Tanana Chiefs Conference

Advocating for Change: Understanding the Chum EIS

Hosted by the Tanana Chiefs Conference

With guest panelists from:
Native Peoples Action
Kuskokwim River Inter-Tribal Fish Commission
Kawerak, Inc.

January 3, 2025 | 6-7PM

NATIVE PEOPLES ACTION

KUSKOKWIM RIVER

KAWERAK, INC.

Traditional Ways of Life & Stewardship of the Land & Waters

Alaska Native **hunting and fishing practices**, including the harvesting, sharing of fish and game, and the accompanying ceremonies, are vital to the **social, cultural, spiritual, physical, and economic well-being and survival** of Alaska Native communities.

"Village on the Lower Yukon, during the fishing season" from Alaska and its Resources (1870) by William H. Dall.

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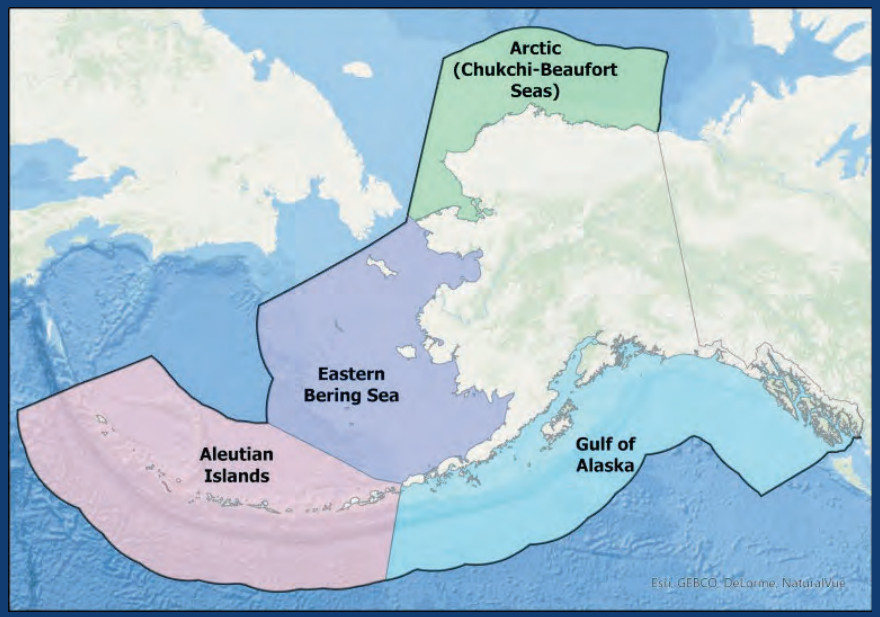
What is the North Pacific Fishery Management Council (NPFMC)?



The NPFMC (or "the Council") crafts management measures for the federal fishery in the North Pacific (between 3 and 200 miles offshore of Alaska). Its actions are reviewed, and if approved, implemented by the **Department of Commerce and within that the National Marine Fisheries Service (NMFS)**.

The NPFMC is one of eight regional Councils established by the **Magnuson-Stevens Fishery Conservation and Management Act (MSA) in 1976.**

The Council is enabled by the MSA to make recommendations that:

1. Set harvest quotas
2. Set prohibited species catch limits
3. Set gear/season/area restrictions
4. Design ecosystem and habitat protections
5. Develop community protections
6. Construct monitoring programs
7. Create limited entry access privileges

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Who is on the North Pacific Fishery Management Council?

NORTH PACIFIC
FISHERY MANAGEMENT COUNCIL

There are 15 seats on the NPFMC

11 voting seats:

- 7 fishery reps: 5 from AK + 2 from WA
- 4 state/federal reps: AK, WA, OR, NMFS

4 non-voting seats:

- Pacific States Marine Commission
- US Fish and Wildlife Service
- US Department of State
- US Coast Guard

Currently, there are <u>no</u> designated Alaska Native Tribal seats.

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What are the Advisory Panel & the Scientific and Statistical Committee?

NORTH PACIFIC
FISHERY MANAGEMENT COUNCIL

(Advisory Panel)

The Advisory Panel (AP) & the Scientific and Statistical Committee (SSC) are the two main advisory bodies to the NPFMC.

The AP is made up of members that represent a number of major fisheries interests. The body is responsible for making recommendations to the Council.

Eva Dawn Burk of Nenana holds the sole designated Tribal seat on the AP.

The SSC is responsible for providing recommendations to the Council on scientific matters. The Committee is composed of scientists in biology, economics, statistics, and social science.

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What is going on with chum salmon bycatch at the NPFMC?

Significant chum salmon declines have been noted in Western and Interior Alaska.

- **Traditional Knowledge holders** in Norton Sound have seen problems with chum for decades.
- In recent years there have been **widespread stock crashes** across the Yukon, Kuskokwim, and Norton Sound regions.
- Declines have huge **impacts on Tribes' ways of life**.

Chum salmon face multiple significant pressures, including:

- **Area M** intercept.
- Ecosystem pressures, including **climate change**, large-scale **hatchery releases**, and **disease**.
- **Bycatch** in the offshore federal pollock fishery, for which there is currently no cap.

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Chum Salmon Bycatch

Chum salmon, including from Western/Interior AK, are **caught and discarded as bycatch** in Bering Sea groundfish fisheries, **especially the pollock trawl fishery.**

These are referred to as **WAK chum salmon**, from genetic stocks between Kotzebue & Bristol Bay + Upper Yukon fall/summer chum stocks.

CURRENT MANAGEMENT

There are **no caps on chum salmon bycatch**.

Pollock industry's **Incentive Plan Agreements (IPAs)** have led chum salmon avoidance management since 2016.

BY THE NUMBERS

- **~99% of chum bycatch taken by pollock trawlers**
- ~20% of all chum bycatch are from WAK region on average
- Primarily caught June–August

POLLOCK TRAWL CHUM BYCATCH

- 2005 = 710,800 chum (1991–present all-time high bycatch)
- 2021 = 546,000 chum (50,800 WAK chum)
- 2022 = 242,400 chum (54,100 WAK chum)
- 2023 = 112,300 chum (11,800 WAK chum)

As of December 19, 2024 = 35,100 chum

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What is an EIS?

An Environmental Impact Statement (EIS), required by the National Environmental Policy Act (NEPA), assesses the environmental, social, and economic impacts of proposed projects likely to significantly affect the environment and explores alternatives to reduce harm.

What is NEPA?

The National Environmental Policy Act (NEPA), enacted in 1969, requires federal agencies to assess environmental impacts before making decisions, ensuring environmental considerations are integrated with economic and technical factors.

How do they relate?

NEPA and an Environmental Impact Statement (EIS) are closely related because the EIS is a critical tool for fulfilling NEPA's requirements. NEPA mandates federal agencies to assess the environmental impacts of their proposed actions, and when a project is likely to significantly affect the environment, an EIS is required.

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Understanding the Basics

The **Environmental Impact Statement (EIS)** is a critical tool used to evaluate how proposed actions might affect the environment, wildlife, and communities, including their economies and social wellness.

In the case of chum salmon, the EIS plays an essential role in addressing the rapid decline of this vital species and ensuring sustainable solutions are put in place while also continuing the pollock fishery.

The EIS starts with a Purpose & Need Statement.

Purpose & Need

To **minimize bycatch of chum salmon in the Bering Sea pollock fishery** to the extent practicable while **balancing the National Standards** and maintaining objectives of prior bycatch management measures.

This action addresses declines in chum salmon across Western and Interior Alaska, which have critical implications for subsistence, cultural practices, and sustainability, and **aims to minimize the bycatch of specifically WAK chum salmon.**

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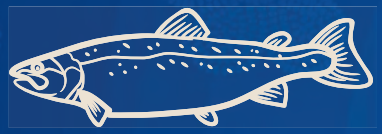
EIS Process & Timeline



NEPA recommends completing the entire EIS process within 2 years

Average duration of an EIS is 1-3 Years

START HERE

Notice of Intent

Scoping (30-60 days)

Draft EIS Preparation (several months to years)

YOU ARE HERE

(Preliminary) Draft EIS publication & public comment period

Final EIS preparation (several months)

Final EIS publication

Record of Decision (cannot be issued sooner than 30 days after the final EIS is published)

Action implemented

END HERE

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CHUM SALMON BYCATCH ALTERNATIVES

ALT 1: NO ACTION/STATUS QUO

ALT 2*: OVERALL PROHIBITED SPECIES CATCH (PSC) LIMIT, OR CAP

Based on historical bycatch levels.

Cap range between 100K–550K.

In place every year.

ALT 3*: OVERALL PSC LIMIT BASED ON IN-RIVER CHUM ABUNDANCE

Yukon summer/fall + Kuskokwim + Norton Sound
OR Yukon summer/fall abundance to determine threshold.

No cap at high abundance.

ALT 4: REGULATORY CHANGES TO INDUSTRY'S IPAS

Aligns regulations with current practices – about the same as status quo.

Includes using salmon excluders and reporting bycatch numbers more transparently.

ALT 5: IN-SEASON CORRIDOR CAP, OR TIME-AREA CLOSURES

Time/area closures in areas of high WAK chum migration.

In effect June 10-Aug. 31 each year.

If cap of 50K–200K met, area closed to trawling until Sept. 1.

**2 AND 3 ARE MUTUALLY EXCLUSIVE. 4 AND/OR 5 MAY BE MATCHED WITH 2 OR 3.*

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Chum Bycatch EIS Timeline

2021-2023

High levels of chum bycatch and extremely low abundance levels of chum in rivers in chum salmon bycatch pressure attention for chum bycatch

DEC. 2021

Tribal petition for emergency action to reduce salmon bycatch submitted; denied Jan. 2022.

JULY 2023

Notice of Intent (NOI) published to begin NEPA process for chum salmon bycatch action.

OCT. 2023

Council sets **4 alternatives** for first draft Environmental Impact Statement (EIS) and Social Impact Assessment (SIA).

NOV. 2023

KRITFC a becomes cooperating agency.

NOV. 2023–MAR. 2024

Development of draft EIS/SIA.

JAN. 2024

Tribal petition for emergency action to reduce salmon bycatch submitted; denied Apr. 2024.

APR. 2024

Council reviews draft EIS/SIA, hears from over 100 testifiers, and **revises alternatives – now 5** – for preliminary draft EIS.

MAY 2024

TCC becomes a cooperating agency.

JUNE–DEC. 2024

Development of preliminary draft EIS.

FEB. 2025

YOU ARE HERE

Council to review preliminary draft EIS, receive testimony, and advice next steps for NMFS.

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How Can the EIS Help the Chum Salmon?

The EIS considers the **social and economic effects** of bycatch on subsistence users, potentially leading to policies that prioritize WAK salmon conservation.

By analyzing cumulative impacts, the EIS can **highlight the importance of chum salmon to regional ecosystems** and inform balanced management decisions.

Reducing bycatch through EIS-informed measures **could alleviate one human-caused stressor on salmon**, giving salmon populations a better chance to adapt to environmental changes.

The EIS **evaluates trade-offs between reducing bycatch and maintaining pollock fishery operations**, aiming to minimize adverse impacts on local economies. **Striking a balance between protecting salmon stocks and sustaining the Bering Sea pollock industry poses a challenge**. The pollock fishery is a significant economic driver and provides food security globally.

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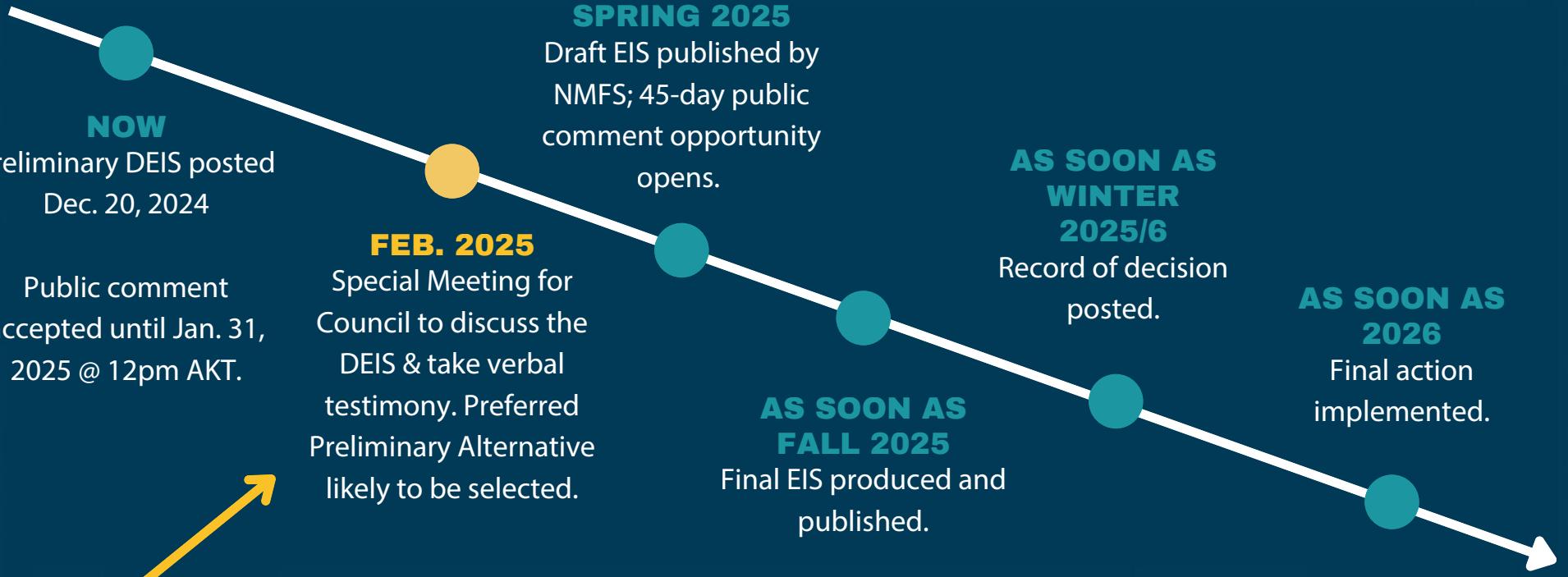
Next Steps: Chum Bycatch EIS Process



NOW
Preliminary DEIS posted Dec. 20, 2024

Public comment accepted until Jan. 31, 2025 @ 12pm AKT.

Where we are now

FEB. 2025
Special Meeting for Council to discuss the DEIS & take verbal testimony. Preferred Preliminary Alternative likely to be selected.

AS SOON AS SPRING 2025
Draft EIS published by NMFS; 45-day public comment opportunity opens.

AS SOON AS FALL 2025
Final EIS produced and published.

Final decision advised by NPFMC.

AS SOON AS WINTER 2025/6
Record of decision posted.

AS SOON AS 2026
Final action implemented.

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NATIVE MIND ACTION

How Can You Make a Difference?

WAYS TO PARTICIPATE

- Participate in **Tribal engagements & Consultations**
- **Submit a letter or online comment** to the NPFMC
- **Provide information to TCC to communicate on your behalf**
- Provide **testimony** to the NPFMC
- If you cannot attend in person, **attend via Zoom or watch via the livestream** on Youtube (@NPFMC)
- **Talk to people in your community** directly about how they can engage

REMINDERS & TALKING POINTS

- **Every Salmon Counts!** Protect our ways of life!
- Speak to the **different ways chum salmon are important** to your way of life, your family, your community
- **Your Traditional Knowledge is powerful!**
- Managers need to recognize **we are in a disaster** for Tribes and salmon and that is how they have to manage the fisheries
- **Everyone needs to share the burden of conservation**, not just Tribes.
- We need **caps and closures that will ensure reduction in chum salmon bycatch** way below its average historical level

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This training was possible through collaboration between:

Scan the code to go to the landing page for the Feb. 2025 NPFMC meeting!

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