

United States Senate

WASHINGTON, DC 20510

January 30, 2026

Ms. Angel Drobica
Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Agenda Item C2: Chum Salmon Bycatch – Final Action

Dear Chair Drobica:

Next week, the members of the North Pacific Fishery Management Council (Council), and the Advisory Panel will be reviewing agenda item C2: Chum Salmon Bycatch to potentially take final action from a set of alternatives with the intent to reduce Alaska origin chum salmon caught as bycatch in the Bering Sea pollock fishery. Normally, I refrain from commenting in my official capacity on management decisions under your jurisdiction. However, due to the significance of this agenda item and its broader impacts on Alaskans and chum salmon-reliant communities, I respectfully submit this comment letter. I wish to underscore how important it is that the final action chosen by the Council reflects a path forward to conserve and rebuild chum salmon populations to protect the people and communities that depend on this species. In addition, I acknowledge the actions the Council has taken to mitigate and reduce Alaska salmon bycatch in the Bering Sea pollock fisheries.

For generations, Alaska's fisheries have been the mainstay of our economy, culture, and way of life. However, Alaskans across our state from coastal communities to Interior villages have been voicing concern over the dramatic declines, and in some instances, the collapse of important commercial, subsistence, and sport fished species. Right now, some salmon runs, such as Chinook and chum salmon in the Yukon River, are experiencing resource failures, causing social, cultural, and economic crises in many of our communities. Responding to this challenge has been and remains a top priority of mine through legislation and actions I have taken as Alaska's U.S. Senator. For example, I have seen how other countries, specifically Russia and China, devastate fish stocks through fishing operations that undermine our hardworking Alaska fishermen and coastal communities. I successfully led the effort to get a Russian seafood ban in place during the Biden Administration and closed a loophole that prevented Russia from laundering their Russian trawled fish through China. I am committed to ensuring these bans remain in place to exemplify how important it is that our seafood harvests are managed and processed in a sustainable way.

My Alaska Salmon Research Task Force Act enacted into law in 2022 created a Task Force that brought forth a variety of salmon experts including the establishment of an Arctic-Yukon-Kuskokwim Working Group. The Task Force published a final report in July 2024 that identified applied research needs and policy recommendations that would help inform and address negative

influences on Alaska salmon productivity. This report also identified “marine harvests and bycatch” as one of seven potential impacts hindering their productivity, with emphasis on addressing these.

As you know, the Council first began implementing the Fishery Management Plan (FMP) for groundfish in the Bering Sea and Aleutian Islands in 1982. Since then, six amendments have been made to this FMP to manage or directly reduce Chinook and chum salmon bycatch in the Bering Sea pollock fishery. These amendments show the evolution of different adaptive management methods used to reduce and avoid salmon bycatch by the pollock harvesting sectors. The first amendments started in the mid-1990’s with the establishment of Chinook and Chum salmon savings areas, and hard caps on the amounts of Chinook and chum salmon that can be taken as bycatch that would trigger closing these savings areas during peak times of the year when high volumes of salmon were taken. This also included increased mandatory observer coverage. These early adaptations were in response to high levels of chinook and chum salmon bycatch in the fishery, and low levels of salmon returns in many Alaska rivers, but especially in Western Alaska river systems. Further revisions were made through these amendments in the mid-to-late-2000’s to try various other approaches, including real-time active avoidance areas during the fishery and the observer program using video monitoring in their observer coverage methods. The latest amendment made to the FMP included revisions that were made to be more comprehensive in salmon bycatch reduction methods to include chum salmon in Incentive Plan Agreements, along with linking low levels of Chinook salmon abundances to their hard bycatch limits.

As you know, other management actions have been taken to ensure conservation of another species under this same FMP. In 2024, Amendment 123 was implemented to revise the static halibut bycatch limits in the non-pollock groundfish sector by annually adjusting the halibut bycatch limits based on recent halibut abundances. Still, this amendment wasn’t made without strong opposition. When NOAA Fisheries took action to implement this new regulation in 2023 it prompted a lawsuit from the Amendment 80 fleet challenging this new rule to be in violation of the Magnuson-Stevens Fishery Conservation and Management Act, the Administrative Procedure Act, and the National Environmental Policy Act. I opposed this lawsuit and actively intervened in this litigation by leading on an amicus brief supporting the Council’s decision and Alaska’s halibut fishermen—subsistence, sport, and commercial. We ended up prevailing against the Amendment 80 fleet. The lawsuit was dismissed in 2024, affirming the Council’s lawful recommendation.

Despite these adjustments to avoid and reduce Chinook and chum salmon bycatch in the Bering Sea pollock fishery, the abundance of these salmon has remained depressed, causing the continued closure of vital subsistence fishing opportunities for numerous communities across the state. Even as science, data collection methods, and monitoring tools that support management decisions advance, the process for making and implementing management actions and policies remains slow and at times appears unresponsive. Nonetheless, the best available science and novel frameworks allow managers creativity and innovation when making decisions. Any call for action must consider current and future interactions of our fisheries with other environmental and anthropogenic factors in our changing marine ecosystems, such as competition from non-U.S. origin hatchery fish. To continue to help strengthen fisheries management and reduce bycatch in Alaska’s fisheries I introduced the Bycatch Reduction Act in December 2025. The legislation builds upon my Alaska Salmon Task Force Act and would enhance marine environmental data

collection in the Bering Sea, Aleutian Islands, and the Gulf of Alaska. It prioritizes the development and deployment of technologies that support scientific research, aims to reduce and avoid bycatch through new innovative policies, and protect marine seafloor habitats. Greater scrutiny of who harvests and benefits from our fisheries must be given careful consideration to balance the social and economic tradeoffs of bycatch avoidance and reduction efforts.

Thank you for the opportunity to provide these comments. I firmly believe that any final action must reflect a path forward to conserve and rebuild chum salmon populations and to protect the people and communities that depend on these species in struggling river systems. I appreciate the Council advancing ecosystem-based fisheries management and approaches that allow our fisheries to remain adaptive to environmental change. As always, I urge you to communicate any federal barriers preventing your swift action on this issue, particularly any necessary revisions to the MSA and other obstacles that may be holding the Council back from applying holistic policies that would better enable you to act decisively to respond to the legitimate concerns of Alaskans with regard to our salmon run declines.

I would appreciate an update on the result of the final action for this agenda item at the conclusion of this February NPFMC meeting.

Sincerely,



DAN SULLIVAN
United States Senator