon bycatch and keep the amount of bycatch as low as possible.
- When does the pollock fishery close?
 - Response: The pollock fishery will close when sectors reach their seasonal pollock allocations, when the seasons end on June 10 or November 1, or when the hard cap for Chinook salmon bycatch is reached.
- We would rather catch salmon than acquire it through food banks. Subsistence catch of salmon is shared and contributes to our food supplies. Important knowledge, skills, and values are associated with the way we harvest, preserve, and share salmon.
 - Response: NMFS appreciates the comments that subsistence salmon have considerable significance to individuals, their families, and their communities. The PSD program is not intended to replace locally harvested salmon with commercial bycatch. The purpose of the PSD program is to try to use salmon bycatch, which has already been caught and killed, for human consumption if that salmon has been maintained in the appropriate condition.
- Are the salmon distributed through the PSD program edible?
 - Response: Yes, the same processing and quality guidelines exist for the salmon as the other fish that the fishermen process. The food banks where the salmon are distributed are subject to the State of Alaska's food safety regulations.
- A representative of Savoonga requested more information on receiving donated salmon through the PSD program.
 - Response: After the teleconference, Sarah Ellgen and Sally Bibb called and talked to Ronnie Toolie of Savoonga about the PSD program. The contact information for the representative of SeaShare, which distributes salmon donated to the program, was emailed to Mr. Toolie.
- During the June 1 tribal consultation, tribal representatives commented on research needs and asked questions on the cumulative impact of salmon interception in the False Pass salmon fisheries, the information we get from Russia about chum salmon, and the percent of Alaska fisheries taxes used for research.

- **Response:** The analysis will include escapement and harvest information for the Area M fisheries, which are also known as the False Pass fisheries, and information on the stock of origin of chum salmon caught in Area M. The analysis also will include what is known about chum salmon released from Russian hatcheries and the origin of chum salmon caught in the Bering Sea pollock fishery.

The analysis probably will not include information on fisheries taxes used for research; however, this could change as the analysis progresses. As the action is not expected to reduce landings, there is no expected impact on taxes derived from landed value and, therefore, no specific need to detail the various State of Alaska taxes at this time. Almost all of the state fisheries tax collections are General Fund tax collections and are appropriated, including to fisheries research, during the annual budget process. The collections and how they are shared with municipalities depend on the type of tax in question. Information on the fisheries tax collections is provided in the Alaska Tax Division 2011 Annual Report:

<http://www.tax.alaska.gov//programs/documentviewer/viewer.aspx?2470f>.

The Fisheries Resource Landings Tax, which is a tax on the pollock fishery authorized by the American Fisheries Act and most applicable to the discussion of chum bycatch, and the State Fisheries Business Tax are shared with municipalities. The remainder of these tax collections is retained by the State of Alaska as receipts into the General Fund. A municipality could use its portion of these taxes to fund research; however, it is more likely that it goes into the municipality's General Fund and any amount for fisheries research would be part of an appropriation in the municipal budget process. The State collection goes into the State's General Fund and could be allocated to fisheries research as part of the annual budget process. Additionally, most municipalities that have fish landing ports charge their own landing taxes as well as sales taxes, and large proportions of the annual budget for such locales can come from these taxes. Thus, municipalities receiving these revenues could allocate monies to fisheries research as part of their annual budget process.

- NMFS should review the Alaska Sustainable Salmon Fund, which could fund research in the Norton Sound and Bering Strait region.
 - **Response:** The Alaska Sustainable Salmon Fund (AKSSF) comprises Alaska's allocation of funds from the Pacific Coastal Salmon Recovery Fund (PCSRF). The PCSRF was established by Congress in fiscal year 2000 to protect, restore, and conserve Pacific salmon and steelhead populations and their habitats. Under the PCSRF, NMFS provides funding to states and tribes of the Pacific Coast region to implement habitat restoration and recovery projects that contribute to the sustainability of the species. For more information, see the AKSSF website at http://www.akssf.org/akssf_org/home.cfm# or the NMFS PCSRF website at <http://www.nwr.noaa.gov/Salmon-Recovery-Planning/PCSRF/>.