KAWERAK, INC.
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White Mountain
Natchiġvik

Tungwenuk Family Qupak Design, used with permission

December 24, 2025

From: Melanie Bahnke, President
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PO Box 948
Nome, AK 99762

To: Jonathan M. Kurland, Regional Administrator
Sustainable Fisheries Division
Alaska Region NMFS
P.O. Box 21668
Juneau, AK 99802-1668
Submitted via Regulations.gov portal

Re: NOAA-NMFS-2023-0089; Comment on DRAFT Environmental Impact Statement and Regulatory Impact Review for a Proposed Amendment to the Fishery Management Plan for Groundfish of the Bering Sea/Aleutian Islands Management Area – Bering Sea Chum Salmon Bycatch Management

Dear Mr. Kurland,

Kawerak, Inc. is herein providing written comment regarding the chum bycatch Draft Environmental Impact Statement (DEIS) currently under consideration by the North Pacific Fishery Management Council (NPFMC) and National Marine Fisheries Service (NMFS). Kawerak is the Alaska Native non-profit Tribal Consortium formed by and for the 20 federally-recognized Tribes of the Bering Strait region. Kawerak is also authorized to speak directly on behalf of the Native Village of Council regarding federal fishery matters in a government-to-government capacity.

Chum salmon, and other Pacific salmon species, are integral to the lifeways of the people and Tribes of our region. Salmon are crucial to the nutritional, economic, cultural, spiritual, and overall well-being of Kawerak-region Tribes. Every action taken involving salmon is imbued with meaning, culture, and learning – from sharing information about harvest timing and location, to care-taking the salmon during processing, to the sharing of salmon with close, and distant, relatives and

friends.[1,2,3] Our Tribes have stewarded the marine environment, including salmon, using our Traditional Knowledge (TK) since time immemorial. Tribal values and reciprocal relationships with marine species and resources include the principles of sharing and not wasting. As a result of this stewardship, a bounty was sustained through time which is now, among other things, commercially extracted from the oceans. And in the blink of an eye, under western resource extraction, science, and management, that bounty has turned into an ecosystem on the brink of collapse. While salmon returns and subsistence harvests across western and interior Alaska have declined – in some cases thereby permitting no subsistence fishing whatsoever – the pollock fleet wastes thousands of western and interior Alaska-origin salmon annually through bycatch in the offshore pollock fishery. The fleet has wasted millions of chum salmon over the course of decades, and in the past decade and half averaged approximately a quarter of a million bycaught chum salmon a year. The Norton Sound region has, in fact, been seeing problems with salmon returns for almost 5 decades, with a notable acute period in recent years; in this span, significant waste of salmon in commercial fisheries has occurred. There is an extreme imbalance in how the burden of conservation is shared, and this has been to the great detriment of Tribes, whom the Federal government has government-to-government relationships and trust responsibilities towards. In the meantime, the State of Alaska enforces conservation measures with severe effect on Tribal communities regarding subsistence salmon harvests whilst at the same time having a controlling interest in the appointments to the NPFMC, which has allowed millions of chum to be wasted. Both of these governmental entities need to connect with their responsibilities and humanity. The Tribal goal is to see zero bycatch of all species across fisheries, an ethos embodied in subsistence practices. While there are multiple factors involved in salmon declines, one of those factors – as indicated by the best scientific information available (which is inclusive of Traditional Knowledge) – is salmon bycatch – and this is something which NMFS and the NPFMC can manage. The long-running and recently particularly acute salmon crisis affecting western and interior Alaska communities is having devastating impacts on individual and community health and well-being, food security, economic stability, and cultural durability including intergenerational knowledge transfer. This crisis also has significant negative and cascading impacts on broader ecosystem health. It is time to implement meaningful action regarding chum bycatch, including the institution of a bycatch cap on the entire pollock fishery that is well below the historical bycatch average.

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[1] Ahmasuk, A., E. Trigg, J. Magdanz and B. Robbins (2008) Bering Strait Region Local and Traditional Knowledge Pilot Project: A Comprehensive Subsistence Use Study of the Bering Strait Region. Report for North Pacific Research Board Project 643. Nome, Alaska.

[2] Raymond-Yakoubian, B. and J. Raymond-Yakoubian (2015) "Always taught not to waste": Traditional Knowledge and Norton Sound/Bering Strait Salmon Populations. AYKSSI Project 1333 Final Product. Kawerak, Inc. Nome, Alaska.

[3] Raymond-Yakoubian, J. (2019) Salmon, Cosmology, and Identity in Elim, Alaska. PhD Dissertation, UAF.

In this letter, we outline the Alternatives which we believe should be selected for this action, and the rationale for our choices, and we provide comment on other elements of the DEIS including other Alternatives. We expect NMFS to advocate on behalf of the views of Tribal governments in the spirit not only of science and good management but also in the spirit of the trust responsibility and government-to-government relationship between Tribes and the Federal government.[4] Tribes and Tribal entities have been communicating the desire for a very low chum bycatch cap on the pollock fishery in a variety of settings for several years now, including in Tribal Consultation which "requires that information obtained from Tribes be given meaningful consideration, and agencies should strive for consensus with Tribes or a mutually desired outcome" (*ibid.*). We do not feel that NMFS has lived up to this spirit in its relationship with Alaska Native Tribes, and given the burden of the current salmon crisis on residents of the Norton Sound region and other communities across western and interior Alaska, we implore you to meaningfully and seriously consider the comments that we provide below. The salmon crisis, and the failure to meaningfully curtail salmon bycatch, has a direct negative impact on the sovereignty and self-determination of Tribes, and this represents a failure of the Federal government in meeting its government-to-government and trust responsibilities towards Tribes.

Recommended Action – What Kawerak Supports & Opposes

What Kawerak Opposes

Kawerak opposes Alternative 1. We oppose Alternative 3. We oppose the CDQ reserve pool in Alternatives 2 and 5. We oppose Option 3 in Alternative 5. We do not support Option 4 in Alternative 5. We oppose any caps numbers in Alternatives 2 and 5 which are not far below the historical bycatch average. Our support for Alternative 5 is contingent on the selection of Alternative 2 as well in combination. We support Alternative 4 but we oppose it being the only Alternative selected for action (i.e. it must be selected in combination with a low Alternative 2 fishery-wide cap and a low Alternative 5 corridor cap).

What Kawerak Supports

We recommend that the NPFMC select – and NMFS adopt and implement – a combination of Alternatives 2, 4, and 5, with the following specifics:

Alternative 2: A chum salmon PSC limit of 100,000 for the entire fishery; all non-Chinook salmon taken as bycatch during the B season would accrue to the limit, regardless of origin.

[4] Presidential Memorandum on Uniform Standards for Tribal Consultation (2022). https://bidenwhitehouse.archives.gov/briefing-room/presidential-actions/2022/11/30/memorandum-on-uniform-standards-for-tribal-consultation/

This is in our view a mandatory element of the action, and must be incorporated for this to constitute an actual action that will have a positive impact on wild chum salmon populations in western Alaska. Without an overall fishery-wide backstop hard cap which is substantially below the historical bycatch average, we believe that the action will not institute a true cap, would not meet the Purpose and Need nor be congruent with National Standard 9, and will essentially be an illusion of action.

Additionally, we are opposed to the CDQ reserve pool suboption.

Alternative 4: Additional regulatory requirements for Incentive Plan Agreements (IPAs) as noted in the NPFMC's February 2025 and analyzed in the DEIS.

We also recommend a number of additional measures to increase transparency. First, we recommend the fleet be required to share its bycatch reports with a number of Tribally-authorized entities; currently, these reports are not shared directly with Tribal entities by the fleet (and the proposed requirement regarding sharing with "salmon users" is insufficient to ensure sharing with Tribal entities). Secondly, we recommend the fleet be required to provide its data in a more usable format than is currently provided.

Alternative 5: We recommend that Option 1 be selected with a cap of 50,000. Option 1-Suboption 1 or Option 2 could be selected with a cap of 50,000, but those are both suboptimal versions of the corridor. We are opposed to Option 3. We do not support the selection of Option 4. Any corridor cap should accrue to the overall fishery-wide hardcap in Alternative 2.

Additionally, we are opposed to the creation of a CDQ reserve pool under Alternative 5.

Additional Note

In our view, the NPFMC did not meet the mandates in National Standards 2 and 9 in their crafting of these Alternatives nor the NEPA requirement to craft a reasonable range of alternatives. Far lower cap levels were requested by TK experts, and despite the fact that the industry has proven that lower bycatch can be achieved, lower cap levels were not incorporated into the Alternatives crafted for analysis. This leaves the lowest ends of the currently analyzed ranges of caps through a combined Alternative approach as the only meaningful possible action, when more conservation benefit could have been achieved. Additionally, we believe that most of what is contained within the Alternatives constitutes one or another version of inaction.

Detailed Rationale for Recommended Action

Comments regarding Alternative 1

Alternative 1 is unacceptable and does not meet the Purpose and Need. The Purpose and Need, though flawed, does include recognition of the dual long-running and acute nature of the salmon crisis, that bycatch is a part of the problem and improvements are needed, and that it is important to address cumulative impacts.

It is clear from the analysis that certain Alternatives taken together – as we recommend – would meet the Purpose and Need. After the implementation of Amendment 110 but prior to the public outcry over extreme levels of chum bycatch combined with severe stock and subsistence opportunity crises leading to the NPFMC initiating this action, the pollock fleet increased their bycatch of chum salmon by almost 200,000 fish a year on average compared to the years between the implementation of Amendment 91 and Amendment 110.[5] The absence of regulatory attention to the fleet's behavior clearly indicates a lack of appropriate industry and regulatory stewardship of the resource.

The fleet's reduction of their bycatch in the past few years since the Council initiated this action is not an argument in favor of not taking action (or solely pursuing industry-driven IPA changes as noted in Alternative 4); in fact, it is an argument for the opposite. The industry showed it was unwilling to make changes until there was public outcry and wide-scale resource devastation, which reinforces the need for meaningful regulatory measures to ensure that bycatch is minimized long-term. Additionally, the industry's ability to reduce chum bycatch in the past three years once public and management attention was focused on this matter (to 99,512 on average per year from 2023-2025, with chum bycatch well below 100,000 in 2024) shows that they can clearly operate under a requirement for what is defined in the Alternatives as a low cap (e.g. 100,000 chum per year fishery-wide).

Comments regarding Alternative 2

As noted, we endorse the selection of 100,000 for the fishery-wide hardcap as outlined in Alternative 2. We advocate for this being selected in combination with Alternatives 4 and 5. This Alternative is in our view an imperative element of the action that the NPFMC and NMFS take and implement.

[5] NMFS non-Chinook salmon mortality in BSAI pollock directed. Accessed December 2, 2025: https://www.fisheries.noaa.gov/sites/default/files/akro/chum_salmon_mortality2025.html

To remind NMFS and the NPFMC, earlier in the process for this action, we argued that reality itself had provided a reasonable lower bound for analysis for this action: the 22,000 chum caught as bycatch in 2012. This was reasonable because it had actually been achieved. We were rebuffed, and the NPFMC selected 200,000 as a lower bound, with most of the values being far above the historical average (which is still a problem). This was obviously incompatible with the Purpose and Need, with National Standard 9, and with the NEPA requirement for a reasonable range of alternatives. As such, the lower bound was modified to 100,000 bycaught chum fishery-wide after Tribal entities pointed out these problems. This is still unreasonably high, again seeming to betray the Council's and NMFS's desire to not take meaningful action to conserve salmon and to favor industry waste over Tribal subsistence rights and resources. And again, reality has borne out our earlier arguments: just in the last three years, industry has achieved a bycatch number of 35,000 in 2024, and an average below 100,000 for the three-year period. Any argument that the fleet cannot achieve lower than 100,000 chum bycatch has now been invalidated multiple times by reality itself and thus, among other things, any action which does not select a cap at least this low is incongruent with the mandate in National Standard 9, because this level of performance is clearly practicable to achieve without impacting the fleet's ability to obtain its TAC.

Without a fishery-wide cap acting as a backstop, any other measures taken as part of this action would not really be action, nor really a cap, nor meet the Purpose and Need. For example, Alternative 4 is insufficient on its own because industry has proven they were unwilling to conserve chum salmon when left to their own devices. Indeed, industry is already asking to increase the bycatch of yet another fishery resource (herring) as they hop from sacrificing one species to the next to protect the pollock TAC; we are in this current situation in part because of a similar jump from Chinook to chum bycatch following the implementation of Chinook bycatch regulations, and we are opposed to seeing a similar situation play out in coming years with herring or any other species. The NPFMC seems to treat the pollock TAC as if it is a sacred and an immovable object around which everything else must move, which is an obvious misapplication of the MSA and other mandates. Additionally, pollock catch has met or closely approached the pollock TAC in all recent years, including when chum bycatch has been low, indicating that bycatch can be minimized without the pollock industry forgoing catch. Alternative 5 does not present a real cap on its own either, as it does not constrain bycatch already occurring outside the corridor, nor does it prevent boats from moving outside the corridor once they hit the cap inside it, nor does it constrain bycatch after August 31 despite there still being months left in the B season after that point. Alternative 5 can be a surgical tool and perhaps an incentive for innovation (which is good, and why we endorse it at 50,000 accruing to the overall fishery-wide cap), but on its own, at best it is simply a hope, and at worst it is the illusion of action.

An argument that Alternative 2 does not meet the Purpose and Need's focus on western/interior Alaska chum, because the majority of the bycatch is not western Alaska (WAK)-origin, is not credible. First, it is a simple fact of the current ecosystem that the majority of chum in the Bering Sea are now of hatchery origin; given ecosystem dynamics and the current application of technology and the body of knowledge regarding marine resource use by chum, conserving solely WAK-origin chum salmon through bycatch regulation is not possible, but this does not mean that Alternative 2 will fail to have a meaningful conservation impact on WAK chum. Having a fishery-wide cap will in fact protect WAK chum; ~17 percent of the overall bycatch is significant. Perhaps most importantly, however, there is no mechanism in Alternative 5, the only other tenable Alternative that actually represents a potential action, to constrain bycatch outside the spatial and temporal bounds of the proposed conservation corridor, where and when substantial bycatch of WAK chum still occurs. Approximately 15 percent of bycatch outside of the corridor are WAK chum; this is not an insignificant amount. Thus, Alternative 2's function as a backstop to protect unconstrained WAK chum bycatch outside the spatiotemporal bounds of the corridor is in fact a necessary means of focusing protection on WAK chum and meeting the Purpose and Need. Similarly, any argument that Alternative 2 does not guarantee reductions in WAK chum is also untenable. While on its own at a high cap level this may be true given the varying genetic composition of the bycatch, in combination with Alternative 5 and/or at a low fishery-wide cap level this is certainly not true. As a backstop, Alternative 2 will prevent WAK chum from being bycaught in an unconstrained manner outside the temporal and spatial limits of the Alternative 5 conservation corridor.

The bedrock of this action must be Alternative 2 – a fishery-wide backstop hardcap. Furthermore, it must be substantially below the historical average (~268,000/year from 2011-2023) to help meet the Purpose and Need. The selection of the low end of the range under consideration – 100,000 – will provide clear conservation benefit, and history has shown it is eminently practicable and achievable (i.e., in 2012 and 2024). The goal is to solve the bycatch piece of the puzzle to help conserve and restore the chum resource. Of the PSC limits analyzed for Alternative 2, only 100,000 is substantially below the historical bycatch average. Furthermore, from the analysis it is clear to us that a fishery-wide bycatch hardcap of 100,000 chum salmon is the only acceptable option of the values presented in Alternative 2 because only a low PSC limit will significantly reduce chum salmon bycatch relative to the status quo. Statements which would support this view can be found throughout the DEIS; see, for example:

> "As expected, the greatest reductions were estimated under a 100,000-chum salmon PSC limit. As the PSC limit amount increases to the mid-point and upper end of the analyzed range, the reductions from status quo decreased" (p. 193).

> "However, if the pollock fishery was able to achieve total bycatch levels near the lower end of the range under the status quo (e.g., 2012, 2013, and 2023), WAK chum salmon bycatch would be expected to be reduced, although the proportions would still be variable" (p. 202).

This is additionally illustrated in Appendix 3, with regards to AEQ (e.g., Figure A3-10):

> "The savings would have been largest for the smallest cap (100,000) as fewer fish would have been taken as bycatch" (Appendix 3, p. 20).

A fishery-wide hardcap is needed for precautionary, climate-resilient, ecosystem-based fisheries management. The Council and NMFS claim to endorse all three of these approaches to fisheries management. For example, the Council recently adopted the Bering Sea FEP which endorses EBFM principles, and has taken recent strides to developing a climate-resilient and climate-ready fishery. The 1.4 to 2 million metric ton cap for the BSAI groundfish fisheries has been held up as a key component of the Alaska federal fishery's EBFM and as having notable stabilizing effects.[6] That backstop plays a crucial role in the management of the fishery. Similarly, a backstop is needed in this subcomponent of the management of the fishery – a backstop on the bycatch of chum salmon – and it will similarly help in conserving the resource, supporting EBFM practices, and providing climate-resilience in its inclusion in this action.

We are not taking a position on the various Options 1-4 under this Alternative. However, we are opposed to the Suboption, which establishes a CDQ reserve pool. This could raise chum bycatch over the corresponding hardcap by approximately 8 percent, and as such we oppose it for its potential negative effects on the conservation of chum salmon.

<u>Comments regarding Alternative 3</u>

We do not support Alternative 3 for a number of reasons.

The triggers for caps occur at conditions which allow for unacceptably poor abundance (they utilize the 25th and 50th percentiles). Recent conditions are unacceptably poor – which everyone recognizes, and this is the state of affairs noted as part of the Purpose and Need for this action. It is therefore illogical to base reductions in bycatch on abundance numbers that are at and even below the recent historical average, which this Alternative does. The data

[6] K. K. Holsman, A. C. Haynie, A. B. Hollowed, J. C. P. Reum, K. Aydin, A. J. Hermann, W. Cheng, A. Faig, J. N. Ianelli, K. A. Kearney, A. E. Punt. "Ecosystem-based fisheries management forestalls climate-driven collapse." In Nature Communications (2020) 11:4579. https://doi.org/10.1038/s41467-020-18300-3

found in the TK for the region suggests that using such a system would also constitute a shifting baseline syndrome, as they do not account for longer-term abundance problems outside the bounds of the analyzed time range (2011-2023) (documented at least in the Norton Sound region).[7] Utilizing 25th and 50th percentiles for triggers simply makes-acceptable what are clearly unacceptably low returns; this is implicitly recognized in the use of much higher percentiles in the abundance-based metric added more recently (i.e. at the February 2025 NPFMC meeting) in Option 3 in Alternative 5. For this reason, Alternative 3 is not defensible nor does it meet the Purpose and Need. Furthermore, many of the ranges for cap values are also far too high – anything over the historical average bycatch level is similar to inaction – and here again, Alternative 3 does not meet the Purpose and Need, nor does it meet National Standard 9's mandate to reduce bycatch to the maximum extent practicable. Additionally, in certain scenarios, there would be no limit on chum bycatch at all, which we clearly do not find acceptable and also believe runs contrary to National Standard 9 (reducing bycatch is practicable, so having no limit at all is incongruent with the mandate). There should be significant reductions in bycatch at all levels of abundance.

Additionally, bycatch cap triggers based only on abundance values from the previous year fail to consider relevant long-term variables and factors affecting chum population dynamics. A year of strong returns, which may be driven by a period of favorable ocean conditions, would belie long-term population trends in the region; consider, for example, that TK experts and social science has documented chum salmon abundance concerns spanning the course of multiple decades in the Norton Sound region. Furthermore, given that the implementation of bycatch management based on the Chinook three-river index has failed to improve western Alaska Chinook salmon runs, is not constraining on the fleet, and has not meaningfully improved bycatch performance in the fleet when comparing years prior to and after the implementation of Amendment 110,[8] we do not support taking the same flawed approach for chum bycatch management. We are also concerned about implementing any action with a substantial dependence on the State of Alaska's system of monitoring in-river escapement, which has clear deficiencies.

This Alternative would make acceptable bycatch that is much too high and abundance levels which are much too low. This is the opposite of what this action should be aiming for. And, again, this Alternative appears to be deprecated, as the ranges for abundance triggers in one Option in the new Alternative 5 presented in the NPFMC's February 2025 motion (i.e.,

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[7] Kawerak, Inc., Brenden Raymond-Yakoubian, and Julie Raymond-Yakoubian. "'Always taught not to waste': Traditional Knowledge and Norton Sound/Bering Strait Salmon Populations." 2015 Arctic-Yukon-Kuskokwim Sustainable Salmon Initiative Project 1333 Final Product. https://kawerak.org/wp-content/uploads/2018/04/TK-of-Salmon-Final-Report.pdf

[8] See: https://www.fisheries.noaa.gov/sites/default/files/akro/chinook_salmon_mortality2025.html

Alternative 5 Option 3) appear to have been an attempt to create more responsive percentiles, but changes were not correspondingly made to percentiles in Alternative 3, thus making the ranges in Alternative 3 essentially out-of-date with the current state of consideration and internally inconsistent across the suite of Alternatives.

Comments regarding Alternative 4

We support the implementation of improvements to the IPAs as noted in Alternative 4, and recommend adopting these improvements in addition to Alternatives 2 and 5. However, Alternative 4 alone cannot be the basis of this action. These improvements are already being implemented, but only as a result of external pressure. The industry has shown in recent decades that they cannot manage the resource appropriately on their own in the absence of a meaningful cap. Without a cap set in regulation, recent history has shown exactly what happens when industry is left to its own devices: staggering levels of chum bycatch. Alternative 4 on its own is inaction.

We also recommend other measures for transparency be considered in addition to that which is already noted in Alternative 4. The reporting which is currently shared in accordance with a select number of entities (including the NPFMC, the State of Alaska, and BSFA) should be shared directly with western and interior Alaska Tribally-authorized entities. Alternative 4 requirement #4 currently states: "Require IPAs to provide weekly salmon bycatch reports to Western and Interior Alaska salmon users to
allow for more transparency in reporting." This should have an explicit mention of Tribally-authorized entities, not just "salmon users." The sharing of information should also be as thorough-going as possible. Additionally, the IPA data which is made available can be difficult to work with, and identifying seasonal and annual trends can be challenging. This fleet data, which clearly drives Council decision-making, should be converted into a usable and downloadable database format that can be summarized and synthesized in spreadsheet or similar software for others to work with and interpret (rather than necessitating hours of key-punching as is currently the case with the weekly IPA reports provided in PDF format).

Comments regarding Alternative 5

A conservation corridor as noted in Alternative 5 allows for a potentially useful surgical tool to address areas of the greatest concern regarding the incidence of western/interior Alaska origin chum salmon bycatch. We endorse the inclusion of Alternative 5 Option 1 with a cap of 50,000 accruing to an overall fishery-wide hardcap in a combined action with Alternative 2 (with a fishery-wide hardcap of 100,000) and Alternative 4. Our comments below are only held assuming the adoption of a 100,000 fishery-wide backstop in Alternative 2. Alternative 5

without Alternative 2 is, as we note elsewhere, simply a 'hope' at best and the illusion of action at worst. Alternative 5 without Alternative 2 is unacceptable because it allows for unconstrained bycatch for fishing occurring outside the spatial and temporal bounds of the corridor (where and when significant amounts of bycatch occur and may even increase in the presence of a corridor). A corridor cap above 50,000 is similarly unacceptable, because it reduces the benefit of the corridor and also because it could lead to the choice of an even higher number than 100,000 for the fishery-wide hardcap.

Option 1 would provide for the most conservation benefit and would be our preference. For example, the DEIS notes that "Option 1 has high potential for reducing chum/WAK chum salmon PSC after a closure so long as the chum salmon PSC rates in the stat areas outside the corridor where fishing effort is redistributed to do [sic] are not substantially higher" (p.234). (Again, note that the implementation of an Alternative 2 cap in combination would greatly assist in mitigating concerns about bycatch from fishing effort outside the corridor.) Option 1-Suboption 1 and Option 2 provide less conservation benefit and also raise the question of the utility of such specificity (basing activity on specific statistical area combinations) in a changing climate. There are also concerns about which statistical areas have been selected. For example, statistical area 655430 would stay open in Option 1-Suboption 1 despite the fact that it has high numbers of chum bycatch with relatively high proportions of western Alaska salmon (as well as high amounts of Chinook bycatch), which does not make sense if the focus is on conserving these salmon; this seems contrary to the Purpose and Need for the action. Of Option 1, Option-1 Suboption 1, and Option 2, our preference is – by a significant margin – for Option 1, with a cap of 50,000 which accrues to the fishery-wide hardcap of 100,000. Option 1-Suboption 1 or Option 2 – with a cap of 50,000 that accrues to the fishery-wide hardcap of 100,000 – are much less ideal versions of a conservation corridor.

To illustrate an example of how the use of an Alternative 5 corridor without an Alternative 2 backstop is insufficient, consider the following, which utilizes an Option 1 corridor comprising all relevant statistical areas (likely the best version of the corridor for conservation). Based on the data in the DEIS, one is able to calculate, in the time range analyzed, the average WAK chum bycatch in and outside the June-August all-statistical-area corridor as well as across the entire fishery's B season, as well as the percentage of WAK chum bycatch in the overall bycatch in these different spatial and temporal boundaries. Using these historical averages, an action consisting of an Alternative 2 cap of 100,000 in combination with Alternative 5 Option 1 corridor cap at 50,000 produces an average savings of 29,547 WAK chum over the historical average, a 64 percent improvement. However, only utilizing the Alternative 5 Option 1 cap at 50,000 results in at best 21,823 saved WAK chum, a 17 percent decrease from the combined Alternative approach (this is at best a 47 percent improvement from the status quo, and is likely less than this given that this does not fully account for additional bycatch from fishing that

might be pushed outside the spatiotemporal bounds of the corridor as a result of the corridor cap). Even worse, these benefits rapidly decrease with even relatively small (compared to the range under consideration) increases to the corridor cap; at 100,000 for a corridor cap, for example, the percentage improvement over the historical average drops to 27 percent at best (again, it is likely less for the reason noted above). And this is the state of affairs for what is likely the most conservation-optimal version of the corridor (i.e, Option 1). The use of Suboption 1 or Option 2 on their own as a conservation corridor instead of Option 2 would not obviate the deficiency of a corridor-only approach to a cap, and in fact could very well result in even worse performance. This clearly shows the inadequacy of an Alternative 5 corridor cap as the sole cap action without being combined with a low Alternative 2 fishery-wide hardcap. Additionally, it is worth noting that the bycatch performance we are calling for in our recommendation is achievable at both the fishery-wide and corridor levels; for example, in 2012 and 2024, fishery-wide bycatch was below 50,000, so chum bycatch was also below this threshold in any version of the corridor area.

The approach we recommend – a dual cap consisting of a low corridor cap of 50,000 (preferably Alternative 5 Option 1's formulation) accruing to a larger overall fishery-wide hardcap of 100,000 (Alternative 2) – also allows for a sharing of the burden of conservation across sectors in the pollock fishery.

The ranges for Options 1-3 of Alternative 5 include – as in Alternatives 2 and 3 – an over-abundance of bycatch amounts well outside the range that should even be considered. Anything above or even in proximity to historical averages for bycatch can be reasonably seen as inaction, and many of these cap values are near, at, or even far above historical averages.

In addition to other reasons noted above, the inclusion of Alternative 5 Option 2 is particularly perplexing in the context of how earlier suggestions related to developing WAK-specific bycatch indices were removed from the scope of analysis because of potential concerns related to in-season implementability. While we feel there were a number of ways in which something of this character could have been explored which could have obviated concerns, this did not occur. Yet, Alternative 5 Option 2 was added at the most recent relevant NPFMC meeting and in our view was not even properly fully analyzable given the level of unknowns built into the Option (which ironically in no small part concern genetic data). For example, regarding Option 2, NMFS had to recommend in the DEIS that the Council in the future clarify its intent regarding "how the IPAs should use chum catch, pollock CPUE, and relevant genetic data to select stat areas" (p. 446), and could not make a similar statement or conclusion regarding reduction of chum and WAK chum salmon across the entire B season under Option 2 as could be made regarding Option 1 and Suboption 1 "because the stat areas that would close after the corridor chum salmon PSC limit is met are at present unknown" (p. 233).

Option 3 would not reflect a good ecosystem-based practice based on the inclusion of just one river system. Also, it does not provide a cap at all levels of abundance. Additionally, analysts note in the DEIS that "Option 3 would provide lesser conservation benefits compared to Alternative 5 without Option 3 because the management measure would be in effect each year. Option 3 would not confer greater conservation benefits than what could be realized under any inseason corridor option (Option 1, Suboption 1, or Option 2) alone" (p. 236). Therefore, we do not find this Option to be acceptable.

We do not support Option 4. Analysts note its impacts regarding herring PSC are "relatively neutral to status quo," and that this Option could result in increased herring bycatch or potentially not (p. 263). However, there are still significant policy concerns related to this Option. The clear purpose of this Option is the prioritization of meeting the pollock TAC over protecting the herring resource in light of potential purported challenges to the fleet presented by salmon bycatch regulation. This is compounded by an additional effort beginning at the October 2025 NPCM meeting to increase herring PSC for the pollock fleet.[9] We are concerned that what we are seeing here is tantamount to an unsustainable game wherein other species are disregarded as a rolling series of secondary concerns subservient to the pursuit of the pollock TAC.

Additionally, for the same reasons as noted under Alternative 2, we are opposed to the creation of a CDQ reserve pool under Alternative 5.

<u>Further thoughts regarding a combined-alternative approach</u>

It is important to note that any potential deficiencies of Alternatives 2 and 5 relative to the goal of the action are ameliorated by their combination, and there is no reason that they cannot be selected for this action at the lowest end of the ranges in both Alternatives (e.g. because it has been shown multiple times that the fleet can average under 100,000 chum bycatch overall – as well as under 50,000 overall and within any version of the corridor area – and still harvest its entire TAC, which must be the very definition of practicability as pertains to National Standard 9's mandate to reduce bycatch to the maximum extent practicable).

For example, as described above, the combination of Alternative 2 with Alternative 5 not only simultaneously mitigates the fact that an overall backstop addresses all chum salmon regardless of origin (and on average the majority of chum bycatch is non-WAK in origin) and

[9] NPFMC October 8, 2025 E Staff Tasking Council motion – Herring PSC. See: https://meetings.npfmc.org/CommentReview/DownloadFile?p=2cd5bf63-3c83-43b5-b1d5-9e6068b40a52.pdf&fileName=MOTION%20E%20Herring%20PSC%20Limit.pdf

that the proportion of WAK chum can vary from year to year in the bycatch, it also mitigates the large weakness of Alternative 5 in its failure to constrain bycatch spatially and temporally 'outside' the corridor (which entails a significant range of the fishery, the B season, and both actual and potential chum bycatch). And, as the DEIS notes, "'Layering on' an overall PSC limit to an inseason corridor chum salmon PSC limit would reduce the uncertainty associated with an inseason corridor PSC limit that would allow directed fishing to continue in exempt areas after it is met" (p. 38). It is also noted in the DEIS that:

> "[r]egardless of which chum salmon PSC limit is driving behavior, adopting both in combination would likely reduce bycatch compared to status quo. A benefit of this regulatory scenario is that the overall chum salmon PSC limit would constrain the total bycatch in a given year, limiting the total number of chum salmon that could be incidentally taken as bycatch outside the corridor both prior to and after a closure. It is expected that selecting Alternative 2 or 3 in conjunction with Alternative 5 would likely have conservation benefits for WAK chum salmon because the inseason corridor and closure window (June 10-August 31) spatially and temporally overlaps the majority of the WAK chum salmon bycatch since 2011" (p. 238).

There is a need for these corridor and backstop caps to be low in order for them to be meaningful. As the DEIS notes, "The relative effectiveness of a combined approach would depend on where the limits are set as lower or mid-range caps would create stronger incentives for bycatch reduction, while higher caps may lead to outcomes closer to status quo" (p. 38), and "[a]n overall and inseason corridor PSC limit set at higher amounts in their respective ranges (i.e., 100,000–550,000 and 50,000–350,000 chum salmon) would provide a weaker incentive for behavior changes compared to a combination of caps set at the lower or middle values of their respective ranges" (p. 238). The historical analysis shows this is entirely feasible for the pollock fleet to manage amounts of bycatch entailed in the lowest range of the caps. The DEIS also notes that "[s]electing Alternative 4 in conjunction with an overall chum salmon PSC limit (Alternative 2 or 3) or corridor chum salmon PSC limit (Alternative 5) is not expected to diminish the function or benefit of any other new management measure" and that "[t]he IPA's responses to the proposed regulatory provisions of Alternative 4 could be effective tools to reduce bycatch while operating under the PSC limits proposed in Alternatives 2 or 3 and/or 5." (pp. 238-9).

A combination of Alternative 2, Alternative 4, and Alternative 5 with low fishery-wide and corridor caps clearly provides a pathway – and, we would argue, very likely the only pathway in the existing Alternatives – to achieve a meaningful conservation benefit for chum salmon. This approach is also reasonable and achievable, as history has shown. It combines industry-driven

measures with true and clearly necessary regulatory action. It has strong promise of leading to the goal of conserving western and interior Alaska chum salmon, and it will also help fulfill various mandates (e.g. NS 2, NS9, the trust and government-to-government responsibilities towards Tribes, etc.).

Additional considerations not explicitly noted in the Alternatives

In the effort to protect, restore, and conserve salmon, it is also important that the NPFMC, the State of Alaska, NMFS, and the broader Federal government all:

- Promote improved data collection, modeling, and technology to effectuate the goals of salmon protection, restoration, and conservation. For example, there is a need to continue and prioritize research and development related to the implementation of real-time genetics in the pollock fleet.
- Incorporate Alaska Native Traditional Knowledge and values, and meaningfully collaborate with Tribes.
- Work to coordinate a large-scale approach with all relevant entities as appropriate, including Tribal entities, towards salmon restoration, conservation, and resilience.
- Ensure State and Federal attention to meaningful reduction of carbon emissions.
- Ensure State and Federal attention to marine and in-river habitat issues which are relevant to resource sustainability.
- Direct attention at the Federal level (e.g. the Department of State) to problems associated with large-scale hatchery salmon releases into the ocean, both foreign and domestic.
- Implement the mandatory review and revisiting of success or failure for this action. Review could be mandated for the program arising from this chum bycatch action after every certain number of years, as well as if particular metrics are not achieved (e.g. certain levels of western Alaska chum bycatch reductions fail to be met). This could lead to reconsideration of the overall approach.
- Explore the utilization of frameworking such that implementing real-time genetic analysis in the fleet could result in a more precise and effective implementation of these bycatch avoidance measures without necessitating a lengthy EIS process.

General Comments

A deficient approach overall

The NPFMC and NMFS have taken a flawed approach to chum salmon bycatch issues from the beginning, and we hope that in the upcoming NPFMC final action both entities will begin to address that. The ranges of allowable bycatch that were considered from the outset have not

been reasonable, were not science-based, did not meet the Purpose and Need, and did not reflect a commitment to address the problem of chum salmon bycatch. Much of the ranges in bycatch cap values currently under consideration lie well above the historical average, low ends for cap values which were actually achieved historically (now twice in the past 15 years and on average over the past three-year span) were not meaningfully considered, ideas which had direct connections to reductions in WAK chum bycatch were jettisoned or foregone (e.g. a WAK-specific bycatch index trigger) while industry ideas that were already occurring and others that were not even fully analyzable found their way into the Alternatives being considered in the DEIS, and the existing low end of alternatives had to be amended upon the recommendation of NMFS (following Tribal input) because the range originally under consideration was clearly not compliant with the NEPA requirement to consider a reasonable range of alternatives. Even now, the bulk of what is in the Alternatives under consideration essentially constitute inaction or the illusion of meaningful action in one form or another; again, Alternatives 1 and 4 are explicitly inaction, Alternative 3 is untenable, and large portions of the ranges of cap numbers in Alternatives 2, 3, and 5 lie above the historical average which is also a type of inaction.

The significant exclusion of TK in decisioning

The best scientific information available (BSIA), which is inclusive of consideration of Traditional Knowledge (TK),[10] indicates that bycatch is a part of the problem facing chum salmon stocks. This is well-documented in the literature regarding the TK in the affected region.[11] An inaccurate interpretation of the BSIA, one which was exclusive of TK, appears to have undergirded much of the Council-related deliberations and decisioning regarding this issue thus far – for example, as reflected in the weakness of the Alternatives as pertains to the range of cap levels for reducing bycatch.

The problems with AEQ and impact rate analyses

We have previously shared our concerns regarding AEQ and impact rate analyses and the value that is placed on them, and our concerns remain. In short, we oppose the use of AEQ and impact rate analyses to justify or minimize the impact of chum bycatch in the pollock fishery

[10] Raymond-Yakoubian, J., B. Raymond-Yakoubian, and C. Moncrieff (2017) The incorporation of traditional knowledge into Alaska federal fisheries management. In Marine Policy 78 (2017) 132–142. http://dx.doi.org/10.1016/j.marpol.2016.12.024

[11] For the Kawerak region, see e.g. Kawerak, Inc., Brenden Raymond-Yakoubian, and Julie Raymond-Yakoubian. "'Always taught not to waste': Traditional Knowledge and Norton Sound/Bering Strait Salmon Populations." 2015 Arctic-Yukon-Kuskokwim Sustainable Salmon Initiative Project 1333 Final Product. https://kawerak.org/wp-content/uploads/2018/04/TK-of-Salmon-Final-Report.pdf

and the need to meaningfully curtail it well below historical levels. AEQ and impact rate analyses should not be used as a rationale for failing to adopt low bycatch caps for the pollock fleet for this action.

Communities across western and interior Alaska are confronting a salmon crisis. We are concerned about chum bycatch at various levels (e.g. impacts on in-river abundance, inequity in the sharing of the burden of conservation, ecosystem-wide impacts, etc.). One of these concerns is the removal as bycatch of potential spawners. Dramatically declining salmon populations are leading to restricted subsistence opportunities across western and interior Alaska, and the removal of thousands of salmon that would have otherwise returned to the region to spawn is not insignificant; every fish that makes it to the spawning grounds is instrumental in maintaining and restoring declining chum populations. Additionally, significance is not something which can be measured by the modeled numbers of adult spawners but is, rather, a social calculus which occurs in the context of a crisis for both the stock and communities dependent on them for whom that fish is deeply interwoven with identity, ways of life, and social continuity. The importance of every salmon is highlighted by the fact that chum salmon escapement goals have not been met in many rivers across western Alaska in recent years,[12] and the benefits of increased chum returns to western Alaska rivers and communities remain even if, as suggested in the DEIS, the additional returns would not have caused escapement goals to be met in a particular year.

From an analytical perspective, we also find there to be substantial data constraints that limit the AEQ analysis and the import which can be attributed to it in terms of this action; these highlight the need for additional data and ground-truthing should AEQ and impact rates continue to be used in discussions of bycatch. These constraints include, as detailed by the DEIS authors, uncertainty surrounding age-specific marine mortality, age at maturity, relative fecundity of bycaught salmon, and stock-specific ages of bycaught western Alaska chum salmon. Traditional Knowledge about chum salmon – e.g. the impacts of waste on stock abundance – is also not taken into account in AEQ modeling. Despite these constraints, Figure A3-10 shows that of the values analyzed, only an overall chum salmon bycatch cap of 100,000 fish would be meaningfully different from the status quo, with the potential to return mature chum salmon to western Alaska rivers. Although the AEQ bycatch of CWAK chum salmon is estimated to be only a percentage of the total chum bycatch in the pollock fishery, when converted to numbers of fish, the AEQ accounts for thousands of chum salmon predicted to have successfully returned to western Alaska rivers to spawn; from 2011-2022, mean AEQ ranged from 11,539 chum in 2012 to 69,403 chum in 2017. Comparing AEQ estimated bycatch

[12] E.g. Liller, Z. W., and J. W. Savereide (2025) Escapement goal review for select Arctic–Yukon–Kuskokwim Region salmon stocks, 2025. Alaska Department of Fish and Game, Fishery Manuscript No. 25-04, Anchorage.

to the component of total chum bycatch estimated in those years to be WAK chum highlights the impact of unconstrained bycatch on western Alaska chum populations (i.e., the number of likely spawners being removed relative to the total number of WAK chum caught as bycatch), additionally supporting that a low fishery-wide bycatch cap (i.e., a cap of 100,000 under Alternative 2) would achieve the greatest conservation benefit. This is especially impactful on small, discrete spawning streams. Given that a single female chum salmon can release thousands of eggs, even one more chum returning and spawning benefits the overall health and sustainability of the population; the return of thousands of additional chum annually has long-term benefits to the species and to Tribes. This has not been captured in the AEQ model. By failing to account for the full life history of the salmon, an AEQ estimate is inconsistent with the concept of gravel-to-gravel management.

In addition to mortality from predation and other natural factors, chum salmon face numerous threats and stressors during the marine migratory period and, notably, as they are returning to natal rivers to spawn. There is a glaring lack of knowledge about the longitudinal as well as contemporaneous effects of cumulative stressors on chum salmon. These include climatic events such as unprecedentedly warm water temperatures, and the risk of being caught directly in the Area M intercept fishery and also as bycatch in the pollock fishery. Additionally, the cumulative impacts of decades of salmon bycatch remain unknown. There must be an attempt to minimize bycatch to the maximum precautionary extent possible to ensure that there are salmon in western Alaska rivers for generations to come. Management must occur in light of a context, and the context is a severe crisis for salmon and salmon-dependent communities; that is the referent which action should be oriented towards more than anything else (e.g. not AEQ models, etc.). The management action here should be commensurate with the context of the crisis which is occurring for salmon, and that calls for the most restrictive limits on bycatch possible. None of the proposed alternatives actually allow for the most restrictive limits, but we have suggested the only acceptable approach within the constraints of the existing DEIS Alternatives.

<u>Shortcomings of the retrospective analysis of potential economic impacts to the pollock industry (and related economies)</u>

As we have noted previously, the retrospective analysis of potential economic impacts to the pollock industry (and related economies) are not a sound basis for decision-making. The analyses related to potential forgone pollock and revenue that are presented in Sections 3.1.4 and 4.2 and Appendix 7, as well as elsewhere in the DEIS, are not supported by historical evidence, and do not reflect that the pollock fleet can and will change its fishing behavior in response to the implementation of bycatch caps. Analysts indeed note the latter caveat in the analysis itself. Concerns which have been voiced about economic impacts to the pollock fishery related to the institution of a bycatch cap are not new, and history does not show them to be

well-founded. Table 4-2 shows that from 2011-2023 (which is inclusive of the period since Amendment 91 up to 2023), the pollock industry utilized 94.4-106.8% of their initial B season TAC, and 94.4-100% of TAC annually; this is similarly supported by the Eastern Bering Sea Pollock Stock Assessment,[13] which reports that the fleet utilized 100% of its TAC in 2024 whilst reducing chum bycatch to 35,130. These data indicate that the pollock fishery is able to minimize bycatch without sacrificing pollock landings; in addition to the 2024 data, this is exemplified by the 2012 data reported in the DEIS – 101.3% of the initial B season TAC and 100% of the annual TAC were utilized, and 22,172 chum were bycaught in the B season (22,183 total in 2012). Furthermore, Table 4-3 shows that, from 2011-2023, total gross ex-vessel value of B season pollock ranged, in millions of 2022 dollars, from $262.3-$331.20. Over the same period, gross first wholesale revenue ranged from $789.90-$1,032.70. In fact, the highest ex-vessel and gross first wholesale revenue values were documented in 2012, the year in which chum bycatch was minimized to 22,183 fish.

While similar economic calculations were presented in the Bering Sea Chinook Salmon Bycatch EIS related to Amendment 91,[14] publicly available commercial fishing data covering a longer period than what is included in the DEIS do not support an argument that the adoption of Chinook salmon bycatch caps negatively impacted pollock fishers' ability to fish or the fishery's annual ex-vessel value. Analyzing non-confidential data on pollock landings in Alaska from 1976-2023[15] and plotting ex-vessel value (converted to 2023 dollars) per year revealed that from 2011-2023, following the implementation of Amendment 91 and the Chinook salmon bycatch caps, the annual ex-vessel value was only below the average in one year; this holds true when narrowing the analyzed time period to 1989-2023.

[13]Ianelli, J., T. Honkalehto, S. Wassermann, A. McCarthy, S. Steinessen, C. McGilliard, and E. Siddon (2024) Assessment of walleye pollock in the eastern Bering Sea. North Pacific Fishery Management Council, Anchorage, AK.

[14]Mecum, R. D., and E. C. Schwaab (2009) Bering Sea Chinook salmon bycatch management. Vol. 1, Final environmental impact statement. https://repository.library.noaa.gov/view/noaa/3853

[15] NOAA Fisheries Commercial Landings Database. Accessed December 7, 2025: Fisheries One Stop Shop (FOSS) | NOAA Fisheries | Landings

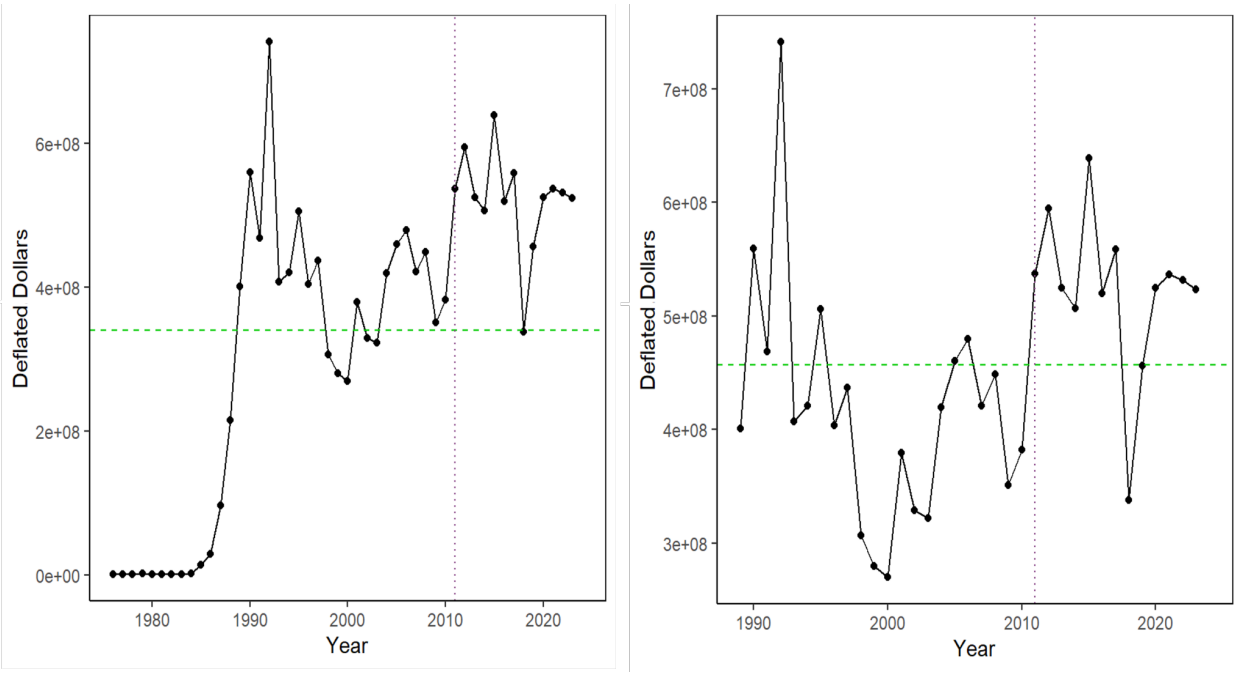

Figure 1: Annual pollock ex-vessel value (in millions of 2023 $) from 1976-2023 (left) and 1989-2023 (right). The horizontal dashed line represents the time period average. The vertical dotted line reflects the 2011 implementation of Amendment 91.

The above clearly illustrates that the fleet can adjust in the face of a cap, whilst undercutting potential concerns that achieving low bycatch would be tied to meaningful negative economic impacts for the pollock fleet. Given that hypothetical negative impacts on pollock catch and revenue – which were discussed in previous retrospective analyses of the potential projected effects of salmon bycatch regulations – did not materialize, and given that the pollock fleet has achieved instances of low chum bycatch without forfeiting pollock landings, it is reasonable to conclude that a low fishery-wide chum bycatch cap of 100,000 combined with a corridor cap of 50,000 (which would protect WAK chum salmon and meet the Purpose and Need) could be implemented without negatively or insurmountably inconveniencing the pollock industry in their pursuit of the pollock TAC.

<u>In Conclusion</u>

Chum salmon is a key species in the marine ecosystem, for Tribal communities, and broadly for Alaskans, and it is time to address the cumulative and ongoing impact of the extreme waste of chum salmon in the Eastern Bering Sea pollock fishery's bycatch. Tribes and Tribal members are inordinately bearing the burden of conservation, watching stocks collapse and facing severe fishing restrictions while at the same time the pollock fleet wastes tens and hundreds of thousands of chum annually, many of which are bound for western and interior Alaskan rivers.

The Alternatives under consideration do not reflect the mandates related to the trust responsibility and government-to-government relationship that the Federal government has towards Tribes, nor a respect for National Standard 2, as their overly permissive bycatch ranges do not give adequate weight to the long-term, TK-based stewardship of chum salmon and TK's lessons about waste, nor to the historical record illustrating what is already clearly possible related to bycatch in the pollock fleet. Everything under consideration here is an extreme compromise for Tribes who have been repeatedly asking for zero bycatch.

Despite this, we believe that at the low end of the ranges a combination of an Alternative 2 fishery-wide cap along with an Alternative 5 corridor cap, plus Alternative 4, can provide conservation benefit for chum salmon and provide a basis for helping to protect and rebuild the stock in terms of the federal fishery part of the challenge. A low fishery-wide hardcap is the bedrock of the action, and without it any action is a hope at best and is not meaningful action. We strongly encourage NMFS and the NPFMC to work towards the selection and implementation of a combination of an Alternative 2 fishery-wide hardcap of 100,000, plus Alternative 4, plus an Alternative 5 Option 1 corridor cap of 50,000.

Sincerely,

Melanie Bahnke

Melanie Bahnke
President, Kawerak, Inc.

Attached (below): Kawerak Board of Directors March 2023 Resolution Regarding Chum Bycatch

KAWERAK. INC.

REPRESENTING
Brevig Mission
Sitaisaq
Council
Diomede
Iŋaliq
Elim
Niviarcaurluq
Gambell
Sivuqaq
Golovin
Chinik
King Island
Ugiuvak
Koyuk
Kuuyuk
Mary's Igloo
Qawiaraq
Nome Eskimo
Sitnasuak Inuit
Savoonga
Sivungaq
Shaktoolik
Saktuliq
Shishmaref
Qikiqtaq
Solomon
Aŋuutaq
St. Michael
Taciq
Stebbins
Tapraq
Teller
Tala
Unalakleet
Uŋalaqłiq
Wales
Kiŋigin
White Mountain
Iġałuik / Nutchirviq

RESOLUTION 2023-01

A RESOLUTION REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL REDUCE CHUM SALMON BYCATCH IN THE BERING SEA

WHEREAS, the North Pacific Fishery Management Council (NPFMC), in association with the National Marine Fisheries Service, is charged with responsible management of marine fisheries resources in Alaska; and

WHEREAS, Kawerak, Inc. is a tribally authorized non-profit Tribal consortium whose mission is to assist, promote and provide programs and services to improve the social, economic, educational, and cultural well-being of the people within the Bering Strait region; and

WHEREAS, the Tribes of the Bering Strait region include: Brevig Mission, Council, Diomede, Elim, Gambell, Golovin, King Island, Koyuk, Mary's Igloo, Nome, Savoonga, Shaktoolik, Shishmaref, Solomon, Stebbins, St. Michael, Teller, Unalakleet, Wales and White Mountain; and

WHEREAS, the Bering Strait region has experienced long-standing problems related to chum abundance, and Western and Interior Alaska have collectively experienced sharp declines in recent years, all amidst long-running waste of chum through bycatch in the Eastern Bering Sea pollock fishery; and

WHEREAS, subsistence fishing activities are a priority for the residents of the Bering Strait region and constitute a vital role in our cultures and traditions, and these activities have been negatively impacted by the loss of chum salmon from our region's rivers; and

WHEREAS, our Tribes and communities are committed to our traditional values of not wasting, sharing, respect, and reciprocity (among others), including in relation to salmon and the environment; and

WHEREAS, the North Pacific Fishery Management Council is considering developing measures to reduce incidental chum salmon bycatch in the Bering Sea pollock trawl fishery; and

WHEREAS, Kawerak, Inc. believes the explicit goal of the NPFMC, the pollock industry, and the National Marine Fisheries Service should be zero bycatch of chum salmon; and

WHEREAS, proposed alternatives must adequately recognize the importance of this issue to the Tribes of the Bering Strait region and other western Alaska and Interior communities, and emphasize the devastating impacts of chum bycatch on the cultures, traditions, health and economies of our regions; and

NOW THEREFORE BE IT RESOLVED, that Kawerak, Inc. requests that the NPFMC take steps, beginning with analysis and including implementation of regulation, towards significant reduction of chum bycatch in the Eastern Bering Sea pollock fishery; strive towards a goal of zero bycatch across all species, including chum and chinook; promote improved data collection, modeling and technology to effectuate these conservation goals; and incorporate Alaska Native Traditional Knowledge and values, and meaningfully collaborate with Tribes in the process of doing this.

CERTIFICATION

We, the undersigned Chairman and Secretary of the Kawerak, Inc. Board of Directors hereby certify that the foregoing resolution was adopted by majority vote of the Board during a duly called meeting on March 15, 2023.

By: _____ _____

Kawerak Board Chairman Kawerak Board Secretary