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## 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.<sup>1</sup> 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.

<sup>1</sup>Transcriptions 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
<b>TCC Fall Special Convention</b>	November 13, 2024 Fairbanks, Alaska	Ms. Angel Drobnić, Ms. Rachel Baker, Mr. Jon Kurland, Mr. John Moller, and Mr. Bill Tweit (in-person)	Kate Haapala and Sarah Marrinan (virtual)
<b>Eastern Interior RAC</b>	February 19, 2025 Fairbanks, Alaska	Ms. Angel Drobnić, 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)
<b>Western Interior RAC</b>	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)
<b>Yukon-Kuskokwim Delta RAC</b>	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)
<b>Kodiak/Aleutian RAC</b>	March 7, 2025 Kodiak, Alaska	N/A	Kate Haapala and Sarah Marrinan (virtual)
<b>Bristol Bay RAC</b>	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.

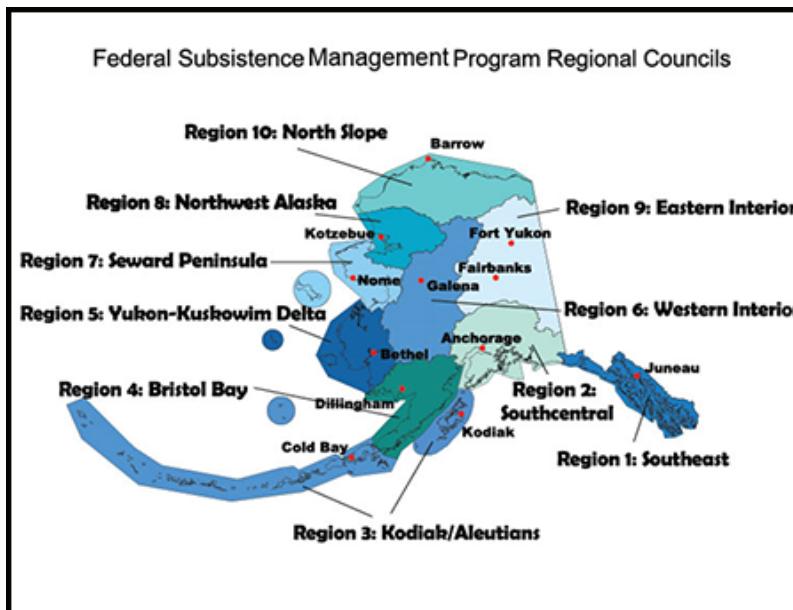
During the session, TCC members were interested in the Magnuson-Stevens Fishery Conservation and Management Act's 10 National Standards, given the Council must consider all of them when making a management recommendation to the Secretary of Commerce and the National Marine Fisheries Service (NMFS). Subsequent 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 Committee<sup>2</sup> 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.

<sup>2</sup> 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 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.