

Seward Peninsula Subsistence Regional Advisory Council
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Jonathan M. Kurland, Regional
Administrator
Alaska Region, National Oceanic and Atmospheric Administration
P.O. Box 21668
Juneau, Alaska 99802-1668

Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
L92 Building, 4th floor
Anchorage, Alaska 99501

Dear Mr. Kurland and Chair Drobnica,

I write to you on behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council) to share comments on the alternatives being considered in the Bering Sea Chum Salmon Bycatch Management Draft Environmental Impact Statement (DEIS).

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Seward Peninsula Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting in Nome on January 20 - 22, 2026, where the Bering Sea Chum Salmon Bycatch Management alternatives under consideration for the Bering Sea pollock fishery were discussed as part of our Council's business. The Council voted to support the following alternatives, and recommend the North Pacific Fishery Management Council (NPFMC) to implement these alternatives jointly:

- **Alternative 2, Overall Chum Salmon Prohibited Species Cap (PSC) Limit**

The Council strongly supports an overall cap on Chum Salmon bycatch of 100,000 fish. Given the decline in Western Alaska Chum Salmon stocks, the Council believes that establishing a fishery-wide hard cap, at the lowest possible level, is a necessary measure to protect Chum Salmon populations in Western Alaska. The Council is not in support of other alternatives being considered that establish a PSC limit based on abundance.

- **Alternative 5, In-season Corridor Closures**

Additionally, the Council believes that timing and area closures are also necessary to protect Western Alaska Chum Salmon migrating to their spawning grounds. Therefore, the Council supports the implementation of an in-season corridor with a cap that accrues towards the fishery-wide hard cap of 100,000 Chum Salmon, as selected in Alternative 2 above.

- **Alternative 4, Modifications to Regulations Impending the Salmon Bycatch Incentive Plan Agreements (IPAs)**

The Council supports incorporating IPA provisions into 50 CFR 679.21(f)(12)(iii)(E) regulations.

The Council emphasizes the critical importance of incorporating Traditional Knowledge (TK) into NPFMC's management decisions. TK provides valuable insights that support sustainable and culturally respectful fisheries management. The Council is concerned that TK was not adequately considered when establishing the PSC limits outlined in this DEIS. To ensure informed and equitable decision-making, NPFMC must deepen its understanding of the cultural values and traditional knowledge of Alaska Native Peoples. The Council strongly urges NPFMC to integrate TK into all future management actions that affect salmon populations.

Thank you for considering our comments on the Chum Salmon bycatch alternatives. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Gisela Chapa, at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,



Louis Green Jr.
Chair

cc: Federal Subsistence Board
Seward Peninsula Alaska Subsistence Regional Advisory Council Members
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record