

**Western Interior Alaska and Eastern Interior Alaska
Subsistence Regional Advisory Councils**
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To
OSM.B25059

December 31 2025

Jonathan M. Kurland, Regional Administrator
Alaska Region, National Oceanic and Atmospheric Administration
P.O. Box 21668
Juneau, AK 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:

We write to you on behalf of the Western Interior Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to share feedback on the alternatives being considered in the Bering Sea Chum Salmon Bycatch Management Draft Environmental Impact Statement.

The Councils represent subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Interior Alaska. They were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charters establishes the Councils' 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 Councils also review resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Councils. The Councils provide public forums for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within their regions.

The Councils held a joint public meeting October 17, 2025, in Fairbanks. Among the items discussed were the Bering Sea Chum Salmon Bycatch Management alternatives. The Councils voted to support the following alternatives:

- **Alternative 5, Option 1: In-season corridor cap** – The Councils strongly support the implementation of a “conservation corridor” to decrease the bycatch of Western Alaska salmon and allow for their uninterrupted migration to their natal streams. Although the Councils would like to see permanent in-season migratory corridors established, that is

not an option being considered. The strictest option is necessary given the record low returns of Chum Salmon to the Yukon River that have resulted in complete closure to subsistence fall Chum Salmon fishing and the inability to meet spawning escapement goals. Therefore, the in-season corridor should be implemented if a cap of 50,000-100,000 Chum Salmon is harvested, and the entirety of Clusters 1 and 2 must be closed at that time.

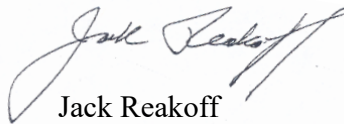
- **Alternative 2: Overall Bycatch Prohibited Species Catch (PSC) Limit for Chum Salmon** – The Councils strongly support an overall cap on Chum Salmon bycatch with a limit of 50,000-100,000 fish. The cap should be significantly less than historical bycatch amounts with the goal of increasing the return of Chum Salmon to their natal streams. The PSC limit should remain in place regardless of Western Alaska (WAK) salmon abundance indices or thresholds because conservation must be the highest priority to protect these stocks.
- **Alternative 4: Additional regulatory requirements for Incentive Plan Agreements (IPAs)** – The Councils fully support the listed requirements being mandatory rather than voluntary to encourage reductions in bycatch of Chum Salmon into the future. However, this alternative is not enough to protect Chum Salmon as it is more in line with the status quo.

Overall, the Councils believe that implementation of multiple alternatives is required for adequate protection of Chum Salmon. The combination must include setting a PSC limit, establishing a conservation corridor, and increasing regulatory requirements for IPAs. These measures are long overdue and represent steps in the right direction for commercial fishers to begin sharing the burden of conservation that has long been shouldered by in-river subsistence users.


Further, the Councils do not support either **Alternative 1: Status Quo** because the status quo has failed to adequately minimize Chum Salmon bycatch and protect WAK stocks, or **Alternative 3: Chum Salmon PSC Limit with WAK Chum Threshold** because conservation measures should be permanently in place regardless of abundance indices.

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 us through our respective Subsistence Council Coordinators: Brooke McDavid (Eastern Interior), at (907) 891-9181 or brooke_mcdavid@ios.doi.gov or Nissa Pilcher (Western Interior), at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair, Western Interior



Robert "Charlie" Wright, Sr.
Chair, Eastern Interior

cc: Federal Subsistence Board

Western Interior Alaska Subsistence Regional Advisory Council

Eastern Interior Alaska Subsistence Regional Advisory Council

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

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