



## Healy Lake Traditional Council

We are the Mendas Cha-ag People.

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Dear North Pacific Fishery Management Council Members,

Thank you for the opportunity to comment on the Preliminary Draft Environmental Impact Statement-Bering Sea Chum Salmon Bycatch Management. The relationship between chum salmon and the Healy Lake Tribe (Mendas' Cha'ag) is fundamental to our cultural identity, community well-being, and ecological balance. However, the significant decline in chum salmon populations threatens our food security, health, and the preservation of cultural and spiritual traditions that have endured for thousands of years.

Chum salmon have sustained the Healy Lake Tribe for over 11,500 years. Archaeological findings, such as those at the Upward Sun River site, highlight the central role salmon has played in our ancestors' diet and culture. Today, fish camps continue this legacy, serving as spaces for family bonding, intergenerational knowledge sharing, and spiritual renewal. The loss of salmon undermines these practices, eroding cultural transmission, food security, and mental and physical well-being.

Bycatch in the Bering Sea pollock fishery has severely impacted chum salmon populations. In 2021 alone, bycatch reached 546,000 non-target salmon, disrupting migration patterns and depleting stocks critical to subsistence communities. This unsustainable bycatch has compounded the effects of climate change and habitat loss, intensifying challenges for the Healy Lake Tribe and other Indigenous communities.

We urge the NPFMC to take immediate action to address this crisis. Specifically, we recommend:

1. **Setting Lower Bycatch Limits:** Establish Prohibited Species Catch (PSC) limits at or below 100,000 fish annually to reflect the urgent need for conservation. Since 2011, over 600,000 WAK chum were caught as bycatch.
2. **Establishing In-Season Corridors:** Implement dynamic management measures to protect salmon migration routes from pollock fishing operations.
3. **Strengthening Incentive Plans:** Enforce stricter bycatch reduction strategies and penalties for noncompliance.
4. **Incorporating Traditional Knowledge:** Collaborate with Indigenous communities to integrate ecological knowledge into fisheries management.

Protecting chum salmon is not only ecological stewardship—it is a matter of justice and survival. Indigenous communities have relied on salmon sustainably for millennia. Without immediate action, the loss of salmon jeopardizes our cultural heritage, food security, and community health.

We call on the NPFMC to lead in restoring this vital resource. The future of our people, our traditions, and the ecosystems we all depend on rests in your hands.

Sincerely,

1st Chief Elias Saylor

Healy Lake Traditional Council