



Coastal Villages Region Fund

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February 16, 2010

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

RE: FINAL Bering Sea Chinook Salmon Bycatch Management EIS/RIR, December 2009

Dear Mr. Mecum,

Coastal Villages Region Fund, represents more than 9,000 residents who live in the communities of Scammon Bay, Chevak, Hooper Bay, Tununak, Newtok, Mekoryuk, Toksook Bay, Nightmute, Chefornak, Kipnuk, Kwigillingok, Kongiganak, Tuntutuliak, Napakiak, Oscarville, Napaskiak, Eek, Quinhagak, Goodnews Bay, and Platinum located on the Bering Sea coast. Residents of our region are first and foremost subsistence harvesters of marine resources from the Bering Sea and also participate and benefit from the Bering Sea/Aleutian Islands Pollock Fishery through the Community Development Quota (CDQ) program.

Coastal Villages Region Fund (CVRF) is providing the following comments on the Final Environmental Impact Statement, Regulatory Impact Review for the Bering Sea Chinook Salmon Bycatch published in December of 2009. While CVRF commends agency staff for their hard work and much improved sections about the impacts to CDQ program, CVRF believes the document still underestimates the potential overall impact to CDQ communities and grossly underestimates forgone Pollock royalties under the alternatives.

Section 2.5, Page 40: *“Therefore, we now rely on royalty information from the CDQ entities publically available annual reports prepared primarily for residents of the member communities. Some of the CDQ entities choose to include specific information about royalties, while others choose not to provide this level of detail in their annual reports. Additional information that*

would improve the analysis of the impacts of the alternative would be to estimate the forgone values of Pollock royalties to the CDQ entities under each alternative.”

- This language suggests the analysis could be improved with additional information and describes an alternative approach, but fails to do so. Given the importance of this issue, and the potential for substantial negative economic impacts to the CVRF region, we believe the analysis should have included accurate “*estimates of the forgone values of Pollock royalties to the CDQ entities under each alternative.*” We believe the royalty estimates in the final EIS are still underestimated, and the information needed to provide a more accurate analysis is available.

Section 2.5, Page 42: “*Most communities in Kotzebue Sound would not be included; however, communities in this area are more dependent on chum salmon and may not be greatly affected by an action to minimize Chinook salmon bycatch in the Bering Sea Pollock fishery (CVRF, 2008).*”

- The reference to CVRF, 2008 appears to be incorrect. The reference to the Pollock provides video that was produced by CVRF staff does include information about impacts to residents in Kotzebue Sound communities.

Section 3.2, Page 51: “*While it appears that sufficient opportunities for subsistence harvests have occurred in most areas in many recent years, reductions in the commercial harvest may greatly affect the subsistence fishery, to the extent some households use commercial catch to meet the costs incurred in the subsistence fishery. Thus, if the commercial Chinook fishery is reduced, it can also reduce opportunities in the subsistence Chinook fishery. Wolfe (2003) provides a more complete discussion of the commercial and subsistence relationships.*”

- It should be noted that income earned through CDQ activities also supports subsistence activities, and if that income is reduced it could also reduce opportunities in the subsistence fishery. If CVRF were unable to operate the near-shore salmon and halibut commercial fisheries, the income of the region residents would be reduced. For instance,

CVRF has provided over \$75 million over the past five years in new infrastructure and operational subsidies in order to provide a commercial salmon market in our region to over 500 fishermen, over 500 crew members, and over 400 plant workers each year. The significant majority of this was paid for with CVRF earnings in the Pollock fishery - and the continued operation of the new salmon infrastructure is expected to be underwritten by our Pollock earnings into the future (about \$3 million in direct operations in 2010 alone, for instance).

Sincerely,

Neil Rodriguez

Regulatory Affairs Manager