



Craig Fleener
USA

Co-Chairs

Frank Quinn
Canada

Yukon River Panel 100 – 419 Range Road Whitehorse, Yukon Y1A 3V1

February 15, 2010

Robert D. Mecum, Acting Administrator
National Marine Fisheries Service, Alaska Region
PO Box 21668
Juneau, AK 99802

RE: Salmon Bycatch Ruling

Dear Mr. Mecum:

This letter conveys comments and recommendations of the Yukon River Panel regarding the Bering Sea Chinook Salmon Bycatch proposed ruling.

The Yukon River Panel is an international advisory body established under the Yukon River Salmon Agreement for the conservation, management, restoration, and harvest sharing of Canadian-origin salmon between the United States and Canada. This Agreement constitutes Chapter 8 of the Pacific Salmon Treaty¹, which means it has the full power and force of an international treaty between our two nations.

The Yukon River Panel remains on the record of supporting an interim hard cap of 37,000 Chinook salmon in the bycatch. Given the two options presented by the Council's final action: (Option 1) fish under a hard cap of 47,591; or (Option 2) participate in an incentive program and fish under a 60,000 hard cap, the Yukon River Panel is more supportive of Option 1. Under Option 2, the pollock fishery can catch 60,000 Chinook salmon in two out of every seven years with no consequence. This is unacceptable.

The Panel makes the recommendation to incorporate the more restrictive Option 1 of the Council's final action because the Yukon River Salmon Agreement when signed in 2002 included the provision in the Pacific Salmon Treaty, Chapter 8, paragraph 12: "the Parties shall maintain efforts to increase the in-river run of Yukon River salmon by reducing marine catches and by-catches of Yukon River salmon. They shall further identify, quantify, and undertake efforts to reduce these catches and by-catches." At that time, Chinook salmon bycatch was roughly one-half the 2003-2007 bycatch used in the analysis. Furthermore, approximately 50 percent of Yukon River Chinook salmon are of Canadian-origin, making the international impact of marine bycatch an important element to include as a supplement

¹ <http://www.psc.org/pubs/treaty.pdf> accessed February 2009

to the analysis. In spite of very conservative in-river management actions since 2000, the Canadian escapement objective for Canadian-origin Chinook in 2007 and 2008 was not achieved, and the objective was met in 2009 only as the result of severe restrictions on the fisheries on the Yukon River.

The Yukon River Chinook escapement goal into Canada was met for the first time in three years in 2009 only as a result of severe restrictions to the fisheries throughout the Yukon. There was no commercial fishery in Alaska, the subsistence fishery in Alaska was reduced by 50%, the First Nations of Canada enacted a rigorous conservation program, and the Canadian commercial and domestic fisheries were closed most of the season. The severe harvest restrictions in Alaska led to a Federal fishery disaster declaration by U.S. Commerce Secretary Gary Locke. “Communities in Alaska along the Yukon River depend heavily on Chinook salmon for commercial fishing, jobs and food,” said Commerce Secretary Gary Locke. “I have determined that a fishery disaster has occurred due to consecutive years of low Chinook salmon returns. Alaska fishermen and their families are struggling with a substantial loss in income and revenues.”

We urge the Council to re-consider its options and implement a management plan that is not dependent upon industry incentive plans to reduce the salmon bycatch below the hard cap levels, but instead is based upon agency and Council control.

Sincerely,

Thomas McLain
Interim Executive Secretary