

**Bristol Bay Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 787-3888, Fax: (907) 786-3898  
Toll Free: 1-800-478-1456

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North Pacific Fishery Management Council  
1007 W. 3rd Avenue, Suite 400  
Anchorage, Alaska 99501

Dear Chair and Council Members,

On behalf of the Bristol Bay Subsistence Regional Advisory Council (Council), thank you for the opportunity to comment on the Bering Sea Chum Salmon Bycatch Management Environmental Impact Statement (EIS) and the range of alternatives under consideration for the Bering Sea pollock fishery. The Council also extends its sincere appreciation to the North Pacific Fishery Management Council members and staff who attended our January meeting in person to present information and hear the Council's concerns directly. That face-to-face engagement was meaningful to Council members and underscored the importance of this issue to the communities we represent.

The Council represents subsistence users of fish and wildlife resources on Federal public lands and waters within the Bristol Bay Region. Established under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act, the Council has authority under Section 805 of ANILCA to initiate, review, and evaluate regulations, policies, and management actions affecting subsistence uses. This includes reviewing actions occurring outside the region when they may impact subsistence resources critical to the communities the Council serves.

The Council met publicly on January 12, 2026, in Anchorage to discuss the Bering Sea Chum Salmon Bycatch Management EIS and associated alternatives. Based on that discussion, the Council offers the following comments.

The Council remains deeply concerned about the continued impacts of Chum Salmon bycatch on Western Alaska communities, particularly those in the Arctic-Yukon-Kuskokwim (AYK) region. Council members emphasized that Chum Salmon are a critical subsistence resource for families and communities, and that ongoing declines have resulted in severe restrictions and, in some cases, complete closures of subsistence fishing opportunities. These losses are not theoretical; they directly affect food security, cultural continuity, and community well-being. From the Council's perspective, these impacts must be given substantial weight when evaluating bycatch management alternatives.

The Council also raised concerns regarding monitoring and enforcement in the Bering Sea pollock fishery. Members questioned whether current observer coverage and electronic monitoring systems are sufficient to ensure accurate accounting of Chum Salmon bycatch and effective compliance with regulations. The Council is concerned that continued reliance on industry self-monitoring and incentive-based measures alone does not provide adequate assurance that Chum Salmon bycatch will be reduced to levels necessary to protect subsistence resources.

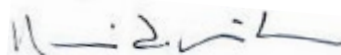
In addition, Council members expressed concern about the broader environmental impacts associated with trawl fisheries. These concerns include potential damage to the ocean floor and displacement of marine mammals such as walrus and seals, as well as impacts to other subsistence resources including halibut, other salmon species, and shellfish. All of these species are important to the food security, culture, and economies of Western Alaska communities. The Council believes these cumulative environmental effects should be fully considered alongside salmon bycatch impacts.

Given the severity of the situation facing Western Alaska Chum Salmon stocks, the Council expressed a clear preference for stronger, proactive bycatch reduction measures. Several members voiced support for lower bycatch caps and measures that require immediate action when bycatch thresholds are approached, rather than measures that react only after impacts have already occurred.

In particular, the Council supports Alternative 5, which would establish an in-season corridor closure triggered by a Chum Salmon cap. The Council believes this alternative offers a more direct and effective approach to reducing bycatch of Western Alaska Chum Salmon because it restricts pollock fishing in areas and times that AYK-origin Chum Salmon are most vulnerable. Council members emphasized that proactive, enforceable measures, such as in-season corridor closures, are preferable to approaches that depend primarily on voluntary compliance or post-season accountability.

The Bristol Bay Subsistence Regional Advisory Council urges the North Pacific Fishery Management Council to prioritize the protection of Western Alaska Chum Salmon stocks and the subsistence users who depend on them when selecting a preferred alternative. The Council appreciates your consideration of these comments and looks forward to continued engagement on this issue. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Leigh Honig at (907) 891-9053 or, [leigh\\_honig@ios.doi.gov](mailto:leigh_honig@ios.doi.gov).

Sincerely,



Nanci Morris Lyon  
Chair

cc: Federal Subsistence Board  
Interagency Staff Committee  
Bristol Bay Subsistence Regional Advisory Council  
Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Federal Subsistence Liaison, Division of Wildlife Conservation, Alaska  
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