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January 30, 2026

North Pacific Fishery Management Council
1007 West Third Ave., Suite 400
Anchorage, AK 99501

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

Dear Chair Drobnica and Council Members,

On behalf of the Northern Alaska Environmental Center (Northern Center), we urge the Council to adopt the most precautionary and conservation-oriented final action for chum salmon bycatch: **Alternative 2 with a 100,000-fish hard cap, Alternative 4, and Alternative 5 Option 1 with a 50,000-fish cap**.

From a habitat and ecosystem perspective, chum salmon are a keystone species whose ecological role extends far beyond fisheries yield. They transport marine-derived nutrients into freshwater and riparian systems, sustain wildlife populations, support aquatic food webs, and maintain the ecological productivity of rivers across Western and Interior Alaska. When chum salmon are intercepted at sea, the ecological consequences are felt throughout entire watersheds—reducing nutrient cycling, weakening habitat productivity, and diminishing ecosystem resilience.

Chum salmon populations are already under pressure from climate change, warming ocean conditions, altered prey dynamics, freshwater habitat stress, and cumulative human impacts. Continued high bycatch in the Bering Sea pollock fishery compounds these stressors and increases ecological risk at a time when salmon-dependent ecosystems need stronger buffers, not additional mortality.

Adopting Alternative 2 (100k cap) would establish a meaningful, enforceable ceiling on bycatch that aligns with precautionary conservation. Alternative 4 strengthens accountability and responsiveness, improving the Council's ability to protect vulnerable stocks in real time. Alternative 5 Option 1 (50k cap) provides the highest level of protection during periods of

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elevated risk—ensuring that ecosystem integrity and long-term salmon recovery take priority over short-term operational flexibility.

Voluntary measures or incremental efficiency gains alone are insufficient to safeguard salmon's ecological function in an era of accelerating environmental change. Hard caps and binding accountability are necessary to prevent further erosion of salmon-driven ecosystem processes and to ensure that conservation burdens are not displaced onto freshwater habitats, wildlife, and communities that have already experienced severe ecological loss.

This final action is an opportunity to affirm ecosystem-based management, uphold precaution under scientific uncertainty, and make a durable investment in the health of Alaska's marine and freshwater systems. We urge the Council to choose the strongest available conservation package.

Thank you for the opportunity to comment.

Sincerely,
Krystal Lapp, President
Northern Alaska Environmental Center