

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

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In Reply Refer To
OSM.R26006

JANUARY 29 2026

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

Dear Chair Drobnica:

We write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to share our 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 Yukon-Kuskokwim Delta region. The Council 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 held a public meeting January 20-22, 2026, in Bethel. Among the items discussed were the Bering Sea Chum Salmon Bycatch Management alternatives. The Council voted to submit the following comments:

- The Council does not feel that the alternatives presented in the DEIS do enough to prioritize subsistence fishing over commercial fishing, or to protect the Western Alaska (WAK) salmon stocks. Commercial fisheries should never continue to operate when subsistence fisheries are closed for conservation reasons. People who live along Alaskan rivers are forced to sacrifice their traditional foods, but commercial fishing continues to profit off the resource. This is not fair. Regardless, it is a step in the right direction to implement restrictions on the pollock fleet to reduce Chum Salmon bycatch.
- The Council supports **Alternative 5, Option 1: In-season corridor cap** as the highest priority alternative. This alternative provides the greatest amount of protection for WAK stocks in the statistical areas where they are found most concentrated. Although the

Council would like to see a permanent in-season migratory corridor established, that is not an option being considered. Therefore, the Council recommends implementing the in-season corridor at the lowest considered prohibited species catch (PSC) limit of 50,000 Chum Salmon. The strictest option being considered 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, restrictions or closures to summer Chum Salmon fishing, and the inability to meet spawning escapement goals for both fall and summer Chum Salmon.

- The Council supports **Alternative 2: Overall Bycatch PSC Limit for Chum Salmon** to be implemented in addition to Alternative 5, Option 1. The Council feels that the range of limits being considered are too high and would prefer to see a cap set at 50,000 Chum Salmon. However, since that is not one of the options being considered, the Council supports the PSC limit of 100,000 Chum Salmon. This cap should remain in place every year regardless of WAK salmon abundance metrics in order to proactively keep bycatch numbers as low as possible and proactively implement conservation measures for this important subsistence species. For these reasons, we oppose **Alternative 3**.
- The Council supports **Alternative 4: Additional regulatory requirements for Incentive Plan Agreements (IPAs)** to be implemented in conjunction with the above alternatives. The Council supports 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 on its own as it is more in line with the status quo.

Overall, the Council feels that the combination of the above alternatives is the best way to adequately reduce bycatch and protect WAK Chum Salmon. The combination must include setting a low PSC limit/bycatch cap, establishing a conservation corridor, and increasing regulatory requirements for IPAs. We share the sentiments of the other Yukon River Subsistence Regional Advisory Councils that 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 subsistence users.

Additionally, although it is outside the scope of this DEIS, our Council continues to advocate for at least two subsistence user and/or Tribal designated seats on the North Pacific Fishery Management Council.

Thank you for considering our comments on the Chum Salmon bycatch alternatives. If you have any questions or would like to engage our Council, please contact us through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Jacqueline Cleveland,
Chair

cc: Federal Subsistence Board
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