

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To
OSM.A24126

January 21 2025

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

Dear Chair Drobnica:

I write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Councils (Council) to share feedback on the preliminary draft Chum Salmon Bycatch Management alternatives.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska 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 on October 8-10, 2024, in Fairbanks. Among the items discussed were the preliminary Chum Salmon bycatch management alternatives. Although an updated version of the preliminary alternatives was later published on December 20, 2024, the Council's comments are still relevant to the options being considered during the North Pacific Fishery Management Council's (NPFMC) special February 2025 meeting on the subject. The Council voted to send the following comments for the NPFMC's consideration:

- **Alternative 1: No action** – The Council does not support this alternative because the status quo does not adequately minimize Chum Salmon bycatch. Additional measures are needed.
- **Alternative 2: Overall Bycatch Prohibited Species Catch (PSC) Limit for Chum Salmon** – The Council strongly supports an overall cap on Chum Salmon bycatch and a limit of 100,000-150,000 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 an on-going priority into the future.

- **Alternative 3: Chum Salmon PSC Limit with WAK Chum Threshold** – The Council does not support this alternative, as noted in our comments on Alternative 2.
- **Alternative 4: Additional regulatory requirements for Incentive Plan Agreements (IPAs) to be managed within the IPAs** – The Council supports further measures by industry to avoid bycatch of Chum Salmon. However, this alternative should not be implemented on its own without also establishing a PSC limit and time and area closures.
- **Alternative 5 (proposed by Advisory Panel): Time and Area Closures** - The Council strongly supports the implementation of time and area fishing closures, sometimes referred to as the establishment of a “conservation corridor”, to decrease the bycatch of Western Alaska salmon.

Overall, the Council believes that implementation of multiple alternatives is necessary for adequate protection of Chum Salmon. The combination should include setting a PSC limit, establishing time and area closures, as well as increasing regulatory requirements for IPAs.

Thank you for considering our comments on the Chum Salmon bycatch alternatives. We look forward to providing further feedback after the February 2025 NPFMC meeting during the outreach and engagement session. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Brooke McDavid, at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert “Charlie” Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and Game
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