



Federal Subsistence Board

Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 – 6199



In Reply Refer To:
F26026

AUG 12 2026

Richard Greg Encelewski, Chair
Southcentral Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Encelewski:

This letter responds to the Southcentral Alaska Subsistence Regional Advisory Council's (Council) Fiscal Year 2026 Annual Report. The Secretaries of the Interior and Agriculture have delegated to the Federal Subsistence Board (Board) the responsibility to consider these reports. The Board appreciates your effort in developing the Annual Report. Annual Reports allow the Board to become aware of issues outside of the regulatory process that affect subsistence users in your region. We value this opportunity to review the issues concerning your region.

1. Fund Wildlife Resource Monitoring Program

"The Fisheries Resource Monitoring Program (FRMP) has been of great benefit to subsistence users and resources. It is unclear to the Council why a Wildlife Resource Monitoring Program (WRMP) was not created when the FRMP was established decades ago. The Council again requests that WRMP be established. Numerous biological needs and data gaps across the state would benefit greatly from such a program. The Council has heard concerns from this and other regions regarding declining availability of subsistence resources, while pressure on these resources is increasing from all user groups.

Recommendation:

The Council recommends addressing the biological data gap by creating a WRMP. Because the FRMP already provides a basic framework, only minimal modifications would be needed to support terrestrial research projects. The only missing component is funding."

Response:

The Board agrees that a WRMP would provide essential information to address many of the biological data gaps affecting subsistence wildlife resources across Alaska. The Board also recognizes the Council's concern that, unlike the Fisheries Resource Monitoring Program established decades ago, a comparable program for wildlife has never been developed.

Section 812 of Title VIII of the Alaska National Interest Lands Conservation Act, codified at 16 U.S.C. § 3122, says that the Secretary shall, among other things, undertake research on fish and wildlife and subsistence uses on the public lands. This statutory mandate underscores the importance of a structured and responsive research program, and of the creation of a WRMP could assist the Federal Subsistence Management Program in meeting this obligation for terrestrial resources. The individual land managing agencies undertake a great deal of biological research related to wildlife management; however, WRMP would fill data gaps that remain.

The Board agrees that the framework provided by the existing Fisheries Resource Monitoring Program offers a strong foundation from which a WRMP could be developed with only modest modifications to support terrestrial research. However, the lack of dedicated funding and staffing remains the primary impediment. As the Council noted, the need is clear; what is missing is the financial capacity to implement the program. Current shrinking budgets across the Departments of the Interior and Agriculture present significant challenges to initiating new programmatic commitments, including a WRMP.

While the Board does not have authority over the development of the annual appropriations for the Office of Subsistence Management, the Council can convey its concerns to the Secretaries of the Interior and Agriculture through a formal letter transmitted via the Board. During the Summer Work Session, the Council Chairs in attendance expressed the desire to write a joint-Council letter to the Secretaries to emphasize the need for adequate and consistent funding for the FRMP and for the creation of a WRMP. A draft letter will be prepared for Council review and potential action at your fall 2026 meeting.

The Board remains committed to supporting the Council's priorities to the fullest extent of its authority and the research and information necessary to maintain meaningful subsistence opportunities for rural Alaska residents.

2. Use of Council Time and Lack of Compensation

"Council members currently volunteer their time to serve their region on the Subsistence Regional Advisory Councils (Councils). All Councils have drafted correspondence on the lack of compensation to multiple Administrations. The lack of compensation is a limiting factor in recruiting and retaining new members. Currently, Council members must take time off from their jobs and schools, spend time away from their communities, families, and potentially important subsistence activities to share their valued knowledge with the Federal Government at Council meetings. Not everyone is in a position to take time off work, especially without financial compensation.

During the fall 2025 meeting cycle, Council members were asked to supply recommendations on 24 regional, statewide, and crossover wildlife proposals, as well as to draft this Annual Report to this Board to whom the Secretaries of the Interior and Agriculture delegated this authority, among other typical Council business. Council members also received reports from relevant government and non-government agencies. In addition to this heavy workload, the Council was also asked to supply comments to an ongoing Secretarial Review of the Federal Subsistence Management Program (Program). This was a heavy lift on a complex topic, and a large

workload for volunteers. The results of these agenda items are of high importance to subsistence users of the region, but the workload was heavy and the hours long.

Council members would also like to request that planning for a future All Council Meeting be undertaken. The All-Council meetings strengthen relationships, foster collaboration, and benefit the Councils, the Program, and the resources. Due to growing concerns about resource shortages, the Council wishes to emphasize the need for dialogue between neighboring Councils.

Recommendation:

The Council would like to remind both the Office of Subsistence Management (OSM) and the Board to be mindful of what is asked of the volunteers that comprise the Councils. The Council understands that there are deadlines and timeframes in which business must be conducted, but there is only so much that volunteers can work through. In future situations, the Council suggests utilizing work sessions or other avenues to assist in reducing the workload of the Council at the biannual Council meetings. Additionally, the Council would like to request that planning for another All-Council Meeting is undertaken. The Council understands that preparing for an All-Council meeting takes time to secure funding and to plan the meeting and would like to request that OSM begin this process now.”

Response:

The Board deeply appreciates the knowledge and volunteer service that Council members contribute to the Program and fully recognizes the personal sacrifices involved including lost wages, leave time, time away from family and community, and missed subsistence opportunities. The Board understands these hardships and acknowledges that the workload placed on volunteer members during the fall 2025 meeting cycle was substantial. As the Council notes, reviewing 24 wildlife proposals, drafting the Annual Report, receiving multiple agency updates, and providing comments to the ongoing Secretarial Review represented a significant commitment of time and expertise. The Board also remains committed to supporting the Councils and will continue to be mindful of the workload placed on volunteer members.

Regarding compensation, the Board notes that under the Federal Advisory Committee Act (41 CFR 1023.130(b)), agencies are not required to pay advisory committee members, though agency heads may establish appropriate rates of pay. In March 2026, the Board forwarded your Council’s request, along with similar requests from other Regional Advisory Councils, accompanied by a Board letter to the Office of the Secretary of the Interior. The Secretary is now reviewing this request, and the Board will let your and other Councils know if any decision is made.

The Board also acknowledges the success of the 2016 and 2024 All Council meetings and recognizes the value they bring in strengthening relationships, fostering collaboration, and supporting dialogue between neighboring Councils. However, given the ongoing Secretarial Review of the Federal Subsistence Management Program (Program), the Board recommends waiting until the review is complete before initiating planning for another All Council meeting. Organizing such a meeting is a complex and costly undertaking and the Program’s budget was reduced by \$2 million in FY 2026. Organizing future All Council meetings depends on available

funding and staffing, and the Board hopes that another All Council meeting will be possible in the future.

3. Commercial Trawling Operations Detrimental to Subsistence

“Council members are both experiencing and hearing from the region that marine resources are being increasingly difficult to find and harvest, and that salmon returns are becoming even weaker with few exceptions. The Council has heard of the horrific situation that those that reside on the Yukon and Kuskokwim are facing. One ongoing practice that the Council believes is partially responsible is the commercial trawling fleet, operating in Alaska’s marine waters. The Councils concern lies in both the targeted and incidental biomass removal from the marine environment, as well as physical damage to ecosystem as trawling nets are dragged across the sea floor, both of which are highly detrimental to the marine food webs and the ability for subsistence users to meet their needs.

Recommendation:

The Council has not previously become as involved with the North Pacific Fisheries Management Council as other regions but will now initiate action to better understand that Councils’ processes. The Council wishes for action to be taken by the Board and OSM to relay our Councils concerns to this regulatory body when possible, in the meantime.”

Response:

The Board appreciates the Council’s continued attention to the status of marine resources and the challenges rural Alaskans are experiencing in meeting their subsistence needs. The Board recognizes the Council’s concerns about declining salmon returns and closures, reduced harvest opportunities, and the effects that commercial trawl fisheries may have on marine ecosystems and subsistence resources.

On August 3, OSM hosted a much-requested workshop with Council Chairs regarding the Alaska salmon crisis prior to the Board’s 2026 summer work session that took place August 4-5. During this workshop, the Chairs had the opportunity to hear a presentation from the Solicitor’s office and exchange information on salmon issues. During the Work Session, the Board committed to requesting an annual meeting with the Secretaries to discuss important subsistence issues such as those that fall outside of the Board’s jurisdiction. The Board plans to ask that the inaugural meeting focus on the Alaska salmon crisis and include Council Chairs. Until we have further guidance, we continue to encourage the Councils to engage directly with other regulatory bodies such as Alaska Board of Fisheries and the North Pacific Fishery Management Council.

Many marine resources, important to subsistence users, spend portions of their life cycle in State and federal marine waters and that the health of these ecosystems is important to the long-term sustainability of subsistence fisheries. The Board understands that concerns have been raised regarding bycatch, habitat impacts, and the cumulative effects of commercial fishing activities on marine food webs. At the same time, the Board acknowledges that management of commercial fisheries in marine waters falls primarily under the authorities of the State of Alaska and the National Marine Fisheries Service through the North Pacific Fishery Management Council (NPFMC) process.

Although the Board does not have management authority over Federal marine fisheries, National Oceanic and Atmospheric Administration (NOAA) Fisheries and the NPFMC have several responsibilities that support consideration of subsistence concerns in fisheries management. Under National Standard 8 & 9 (bycatch) found at 16 U.S.C. § 1851(a)(8)(9) of the Magnuson-Stevens Fishery Conservation and Management Act, fishery managers are directed to consider the importance of fishery resources to fishing communities and, where practicable, minimize adverse impacts on those communities. In addition, NOAA Fisheries is required to conduct government-to-government consultation with Tribes and evaluate the effects of management actions on Alaska Native communities and traditional resource uses through Tribal consultation, National Environmental Policy Act analyses, and other applicable policy frameworks. These requirements provide important mechanisms for considering how commercial fishing activities, including trawl fisheries and associated bycatch, may affect the availability of resources relied upon by subsistence users and rural communities throughout Alaska. The Board supports the Council's interest in remaining engaged in discussions regarding marine resource management and encourages participation in NPFMC processes. Several Councils have invited NPFMC to provide updates during their meetings. Additionally, NPFMC recently held engagement sessions with several Councils prior to their action on Chum Salmon bycatch (see Enclosure 1). Please let your Council Coordinator know if you would like them to coordinate with the NPFMC to provide an overview of their process at a future meeting.

The Board values the observations and traditional knowledge provided by subsistence users and recognizes the important role Regional Advisory Councils play in elevating local concerns regarding resource conditions and harvest opportunities. The Board applauds the participation of Council members at NPFMC meetings and the sharing of this information with fellow Council members.

The Board remains committed to ensuring that the concerns of subsistence users are communicated to relevant management agencies and decision-makers. The Board appreciates the Council's recommendation and encourages continued dialogue, information sharing, and collaboration among Federal agencies, the State of Alaska, the NPFMC, Tribes, and subsistence users to improve understanding of factors affecting marine resources and to support the long-term sustainability of subsistence harvest opportunities.

4. Adequate Signage

"The Council would like to ensure that adequate signage exists in areas of the Region where the resources are heavily used and where vehicle or other such restrictions or limitations apply. Some areas of the state are becoming increasingly heavily used. Technological advances are making all-terrain vehicles better equipped for more extensive off-road travel and their operators feel more confident in their equipment and are venturing further off the road. Combined with increased utilization of existing trail systems, especially in Unit 13, this has led to accelerated trail degradation. These machines operate on sensitive ecosystems that are becoming increasingly scarred with crisscrossing trails and blown-out mud pits where a simple puddle or water seep once existed.

Recommendation:

The Council urges the federal agency landowners to ensure any previous educational or boundary signage is still in place. Additionally, the Council requests an inventory to identify where new signage would be beneficial. If it is established that there are areas that would benefit from new or additional signage, the Council requests that the federal agency landowners ensure that this is done. At a time when staffing and funding are at an all-time low, it is important that the information on landownership and restrictions on that land is made as publicly available as possible.”

Response:

Thank you for bringing up this important topic. The Board agencies see the importance and relevance of clear and up to date signage. Agencies would appreciate input from the Council on where more signs would be helpful across the Southcentral region. This will help them address signage needs more directly with the Council and the specific land management agency. For future reference, these types of requests are better addressed by reaching out directly to the agencies involved, either via correspondence and/or invitation to discuss at a future Council meeting.

The Board wants to thank the Council for sharing information in your FY-2025 Annual Report on other issues significant to the Council: concerns over paralytic shellfish poisoning, invasive species, and the short- and long-term effects of ocean acidification effects on shellfish, salmon, and other marine resources, and impacts on subsistence users; necessity of ensuring flexibility in future regulatory decisions and changes, especially regarding special action requests; and concerns how inadequate staffing affects the work of the Federal Subsistence Management Program. The Board appreciates that the Council recognizes Office of Subsistence Management staff dedication and hard work to fulfill the mission and mandates of the Program.

We recognize that you are uniquely positioned to offer first alerts to changing conditions and important trends that impact subsistence in your region. The Board appreciates and values the traditional knowledge, observations, and expertise you share. We make informed decisions thanks to the knowledge that you provide.

In closing, I want to thank you and your Council for your continued involvement and diligence in matters regarding the Federal Subsistence Management Program. I speak for the entire Board in expressing our appreciation for your efforts. Federally qualified subsistence users of the Southcentral Region are well represented through your work.

Sincerely,



Anthony Christianson
Chair

Enclosure:

Encl for Topic 3 – NPFMC Chum Bycatch Outreach Report

cc: Southcentral Alaska Subsistence Regional Advisory Council

Federal Subsistence Board

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



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Bering Sea Chum Salmon Bycatch

Outreach and Engagement Report

February 2026

Introduction

The North Pacific Fishery Management Council (Council) is considering new management measures to reduce chum salmon bycatch in the Bering Sea pollock fishery, particularly the bycatch of Western Alaska chum salmon. The proposed management changes are being considered in light of the recent and ongoing declines in abundance and the critical importance of chum salmon to rural and Alaska Native communities' subsistence way of life and economies.

To aid the Council in its consideration of different opportunities for outreach and engagement in the development of this action, the Council received a [discussion paper](#) on this topic at its October 2024 meeting. Upon review of that discussion paper and receiving public comment, the Council reiterated its interest in receiving invitations to engage with communities, Alaska Native Organizations, and Tribal entities to ensure the venue and timing of engagement activities are appropriate for the community. The Council subsequently received a formal invitation to participate in the Tanana Chief's Conference 2024 Fall Special Convention at its October 2024 meeting which is also covered in this report. The Council also indicated its interest in committing Council members' and staff time to participating in several Regional Subsistence Advisory Council (RAC) meetings in 2025.

Outreach and engagement activities are not official meetings of the Council. No more than five Council members (i.e., a non-quorum) are allowed to participate in any single event. As such, this report was prepared to document the outreach process and the information shared with Council members and staff at these events. Council staff documented comments provided at the engagement sessions, including the public testimony provided to the RACs at these meetings.¹ A short summary of each meeting is provided below. Note that the dates provided in Table 1 refer to the date on which the Council presentation and discussion occurred, recognizing that each RAC meeting was typically two to three days.

¹Transcriptions of the Federal Subsistence RAC meetings are available through the Department of the Interior: <https://www.doi.gov/subsistence/regions>.

Table 1. Summary of recent Council outreach and engagement activities on the Bering Sea chum salmon bycatch action

Outreach Event	Date and Location	Council Members	Staff
TCC Fall Special Convention	November 13, 2024 Fairbanks, Alaska	Ms. Angel Drobnica, Ms. Rachel Baker, Mr. Jon Kurland, Mr. John Moller, and Mr. Bill Tweit (in-person)	Kate Haapala and Sarah Marrinan (virtual)
Eastern Interior RAC	February 19, 2025 Fairbanks, Alaska	Ms. Angel Drobnica, Mr. Brian Ritchie, Mr. Rudy Tsukada, Mr. John Moller, and Mr. Bill Tweit (in-person)	Kate Haapala, Sarah Marrinan, Danielle Merculief (in-person), and Doug Shaftel (NMFS, virtual)
Western Interior RAC	February 25, 2025 Fairbanks, Alaska	Ms. Rachel Baker, Ms. Anne Vanderhoven, Mr. John Moller, and Mr. Steve Williams (in-person)	Kate Haapala and Sarah Marrinan (in-person); Danielle Merculief and Doug Shaftel (virtual)
Yukon-Kuskokwim Delta RAC	March 4, 2025 Bethel, Alaska	Ms. Rachel Baker, Ms. Nicole Kimball, Mr. Jon Kurland, Mr. John Moller, and Mr. Rudy Tsukada (in-person)	Sarah Marrinan, Danielle Merculief, Doug Shaftel (in-person), and Kate Haapala (virtual)
Kodiak/Aleutian RAC	March 7, 2025 Kodiak, Alaska	N/A	Kate Haapala and Sarah Marrinan (virtual)
Bristol Bay RAC	January 12, 2026 Anchorage, Alaska	Ms. Rachel Baker and Mr. John Moller	Kate Haapala and Sarah Marrinan

Tanana Chiefs Conference, Fall Special Convention

The Tanana Chief’s Conference (TCC) is an Alaska Native non-profit organization representing 42 member communities, including 39 villages, and 37 federally recognized tribes across the Interior Alaska region. The TCC region is extensive and covers approximately 235,000 square miles.

At TCC’s Fall Special Convention, Tribal Chiefs and members of the public shared the devastating impacts the limited Yukon River summer and fall chum salmon runs, as well as low Chinook salmon runs, have had in recent years for their Tribes and communities. TCC members emphasized that, when a species’ natural productivity is low, even relatively low bycatch years can exacerbate the problem. Concerns were also expressed over the potential negative impact that removals of Western Alaska chum salmon due to intercept in other fisheries beyond the Council’s authority.

During the session, TCC members were interested in the Magnuson-Stevens Fishery Conservation and Management Act’s 10 National Standards, given the Council must consider all of them when making a management recommendation to the Secretary of Commerce and the National Marine Fisheries Service (NMFS). Subsequent discussion focused on how the Council has historically balanced the National Standards, and some TCC members shared their perspectives that the National Standards have not been adequately balanced to protect subsistence opportunities. Related, attending Council members were asked

how public testimony informs the Council's recommendations. In response, Council members described the important role that Tribal representatives and subsistence users have played in forming the Council's recommendation to form the Salmon Bycatch Committee² as well as the purpose and need statement and range of alternatives for the current chum salmon bycatch action.

Finally, TCC members expressed frustration over the length of time it typically takes to have a management action implemented. It can take three to four years from the time a problem is identified, such as a need to reduce Western Alaska chum salmon bycatch, to a solution being implemented through the federal Council and rulemaking process. Subsequent discussion emphasized a need for immediate action, with many TCC members sharing that they are no longer able to go to fish camps to be with family and teach younger generations traditional ways of harvesting fish as well as the deep and broad impacts this has had on their communities and way of life.

RAC Outreach and Engagement

The Federal Subsistence Management Program is responsible for management of harvest and use by rural Alaskan residents of land mammals and upland game birds/non-migratory birds taken on Federal public lands and harvest and use of fish taken from waters within and adjacent to Federal public lands. This program divides Alaska into 10 subsistence resource regions (see Figure 1 below), each of which is represented by a Regional Advisory Council (RAC). The 10 RACs provide an opportunity for rural Alaskans to contribute to the management of subsistence resources by developing proposals to change Federal subsistence regulations, reviewing proposals submitted by others, and providing an open forum for public expressions, opinions, and concerns regarding any matter related to subsistence.

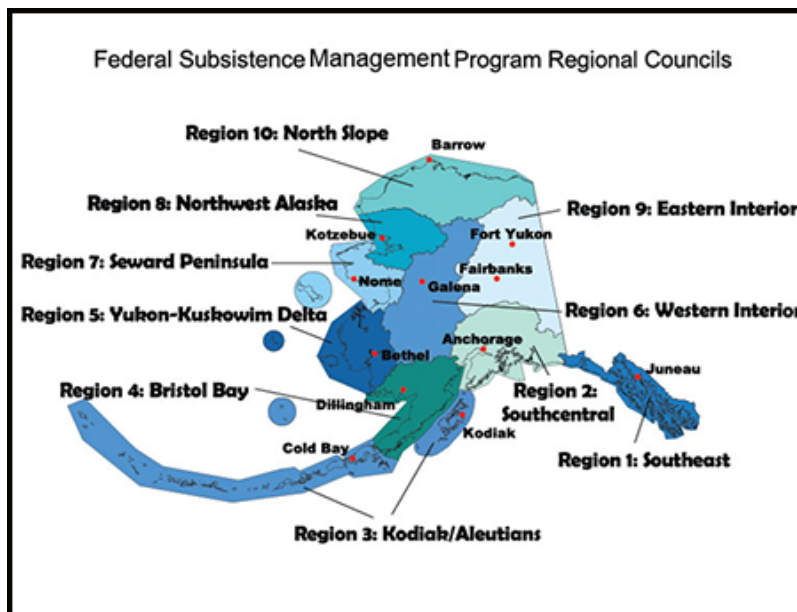


Figure 1. Map of areas covered by Alaska Federal Subsistence Management Program Regional Advisory Councils

Source: USDA.

² At its June 2022 meeting, the Council adopted a [motion](#) initiating the Salmon Bycatch Committee. The [Committee's March 2023 report](#) included recommendations for a purpose and need statement and initial set of alternatives for the Bering Sea chum salmon bycatch action.

Each RAC outreach session began with introductions, and either Council or NMFS staff provided a presentation on the Council, the current chum salmon bycatch action, and ways to be involved in the Council process. The primary purpose of these engagement sessions was to provide information and build relationships by facilitating discussion and dialogue among RAC and Council members. All RACs expressed appreciation for this opportunity, as did Council members. Participation and engagement from members of the public varied across the different sessions. The RAC engagement sessions, and meetings more broadly, were primarily attended by RAC members, State and Federal agency staff, community members, and representatives of non-profits. All RACs expressed interest in providing written comments to the Council and NMFS on the action prior to final action.

Eastern Interior RAC

The Eastern Interior region encompasses 37 communities (Region 9, Figure 1), and this RAC is currently composed of 10 members from the communities of Mentasta, Manley Hot Springs, Fairbanks, Rampart, Nenana, Eagle, Tanana, Arctic Village, and Fort Yukon.

The Eastern Interior RAC emphasized the importance of chum salmon, particularly fall chum salmon for communities across the Upper Yukon, for food and as part of the subsistence way of life. The RAC also emphasized the negative impacts that recent and ongoing declines in salmon abundance and subsistence closures have had on communities' food security, wellbeing, and ways of life.

RAC members were concerned about salmon bycatch in the Bering Sea pollock fishery, and many expressed frustrations over a perceived lack of action on bycatch management. Staff revisited the different alternatives being considered to reduce chum salmon bycatch in the pollock fishery. There was strong support for a hard cap under Alternative 2 as well as the inseason corridor options under Alternative 5, noting that the alternative was modified by the Council at its February 2025 meeting and the new impact analysis was not available at that time. Council members also shared how the pollock fishery has worked to reduce its chum salmon bycatch in recent years in response to the Council's request for immediate action (June 2022). Some RAC members were familiar with Chinook salmon excluder devices used for bycatch avoidance and asked for information on any recent and ongoing work to develop similar technology for chum salmon avoidance.

The Eastern Interior RAC raised questions regarding the pollock fishery's sustainability. Subsequent discussion focused on the Council's ecosystem-based approach to fisheries management as well as the National Standards, including National Standard 1 which states that "*conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.*" The subsequent discussion focused on RAC members' concerns over the wider ecosystem impacts of all trawl fisheries, declines in marine mammal and seabird abundance as well as salmon abundance in-river, and the important role that pollock play in the marine ecosystem. RAC members highlighted a disconnect between their views and definitions of sustainability and optimal yield and what is used in the federal management system. The RAC questioned the need to maximize pollock catch, and whether there is an inherent problem with not meeting optimum yield.

In light of broader ecosystem changes and concerns, RAC members highlighted a need for gravel-to-gravel salmon management. Many see the Council and NMFS as playing a potentially meaningful role in a coordinated management effort, while working with those dependent on salmon because salmon bycatch is one of many factors affecting salmon. At the close of the session, the RAC stated appreciation for the face-to-face dialogue with Council members and staff and reiterated the need to continue to strengthen a working relationship. The need for gravel-to-gravel salmon management was a key theme shared with Council members across all RAC meetings.

Western Interior RAC

The Western Interior region encompasses 37 communities (Region 6, Figure 1). The RAC is currently composed of 8 members from the communities of Ruby, Allakaket, Wiseman, Anvik, Ruby, Huslia, Galena, and Nulato.

The Western Interior RAC emphasized the importance of chum salmon as part of the subsistence way of life; many members expressed frustration and described the hardship from the recent and ongoing restrictions for subsistence fishing that negatively affect food security and wellbeing. RAC members also explained that these salmon declines have broad ecosystem implications, for example bringing more hungry bears into town and depleting in river nutrients, and they are seeking the Council's help in focusing on solutions to provide more food to people in their communities.

Following the staff presentation, RAC members emphasized an urgent need for action to reduce salmon bycatch in the pollock fishery and called for a B season closure of the pollock fishery. While bycatch in the pollock fishery is not the only contributing factor to lower salmon returns, RAC members emphasized the Council should consider a management strategy to reduce the pollock fishing pressure for a period during the year, since salmon spend so much of their life cycle in marine waters and to reduce bycatch during critical periods for salmon migration. They also acknowledged recent and ongoing declines in chum salmon abundance as a multi-faceted problem and emphasized their concerns around hatchery production. Similar to the Eastern Interior RAC, the Western Interior RAC requested that the Council establish gravel-to-gravel management frameworks.

The RAC broadly supported Alternative 5 with some RAC members indicating a preference for an inseason corridor that would prohibit fishing inside the entire corridor if the cap were met to protect chum salmon migrating from the Gulf of Alaska to the Bering Sea. Staff explained the approach suggested by the RAC generally reflected Option 1 of Alternative 5, but the potential impacts of that alternative had not yet been analyzed. Western Interior RAC members also stressed the necessity of anchoring limits to in-river salmon abundance and escapement data.

In addition, RAC members listed what they felt were deficiencies in the accuracy and timelines of salmon bycatch genetics data. At present, genetic analyses use biological samples collected by NMFS-certified observers stationed onboard pollock vessels or at shoreside processing plants. Complete genetic analyses of the salmon caught as bycatch are not available until spring of the next year. Staff explained the many factors influencing the production of final genetics analyses, including that Auke Bay Labs are completing multiple, different analyses for Chinook and chum salmon bycatch in the Bering Sea pollock fishery as well as Chinook salmon bycatch in the Gulf of Alaska pollock fishery. Additionally, observers that are onboard catcher-processors and motherships send biological samples to the Alaska Fisheries Science Center via mail only when these vessels are in port. It is common for these vessels to be at-sea for several weeks at a time which delays the lab's receipt of biological samples. Council members also shared recent and ongoing work by the Bristol Bay Science and Research Institute to provide inseason genetic analysis on a weekly basis. This work, which is being performed with analytical support from the Alaska Fishery Science Center, is intended to provide information that could aid the pollock fleet in avoiding Western Alaska chum salmon bycatch.

RAC members repeatedly expressed concern that bycatch estimates may not reflect the true number or biological significance of salmon taken, particularly regarding the maturity of chum salmon and their role in the broader ecosystem. They called for more detailed data on whether bycatch fish are adult, juvenile, or of specific genetic stocks, emphasizing that current data collection does not adequately inform conservation strategies. Additionally, there were questions about accuracy of observer census data, how observer count salmon, and how sampling is done. The reliability of the observer program was questioned

due to reports of harassment, unsafe conditions, and underreporting of bycatch. Staff discussed how each of these potential issues are documented, evaluated, and mitigated.

Yukon-Kuskokwim Delta RAC

The Yukon-Kuskokwim Delta region encompasses 42 communities (Region 5, Figure 1). The RAC is currently composed of 12 members from the communities of Nunapitchuk, Marshall, Kwethluk, Lower Kalskag, Quinhagak, Kotlik, Bethel, Akiachak, Russian Mission, Bethel, Alakanuk, and Mountain Village.

The Yukon-Kuskokwim Delta RAC meeting focused on the devastating impact of recent declines on communities, with many speakers citing multi-year restrictions on subsistence fishing that have decimated food security and cultural traditions. RAC members emphasized that chum salmon play different roles across communities. For instance, in some areas, chum salmon are a crucial food source for Elders because they are less oily, while in other communities, chum salmon have been an important food source for dogs.

Specific to the alternatives being considered to reduce chum salmon bycatch in the Bering Sea pollock fishery, the Yukon-Kuskokwim Delta RAC supported an approach to combine multiple alternatives. For instance, there was broad support for combining Alternative 5 (inseason corridor closures triggered by a chum bycatch cap) with Alternative 2 (an overall hard cap) to maximize bycatch reduction. Members advocated for a cap that is strict and meaningful, with suggestions that it be set low enough to trigger real reductions in bycatch, to reflect the urgency of the subsistence crisis in the Yukon-Kuskokwim region. RAC recommendations also emphasized a need for bycatch reduction strategies that reflect ecological science and Indigenous perspectives.

RAC members expressed concerns over climate and environmental changes which are further complicating salmon management, such as the loss of sea and river ice relied upon for subsistence harvest, intensifying storms like Typhoon Merbok, and new predator pressures such as expanding Northern pike populations. The timing of chum salmon harvests has also been affected, creating a misalignment in the timing of traditional processing periods (such as drying and jarring before late July rains) to support food security. Many participants expressed frustration that subsistence fishers face stricter regulations than the pollock fishery and called for more equitable rules that protect traditional lifestyles. They questioned why subsistence closures continue while the trawl fishery continues to operate without similar restrictions.

There was significant focus on the broader ecosystem impacts of the Bering Sea pollock trawl fishery, beyond salmon bycatch. Participants were also concerned with the bycatch of herring, crab, habitat, and marine mammals. Many RAC members and public participants were interested in ecosystem-based fisheries management approaches in light of concerns that trawl fisheries (beyond the pollock fishery) impact benthic habitats and the overall food web.

Kodiak/Aleutians RAC

The Kodiak/Aleutians region encompasses 28 communities (Region 3, Figure 1). The RAC is currently composed of 10 members from the communities of Cold Bay, Kodiak, Sand Point, Unalaska, and Dutch Harbor.

As noted in Table 1 above, Council members did not participate in the Kodiak/Aleutians RAC meeting and staff attended virtually. The Kodiak/Aleutians RAC was not identified by staff in the October 2024

discussion paper as a possible outreach venue because this region is not encompassed within the area where Western Alaska chum salmon caught as bycatch in the pollock fishery return to. However, the Council received public testimony at its October 2024 meeting requesting this RAC be considered because the issue is important to communities and RAC members.

Discussions at this RAC meeting were focused on understanding the proposed alternatives and options rather than making recommendations. However, RAC members were interested in the effectiveness of time and area closures, particularly rolling hotspot closures. The RAC discussed how these closures could be aligned with run timing data, acknowledging the potential for mismatches between peak bycatch periods and salmon migration patterns. Members sought clarity on how the rolling hotspot closures work in relation to the offshore and inshore sectors of the pollock fleet.

RAC members also asked for information on the proportion of Western Alaska chum salmon caught as bycatch in other, international trawl fisheries, and hatchery versus wild salmon in bycatch. Staff were able to look into this question and respond after the meeting. RAC members also emphasized the importance of continued engagement with regional stakeholders to ensure bycatch policies are tailored to protect salmon stocks critical to subsistence and commercial fisheries.

Bristol Bay RAC

The Bristol Bay region encompasses 31 communities (Region 4, Figure 1). The RAC is currently composed of nine members from the communities of Port Heiden, Naknek, King Salmon, Nondalton, Manokotak, Dillingham, and Togiak.

The Bristol Bay RAC's discussion highlighted concern about the impacts of bycatch occurring in the groundfish trawl fisheries, particularly for chum salmon, Chinook salmon, habitat, and marine mammals (walrus and seals), as well as their prey species. There was also discussion about herring bycatch in the pollock fishery, and some RAC members voiced opposition towards the Council's consideration of modifying the existing herring PSC limit. Several members noted changes they have seen in their ecosystem, in terms of species declines, but also decreased size (such as Chinook salmon), as well as species relocation (such as seals). Some RAC members spoke about the importance of supporting conservation efforts for salmon that are in decline in other regions and the broadscale impacts of those declines, and concerns for the long-term impact of bycatch given a single salmon can carry thousands of eggs. Related, there was interest in the monitoring program for the Bering Sea pollock fishery. While Council staff described the current program which includes both NMFS-certified observers, electronic monitoring systems, and observer reporting, some RAC members expressed skepticism about its effectiveness and supported stronger oversight. More broadly, there were some questions regarding enforcement.

RAC members expressed support for the Council's consideration of the current chum salmon bycatch action, with some members expressing support for Alternative 5. There was some discussion on the potential for the alternatives to create unintended consequences related to Chinook salmon bycatch, but there was broad agreement among RAC members that Alternative 1 (No Action) was insufficient. The Bristol Bay RAC was made aware of a recent comment letter submitted by the Eastern and Western Interior RACs to NMFS on the DEIS.