KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION
OUR RIVER, OUR PEOPLE, OUR FISH
P.O. Box 190 Bethel, AK 99559-0190 | (907) 545-7388 | info@kritfc.org | kuskosalmon.org

January 29, 2026

Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third Ave., Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252

RE: C2: Chum Salmon Bycatch – Final Action

Dear Chair Drobnica and Members of the Council,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) provides the following comments as you deliberate on Final Action for management of chum salmon bycatch in the Bering Sea pollock trawl fishery. KRITFC asks that you consider these comments alongside those that we submitted on the Draft Environmental Impact Statement (DEIS) to the Federal Register (Attachment 1).

KRITFC is a Tribally-authorized 501(c)3 non-profit that seeks to uplift the interests of the 33 Federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, as guided by our Yup'ik and Dené knowledge and values and the best available Western science. Since October 2023, KRITFC has served as a cooperating agency in the development and review of this DEIS and its previous editions. In this role, we have contributed our expertise of Kuskokwim River chum salmon, including Traditional Knowledge (TK), to this analytical process.

KRITFC urges the North Pacific Fishery Management Council (Council) to adopt the following combination of alternatives as its Preferred Alternatives for Final Action:
→ Alternative 2 at a Prohibited Species Catch (PSC) limit of 100,000 chum salmon, with
→ Alternative 4 in its entirety, with
→ Alternative 5, Option 1, at a PSC limit of 50,000 chum salmon.

This is the only combination of alternatives that:

- Meets the Purpose and Need of this action to reduce bycatch of Western Alaska (WAK; CWAK and Upper/Middle Yukon reporting groups) chum salmon.
- Balances the Council's obligations to National Standard 1 (to meet the optimum yield of fisheries after accounting for social, economic, and ecological factors), National Standard 8 (to ensure the sustained participation of fishing communities in fisheries, including Western and Interior Alaska communities in subsistence fisheries), and National Standard 9 (to reduce bycatch to the extent practicable).

- Demonstrates meaningful consideration of and action towards Alaska Native Tribal asks for action.

Kuskokwim River chum salmon stocks have reached record lows in recent years, devastating subsistence fisheries, local economies, food security, cultural practices, and the ecosystem upon which all our Tribes' ways of life depend (see KRITFC 2025 End-of-Season Summary, Attachment 2; see also KRITFC 2025[1]). The salmon situation in our communities has become an existential crisis. Yet, **while different management agencies, research entities, and fisheries point fingers at one another or at climate change as the culprit for these declines, subsistence fishers in the Kuskokwim and other Western and Interior Alaska rivers are shouldering the burden of conservation and restoration of these fisheries—and they are doing so alone.**

Kuskokwim people are doing all they can to bring back our salmon; we have nothing left to give. KRITFC thus asks for some of this conservation burden to be hoisted onto the pollock trawl industry's shoulders, too, by implementing the largest in-season corridor in known times and areas of WAK chum salmon encounters (Alternative 5, Option 1) and a cap across all vessels fishing the Bering Sea (Alternative 2), each at the lowest cap options for meaningful reduction of chum bycatch. We also ask for the six new provisions to the pollock industry's Incentive Plan Agreements (IPAs) to be added to the regulations governing these contracts (Alternative 4).

The Bering Sea pollock trawl fishery is one of the many factors that, cumulatively, have contributed to present-day salmon declines, as detailed in Appendix 8 of the DEIS. While annual waste of chum salmon as bycatch in this fishery may seem negligible in any given year, these numbers add up to big losses. **Looking at NOAA's own genetic data, since 2011—or in the past 15 years—more than 615,000 WAK chum salmon have been removed from the ecosystem by the Bering Sea pollock trawl industry** (Figure 1). This has eliminated any chance for these fish to return to rivers, maintain or rebuild stock abundance, or feed families. Over time, the depreciated return of salmon through removals like bycatch has led to the chum salmon crisis the Kuskokwim and Western and Interior Alaska region is in today.

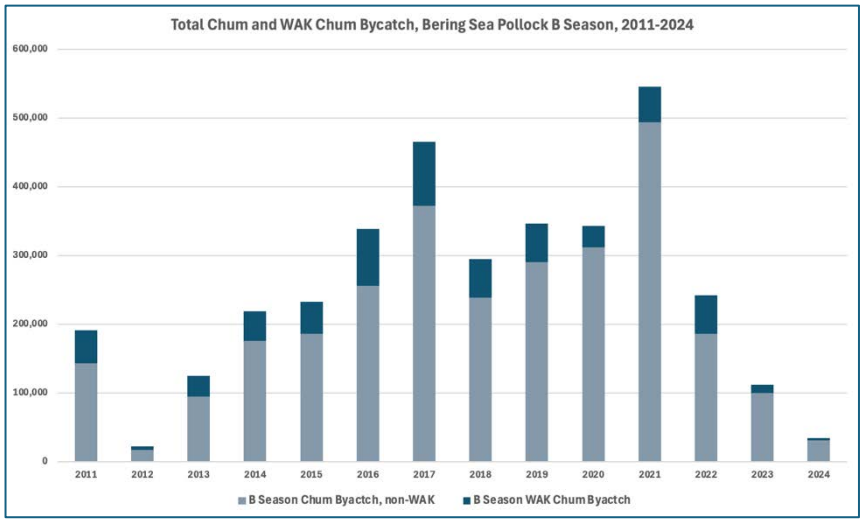


Figure 1: Non-WAK chum salmon bycatch (gray) and WAK chum bycatch (dark blue) resulting in total chum bycatch in the Bering Sea pollock fishery B Season, 2011-2024. Cumulative Western Alaska removals total over 615,000 chum salmon.

[1] KRITFC, 2025, "2023 Kuskokwim River Salmon Situation Report," available at https://www.kuskosalmon.org/s/2023-Kusko-Situation-Report_41924-final.pdf.

The DEIS clearly states in Chapter 6 that the action alternatives are not expected to hinder the Council's obligations to National Standard 1, nor the ability of Bering Sea groundfish fisheries to meet their annual catch limits. Recent years have shown that the pollock trawl fishery can keep their chum salmon bycatch below 100,000 chum salmon per year, and below historic and recent average bycatch levels, and still harvest their Total Annual Catch amounts when they effectively use their bycatch avoidance tools in their IPAs. And, to use these IPA tools well, the pollock trawl industry must be incentivized to meaningfully reduce chum salmon bycatch with a regulatory backstop—a cap—on the number of fish they can remove and waste each year. It is critical to note that, particularly in our unpredictable and volatile climate era, the existing tools and proposed additional provisions to the IPAs will fail to be effective at curbing chum salmon bycatch without a regulatory ceiling.

In other words: **Choosing KRITFC's recommended Preferred Alternatives will not cripple the pollock industry or processing communities linked to Bering Sea fisheries. Rather, this suite of Alternatives will institute meaningful, conservation-oriented incentives for chum salmon bycatch reduction. These incentives can help protect discrete spawning populations of chum salmon, reduce cumulative harm to stocks, and rebuild stock abundance.**

Moreover, in this way, KRITFC's recommended Preferred Alternatives will provide a net benefit to the nation by continuing the prosecution of Bering Sea groundfish fisheries—including the pollock trawl fishery—while participating in the active, gravel-to-gravel conservation of chum salmon to restore the food security, cultures and traditions, and subsistence economies of Alaskan salmon-dependent communities. We remind the Council that these communities are not just a regional interest group but are equally a part of this American nation, and they are directly connected to and dependent upon Alaskan fisheries.

In addition to the details provided in our comment to the Federal Register, KRITFC emphasizes the following points in our recommended Preferred Alternatives:

- We are strongly opposed to Alternative 1 to maintain status quo.
- We do not support linking PSC limits to in-river abundance as outlined in the alternatives.
- We have grave concerns with choosing any corridor option other than Option 1 of Alternative 5. Specifically, we urge that statistical area 655430 and all key stat areas for WAK chum salmon encounters be included in a targeted WAK chum in-season corridor, as this Alternative 5 intends to create; and this stat area is only included in Option 1, and KRITFC thus supports Option 1 (Figure 2).
- We request clarification and edits from the Council on several provisions of Alternative 4, including:
    - Provision 5: Who will determine how to make the weekly IPA bycatch reports "transparent" and "accessible," and to whom they will be delivered? KRITFC requests that our organization and Kuskokwim River Tribes be involved in this determination and delivery.
    - Provision 6: KRITFC cautions against the reliance on rates, rather than numbers of whole fish, to determine bycatch avoidance areas.

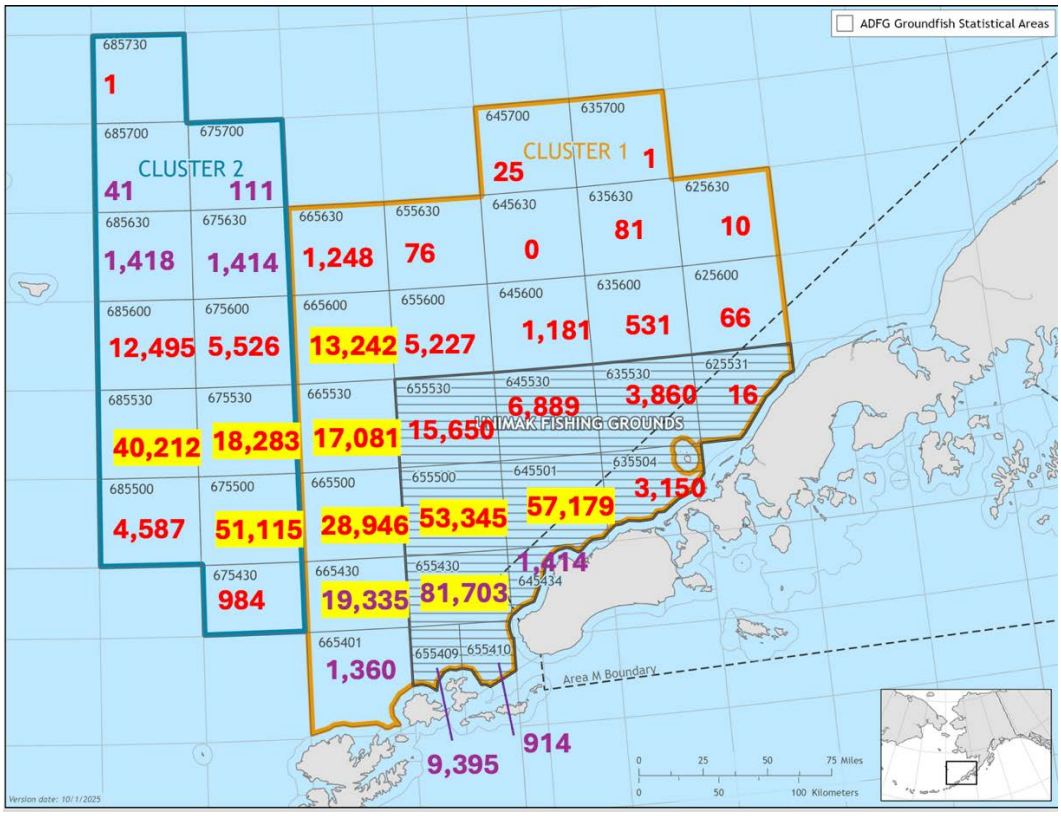


Figure 2: Cumulative WAK chum bycatch by stat area of genetic clusters 1 and 2, 2011-2023. Red text signifies inclusion in Alternative 5, Option 1. Purple text signifies exclusion in Alternative 5, Suboption 1. Highlighted values are the top ten stat areas with the largest removals. Note that both stat areas 655430 and 665430 are among the top ten highest WAK chum removals, yet would not be included in the corridor area outlined in Alterative 5, Suboption 1. Data come from DEIS Table A-2; map courtesy by J. Davies/Ocean Conservancy.

- We firmly urge against the adoption of Alternative 4 on its own. Alternative 4 must be coupled with a low, regulatory PSC limit to effectively and meaningfully reduce chum salmon bycatch.

Every fishery with impacts on WAK chum salmon sustainability must participate in the conservation and restoration of these stocks. **It is high time for the Council to act now to reduce the impacts of the Bering Sea pollock trawl fishery on chum salmon, because every salmon counts.**

Quyana, Dogidinh, Chin'an, Tsen'anh, Thank you,

Martin Andrew
Chair

Attachments:
1: KRITFC Chum Salmon Bycatch Draft Environmental Impact Statement Comment (Jan. 5, 2026)
2: KRITFC 2025 End-of-Season Summary (Nov. 2025)

KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION
OUR RIVER, OUR PEOPLE, OUR FISH
P.O. Box 190 Bethel, AK 99559-0190 | (907) 545-7388 | info@kritfc.org | kuskosalmon.org

January 5, 2026

Jon Kurland
Regional Administrator, Alaska Region
National Oceanic and Atmospheric Administration
P.O. Box 21668
Juneau, AK 99802-1668

RE: Chum Salmon Bycatch Draft Environmental Impact Statement – Recommendations

Dear Mr. Kurland:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) provides the following comments on the Draft Environmental Impact Statement (EIS) and Regulatory Impact Review for Chum Salmon Bycatch Management in the Bering Sea Pollock Fishery.

KRITFC is a Tribally-authorized 501(c)3 non-profit that seeks to uplift the interests of the 33 Federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, as guided by our Yup'ik and Dené knowledge and values and the best available Western science. Since October 2023, KRITFC has served as a cooperating agency in the development and review of this Draft EIS and its previous editions. In this role, we have contributed our expertise of Kuskokwim River chum salmon, including Traditional Knowledge (TK), to this analytical process.

Chum salmon are vitally important for Kuskokwim River people and ecosystems. They nourish families' physical and mental well-being, providing necessary nutrients and calories to survive the harsh environment in our region. They feed dog teams used for transportation, work, and recreation. They sustain cultural traditions and heritage, including languages and the art of filleting fish. They fortify the regional mixed subsistence-cash economy. They carry marine-derived nutrients to the ecosystem, proliferating the regional biodiversity of plants and animals that our subsistence-dependent communities rely on. More details on the key role chum salmon play to support holistic communal health and ecosystem services can be found in Section 4.4.3.2, "*Importance of Chum Salmon for Indigenous Peoples in the Yukon and Kuskokwim Regions*," and Appendix 8, "*Additional Information about Kuskokwim River Chum Salmon*," of the Draft EIS.

In 2020, chum salmon stocks in the Kuskokwim River and throughout Western and Interior Alaska began to decline dramatically from historic abundance. Since then, escapement goal attainment has failed in nearly every year and tributary, subsistence chum salmon fisheries have been severely restricted, and commercial chum salmon fisheries have been closed. KRITFC's

2025 End-of-Season Summary shows that Kuskokwim River chum salmon stock status still has yet to recover (see Attachment 1).

Bycatch is one of many anthropogenic and environmental factors contributing to chum salmon stock declines (see Draft EIS, Section 3.3.3.1.4, "*Environmental Factors Related to Western Alaska Chum Salmon Declines*," and Section 3.3.3.1.5, "*Traditional Knowledge of Chum Salmon Declines*"). Yet, as KRITFC has said before, it is one factor within the purview of NOAA Fisheries. As chum salmon are threatened by climate change, shifting food webs and prey competition, habitat degradation, and pollution, **managers must do all they can to take a precautionary, conservation-based approach to support salmon recovery.** As stated on page 429 of the Draft EIS, "each salmon that returns and successfully spawns may help rebuild populations and imbue climate resilience into the genetics of future chum salmon." Thus, the return of even a single chum salmon to Western and Interior Alaska rivers is a step towards long-term stock recovery.

To meet the Purpose and Need of this EIS "to minimize bycatch of Western Alaska origin chum salmon in the Eastern Bering Sea pollock fishery" (Draft EIS, page 57), KRITFC firmly recommends the final rulemaking selection of:

- **Alternative 5, Option 1, at a Prohibited Species Catch (PSC) limit of 50,000 chum salmon, with**
- **Alternative 2 at a PSC limit of 100,000 chum salmon, with**
- **Alternative 4 in its entirety.**

Our justification for this approach is as follows:

Alternative 5, Option 1: A Meaningful Inseason Chum Salmon Corridor

KRITFC supports the development of an inseason corridor that targets times and areas of chum and Western Alaska (WAK) chum salmon migration to meet the Purpose and Need of this EIS. Of the available alternatives, we believe this area is best encapsulated by Alternative 5, Option 1, which would close all 40 stat areas of genetic clusters 1 and 2—where WAK chum salmon bycatch in the Bering Sea pollock fishery is most concentrated. KRITFC recommends setting the PSC limit at 50,000 chum salmon, the lowest option on the table.

Alternative 5, Option 1 includes the largest area for an inseason corridor, representing a precautionary, conservation-based approach. According to the addendum to the preliminary Draft EIS of December 2024 (Table Ad-3), between 2011 and 2023, approximately 78% (473,567 chum salmon) of the cumulative B season WAK chum salmon bycatch of 610,932 WAK chum salmon occurred in genetic clusters 1 and 2. According to the addendum to the current Draft EIS (Tables A-1 and A-2), of the 40 stat areas in this area, the 10 stat areas with the most annual WAK chum salmon bycatch on average (and in order or most to least) during the corridor period (June 10 to August 31) are 655430, 675500, 645501, 655500, 685530, 665500, 675530, 665430, 665530, and 665600. **Between 2011 and 2023, 380,441 WAK chum salmon were cumulatively removed as bycatch in those 10 stat areas alone, or 83% of the cumulative WAK chum salmon bycatch between June 10 and August 31 in the Option 1 corridor.**

However, under Suboption 1, two of the stat areas in that top 10 list—655430 (#1) and 665430 (#8)—would be exempt from the corridor cap, meaning the pollock fleet would be able to fish in these areas without a limit despite their historic contribution to WAK chum salmon bycatch. **Additionally, under Option 2, the pollock industry would be granted the choice to set the corridor in 19 to 29 of any of the 40 stat areas, and fluctuate it year-to-year as they see fit.** KRITFC does not anticipate the pollock industry would choose stat areas in the interest of protecting WAK chum salmon, but instead, would act in the interest of protecting its profits. Between 2011 and 2023, pollock was harvested in stat area 655430 every year, and in stat area 665430 in all but one year (2011). The analysis indicates that "it is expected the IPAs [Incentive Plan Agreements] would look to leave open stat areas with high pollock CPUE" (page 229). Thus, it is likely that the pollock industry would exempt these stat areas from their self-selected corridor under Option 1, despite the data showing they are critical for WAK chum salmon migration.

A further issue with Option 2 is that it requires the pollock industry to choose the inseason corridor stat areas preseason, meaning the industry would need to rely on "imperfect information" to annually pre-select their corridor (Draft EIS, page 230). Moreover, there is currently no weighting system to which source of data—chum salmon PSC, pollock CPUE, and genetics data—would be the primary motivator. This makes it difficult to trust that the industry would include stat areas with historically high amounts of chum and WAK chum salmon bycatch in its corridor, especially if those same stat areas historically have had high pollock harvest levels.

Creating an inseason corridor with any fewer than 40 stat areas, with stat areas 655430 and 665430 exempted (Suboption 1), and/or by the self-selection of the pollock industry (Option 2) is therefore unacceptable.

KRITFC notes that it is critical to look at ***numbers*** of chum salmon bycatch by stat area, and not ***rates***, to decipher which stat areas are critical for WAK chum salmon passage. Relying solely on chum bycatch rates obscures stat areas which have high total numbers of chum salmon removals, but which also have high amounts of pollock catch. Stat area 655430 is a prime case in point. As just discussed, this stat area has the highest cumulative WAK chum salmon bycatch from 2011-2023, clocking in a cumulative 81,703 WAK chum salmon, or approximately 18% of the WAK chum bycatch from the 40-stat area corridor time and area. **In other words, nearly one-fifth of the WAK chum salmon bycatch from the entire corridor area between 2011 and 2023 occurred solely in stat area 655430. However, because stat area 655430 is also a high pollock producer, it has one of the lowest rates of WAK chum salmon PSC in this same time period (reformatted Figure 3-36).** Rates are therefore unreliable metrics compared to whole numbers when seeking to protect WAK chum salmon, as stated in the Purpose and Need of this action.

Additionally, KRITFC recommends the inclusion of the 10 State waters stat areas identified in Appendix 2 of the Draft EIS to prevent the unintended, potential consequence of catching additional chum salmon PSC if vessels move to these stat areas once closed out of, or to avoid being closed out of, the 40 corridor stat areas.

KRITFC supports an inseason corridor cap of 50,000 chum salmon. This is the lowest cap option on the table for this alternative, and thus is the closest to meeting our Tribes' years-old pleas for 0 chum salmon bycatch. Moreover, a lower, more-constraining cap is necessary to drive the pollock industry's behavior change to reduce chum salmon bycatch, if that is the true goal of this action.

KRITFC does not support Alternative 5, Option 3 because linking an inseason corridor cap to Yukon River chum salmon abundance is reactive, rather than proactive; it excludes Kuskokwim stock status; and it would mean this critical inseason corridor could be "turned off" in some years.

Additionally, KRITFC does not support Alternative 5, Option 4, to delay the start of the Winter Herring Savings Area. The pollock industry continually pits prohibited catch species, like chum salmon, Chinook salmon, and herring against one another, spending critical resources and decision-maker time weighing the value of these species when, instead, they could be seeking innovative fishing techniques to avoid all of them. KRITFC disagrees that the pollock trawl industry needs more flexibility to achieve their Total Allowable Catch (TAC), and thus does not recommend the adoption of Option 4.

Alternative 2: Annual Bering Sea-Wide Cap

KRITFC supports a PSC limit in effect each year across all vessels, sectors, and stat areas of the Bering Sea. KRITFC supports setting this PSC limit at 100,000 chum salmon, the lowest option on the table.

Setting a Bering Sea-wide PSC limit will function as a backstop cap to curb chum salmon bycatch and protect WAK chum salmon outside of the inseason corridor that we recommend adopting under Alternative 5, Option 1. This backstop and salmon protection is two-fold: First, any trawling occurring outside the corridor stat areas will still be subject to a cap. This is important for WAK chum salmon conservation because approximately 20% of the annual (A+B season) WAK chum salmon bycatch occurs outside of the 40 stat areas being considered for an inseason corridor under Alternative 5 (see Draft EIS, Table 3-57, page 216). Secondly, if the inseason corridor cap is met and the corridor closes, pushing vessels to fish outside of the corridor before September 1, they will still be subject to a limit on the number of chum salmon bycatch that can be removed. Table 3-57 of the Draft EIS shows that nearly 40% of the annual WAK chum salmon occurs *outside of* the proposed inseason corridor time (June 10–August 31) and area. Thus, areas of the Bering Sea outside of the proposed inseason corridor are used by WAK chum salmon for rearing, and leaving them open for trawling without a limit risks salmon conservation.

If the true intention of this action is to reduce WAK chum salmon across the Bering Sea pollock trawl fishery throughout the B season (June 10 to November 1), a backstop cap across the entire Bering Sea is necessary. And, similarly to KRITFC's rationale for supporting the lowest PSC limit value in Alternative 5, Option 1, we support the lowest PSC limit value of 100,000 chum salmon under Alternative 2 to strive to meet Tribal requests and to meaningfully drive the industry's behavior change.

KRITFC supports a Bering Sea-wide cap in place each year in order to be proactive in salmon conservation by preventing accruals of chum salmon removals year-to-year. We thus recommend Alternative 2 over Alternative 3, as the latter may be turned off by "high" chum salmon abundance in one or more rivers of Western and Interior Alaska. This off/on abundance-linked approach would inconsistently and retroactively protect WAK chum salmon and prevent high chum salmon bycatch.

KRITFC does not support the CDQ Reserve Pool option because it creates the possibility for additional chum salmon bycatch allowances. Every salmon counts to restore abundant stocks, and even a relatively small buffer of additional PSC risks stock recovery. Moreover, the analysis makes clear that it is uncertain, and even unlikely, that this Reserve Pool will be used by CDQ groups, because they historically have and still fish with the Catcher-Processors more than any other sector and because they would need to notify the National Marine Fisheries Service (NMFS) by November 15 of the prior year before accessing this buffer (Draft EIS, page 87). This option thus seems unnecessary and antithetical to the Purpose and Need of this action.

Alternative 4: Codifying Industry Practices

KRITFC supports the adoption of Alternative 4 in its entirety to the Code of Federal Regulations *in combination with PSC-based alternatives*. This would add six additional provisions to the regulations the pollock industry is required to follow under the IPAs, including (1) utilizing genetic information to avoid WAK chum salmon, (2) evaluating salmon closures more than once each week, (3) using salmon excluder devices through the B season, (5) providing bycatch reports transparently to Western and Interior Alaska salmon users, and (6) prohibiting fishing in areas with high chum salmon bycatch rates.

The analysis notes that, because the six provisions under consideration in Alternative 4 have become standard industry practices since 2022, they are unlikely to incur additional costs to the industry (see Draft EIS Section 4.3.4, "Alternative 4," page 357). Moreover, these practices may have helped reduce chum salmon bycatch since the 2021 second-all-time-high chum salmon bycatch.

KRITFC nonetheless has some reservations about the implementation of these provisions, if adopted into regulation. For instance, under Provision 5, it is unclear how weekly bycatch reporting will be made available and more transparent to Western and Interior Alaska salmon users—and who determines the terms for "transparent" and "accessible" reporting (see Draft EIS page 211). In another example, Provision 6 outlines the use of chum bycatch:pollock catch rates to determine avoidance areas—but we have previously discussed in this letter the shortcomings of relying on rates, rather than whole numbers, of chum salmon bycatch to protect salmon. KRITFC urges clarification on the interpretation, implementation, and enforcement of these provisions for Tribes, industry, the public, and decision-makers.

Despite these reservations, KRITFC supports the adoption of Alternative 4 alongside PSC-based alternatives.

Importance of the Alternative 2 + 4 + 5, Option 1, Combination Approach

KRITFC firmly urges the adoption of Alternatives 2, 4, and 5, Option 1, in combination with one another as a holistic package. These three action alternatives must be adopted together to meet the Purpose and Need to reduce WAK chum salmon bycatch.

The Draft EIS clearly says that coupling Alternative 2 and 5 at their lowest cap options (100,000 and 50,000 chum salmon, respectively) will be the most beneficial for chum salmon conservation by incentivizing the most chum salmon bycatch reductions (see Draft EIS Section 3.3.4.7, "*Combined Effects of Alternatives of Chum and Western Alaska Chum Salmon*"). Fewer chum salmon removed as bycatch through these alternatives is one critical step to restoring chum salmon abundance, which "could provide more harvest opportunities, a higher likelihood of attaining harvest goals, support for Tribal food sovereignty and security, restoring human-salmon-ecosystem relationships for many across Western and Interior Alaska," including in the Kuskokwim region (Draft EIS, page 425).

Furthermore, and critically, **the Draft EIS clearly indicates that none of the action alternatives are expected to jeopardize the attainment of the National Standards,** including National Standard 1, to achieve the optimum yield (OY) of the Bering Sea groundfish fisheries, of which the B season pollock TAC is a part. Specifically, the analysis states that:

> "While it is hypothetically possible that the proposed action could interfere with the achievement of OY on a continuing basis, *it is not expected to*… Even with an early end to B season fishing, based on historical analysis, *it is extremely unlikely* that the overall groundfish harvest would fall outside the BSAI OY range of 1.4 million to 2.0 million mt in any one year and even less likely to occur on a continuing basis" (Draft EIS Section 6.1, "Consideration of Magnuson Stevens Act National Standards," page 454; emphasis added).

This underscores that this combination approach not only would produce the most chum salmon savings, but will not hinder the obligations of the North Pacific Fishery Management Council to meet the National Standards, nor the goals of the pollock industry to achieve its TAC.

Furthermore, KRITFC strongly urges against the assumption that adopting Alternative 4 without combining it with a PSC limit will be effective. History shows that industry will not work to keep chum salmon bycatch low without being incentivized to stay under a PSC limit. The six provisions proposed to be made regulatory under Alternative 4 have been tools in the industry's toolbox for over 15 years, since the adoption of Amendment 91 in 2011. Yet, instead of employing these tools to minimize chum salmon bycatch, as required under National Standard 9, industry let them gather dust while chum salmon bycatch steadily increased from 2012 to 2021 (see Figure 1-1, Draft EIS page 21).

The 2021 season was a turning point. With renewed public scrutiny on chum salmon bycatch and pressure from Tribes, including from the Kuskokwim, and the public to put a regulatory cap on the pollock fishery, the industry put on its best behavior and reduced chum salmon. **In other words, the pollock industry could have been maintaining a low chum salmon bycatch for over a decade, with tools already in their toolbox, but they did not until consideration of a PSC limit loomed at the North Pacific Fishery Management Council—and in the**

meantime, since 2011, the industry has removed at least 615,000 WAK chum salmon as bycatch. What, then, can guarantee that selecting Alternative 4 as a standalone proposal will incentivize the pollock trawl industry to maintain low chum salmon bycatch levels?

The data are clear that a cap is needed to make the provisions in Alternative 4 effective. KRITFC thus supports the regulatory adoption of Alternative 4 in combination with the lowest possible PSC limits under Alternatives 2 and 5, Option 1. Only this combination of alternatives is likely to meaningfully drive the industry's behavior, respond to Tribal asks, and protect WAK chum salmon.

Edits Needed for Final EIS

In addition to our recommendation and rationale, KRITFC also flag the following errors in the Draft EIS that should be corrected for publication of the Final EIS. Suggested edits are bolded and underlined.

- *Page 64:* "Kuskokwim River Intertribal Fish Commission" should be corrected to "Kuskokwim River **Inter-Tribal** Fish Commission."

- *Page 65:* Per KRITFC staff notes from this consultation, "ORC" should be corrected to "**ONC**," for the Orutsararmiut Traditional Native Council.

- *Page 67:* KRITFC has authorizations from 28 Federally recognized Tribes, and thus our representation should be corrected from 25 to **28**.

- *Page 240:* KRITFC only co-manages salmon fisheries in federal waters of the Kuskokwim, not throughout the state. We recommend changing this sentence to, "…and within Federal waters in Alaska USFWS **manages rural subsistence salmon fisheries, and co-manages rural subsistence salmon fisheries with KRITFC in Federal waters of the Kuskokwim River.**"

- *Page 411:* Key data from the Western Alaska Salmon Stock Identification Program (WASSIP) and 2022 Area M genetic analysis to understand the impacts of Area M chum salmon harvest on WAK chum salmon are obscured. The South Alaska Peninsula June fishery is the fishery with critical interception of WAK chum salmon (which includes both CWAK and Upper Yukon stock reporting groups). Thus, KRITFC recommends editing the analysis of the WASSIP and 2022 study data to focus in on the June period of the South Alaska Peninsula fishery, as follows:

  > From 2007-2009, approximately **51 to 61% of the chum salmon harvested in the South Alaska Peninsula June fishery** were of CWAK **and Upper Yukon origin*** (**Tables 122-124 in** Munro et al. 2012). More recently, a preliminary study estimated the harvest rates for Western Alaska and Alaska Peninsula stocks for the 2022 Area M fisheries and found the relative proportion of CWAK **and Upper Yukon** stocks was substantially lower than WASSIP years at **18%** and **97,508** chum salmon harvested (**Table 15** in Dann et al. 2023).

***Footnote to add: The South Alaska Peninsula June fishery area is concentrated in the migratory pathway of WAK chum salmon, and thus its genetic compositions during the WASSIP studies are noted here as the Area M fishery with the highest impact to WAK fish.**

- *Pages 35, 131, and 423-424:* The analysis consistently compares the chum salmon bycatch reductions since 2021 through the practice of the Alternative 4 provisions to just the 2021 chum salmon bycatch level (545,901). However, to meaningfully evaluate how the Alternative 4 provisions reduce chum salmon bycatch, the analysis should evaluate how close the bycatch since the adoption of these provisions in 2022 has come to the time-period average of ~268,000 chum salmon—not to a single year that had the near all-time-high chum salmon bycatch.

These values should be corrected as follows:

Year	Chum salmon bycatch	Bycatch reduction compared to 2021 bycatch (545,901)	Bycatch reduction compared to 2011-2023 average (~268,000)
2022	242,309	55%	10% below average
2023	111,852	80%	58% below average
2024	35,125	94%	87% below average

- *Pages 428 and 431:* Per our cooperating agency letter with NMFS, dated November 15, 2023, KRITFC has endeavored to provide information based on our "special expertise regarding the life cycles (including freshwater and marine stages), management, and subsistence use of Kuskokwim River chum salmon and their environmental, economic, and social importance to the Kuskokwim region." However, the Draft EIS downgrades this expertise to KRITFC's "perspective." KRITFC suggests substituting "perspective" with "expertise" to more accurately capture the intent of our cooperating agency partnership with NMFS.

Concluding Remarks

KRITFC appreciates your attention to these comments, and we expect NMFS to consider them closely per its government-to-government relationship and trust obligations to our Tribal Nations. We look forward to consulting you further on this matter and sharing our stance with the North Pacific Fishery Management Council in the coming weeks.

Respectfully submitted,

Martin Andrew
Chair

Kevin Whitworth
Executive Director

KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION

KUSKOKWIM RIVER END-OF-SEASON SUMMARY 2025

TRIBES OF THE KUSKOKWIM REGION ARE FACING A HUMANITARIAN AND ECOLOGICAL CRISIS BECAUSE OF CONTINUED MULTI-YEAR, MULTI-SPECIES SALMON DISASTERS THAT THREATEN THE FOOD SECURITY, CULTURAL INTEGRITY, ECOSYSTEMS, AND WELL-BEING OF OUR SUBSISTENCE DEPENDENT COMMUNITIES.

AT A GLANCE

KRITFC is doing all we can to recover and rebuild Kuskokwim River Chinook, chum, and coho salmon stocks for current and future generations.

- For the tenth consecutive year, the U.S. Fish and Wildlife Service and KRITFC formally co-managed salmon harvests in federal waters of the lower Kuskokwim River, providing for conservation and subsistence fishing.
- This is the 12th consecutive year where federal management or Tribal-federal co-management actions resulted in meeting the drainage-wide Chinook escapement goal range.
- In 2025, and in 11 of the past 12 years, in an effort to rebuild the populations, Chinook salmon escapements were at the upper end of the escapement goal range.
- Sonar and weir information show that Chinook and chum salmon returns on the Kuskokwim River remain alarmingly declined, and stocks are far from recovered.
- Sustained declines make it impossible to provide sufficient Chinook and chum fishing opportunities to meet long-term historical subsistence needs.
- Sonar and weir data also indicate that the 2025 coho salmon returns were still below long-term historical levels.

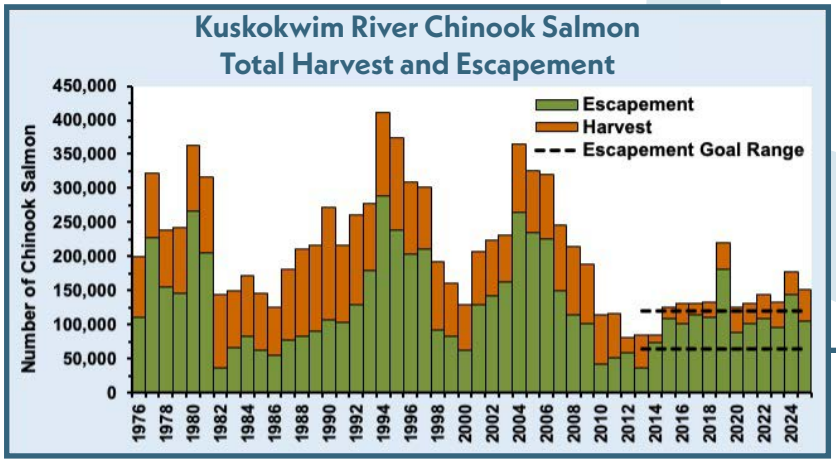
In contrast, the State of Alaska Board of Fisheries (BOF) and North Pacific Fisheries Management Council (NPFMC) continue to allow commercial fisheries in the ocean to take salmon bound for the Kuskokwim.

- We cannot directly control the impact of climate change on our salmon populations, but the State of Alaska and NPFMC do have direct control over the commercial fishing impacts to our salmon in the ocean.
- Despite catastrophic declines of Western Alaska salmon, the policy of the State and the NPFMC is to prioritize commercial use above escapement and subsistence.
- The cumulative removals of Western Alaska Chinook and chum salmon by commercial fisheries in Area M and the Bering Sea remain the number one threat to salmon under human control.

2025 CHINOOK SALMON STATUS

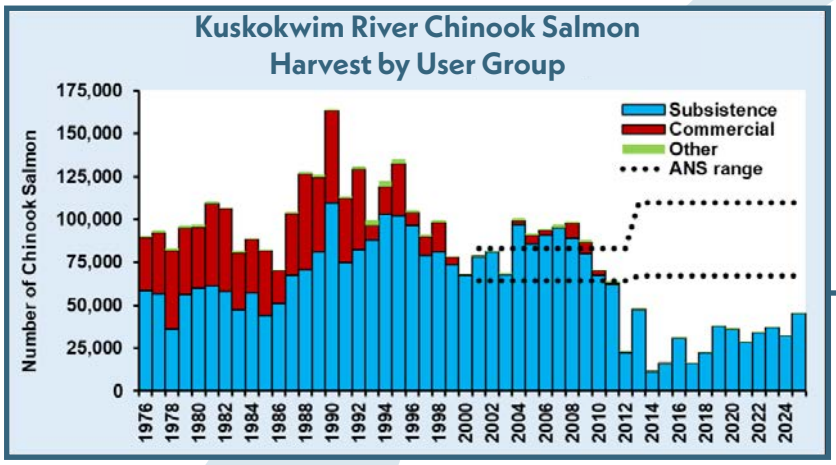
The preliminary estimate for the 2025 Chinook salmon total run size is about 151,000 fish, with an estimated escapement of nearly 105,800 Chinook salmon and river-wide harvest of about 45,600 fish. The 2025 Chinook salmon run began early, with harvests in the headwaters in early June. At first, the run seemed strong, with relatively high passage at the Kuskokwim sonar and harvests by lower Kuskokwim fishers. However, the run plateaued around the 50% passage mark, and end-of-season counts at the Kuskokwim sonar and at several weir sites were below long-term averages. **Kuskokwim River Chinook salmon thus continue to be in a state of decline.** Nonetheless, harvesters reported higher catches of Chinook salmon, and bigger and healthier fish, than in recent years. KRITFC celebrates fuller smokehouses alongside our fishing families.

2025 marks the 12th consecutive year of federal management (and the tenth of Tribal-federal co-management) of Kuskokwim River Chinook salmon within federal waters. As a result of precautionary management and immense sacrifices by subsistence users during this period, this is also the **12th successive year of achieving Chinook salmon spawner abundance within or above the drainage-wide escapement goal range.**



Kuskokwim River Chinook salmon harvests and total return, 1976-2025. The preliminary 2025 total return was 27% less than the average for 1976-2024.

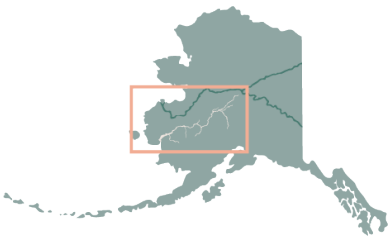
As a result of sacrifices by subsistence harvesters, the drainage-wide escapement goal for Chinook salmon was met for the 12th year in a row, helping to rebuild these stocks.



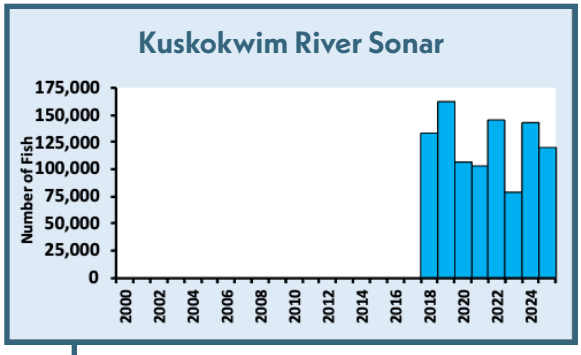
Kuskokwim River Chinook salmon harvest, 1976-2025. The preliminary 2025 subsistence harvest was a 57% decline from the average for 1976-2010.

In order to meet escapement goals, "Amounts Reasonably Necessary for Subsistence" (ANS) have not been met since 2010.

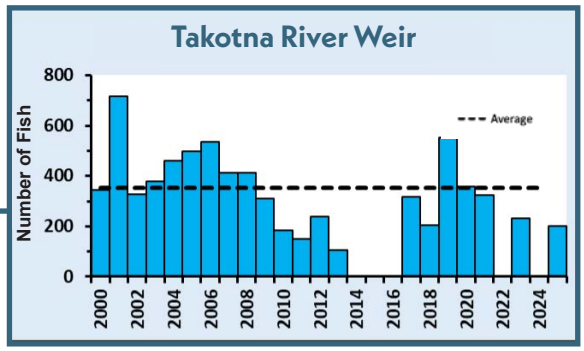
2025 CHINOOK SALMON STATUS



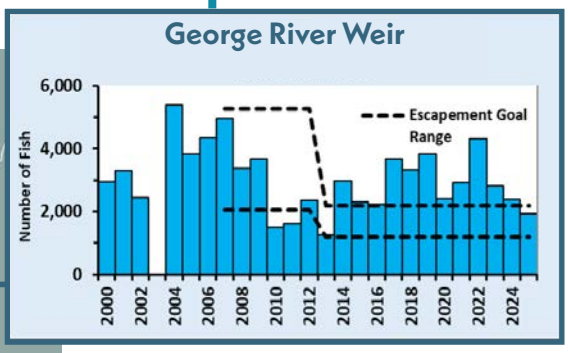
Alarmingly, Chinook salmon trends at the Kuskokwim sonar, weirs, and test fishery remain below historical abundance.



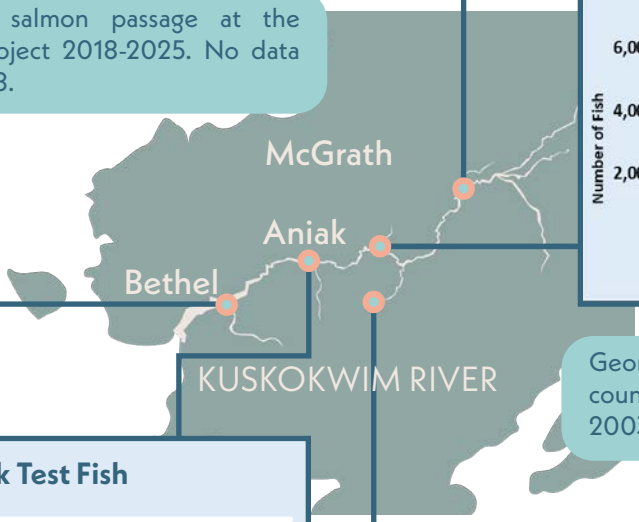
Estimated Chinook salmon passage at the Kuskokwim sonar project 2018-2025. No data available prior to 2018.

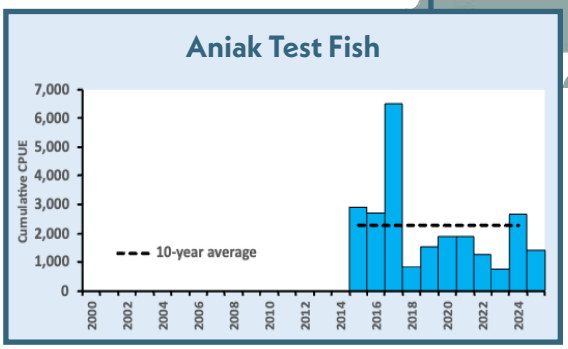


Takotna River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2014-2016, 2022, or 2024.

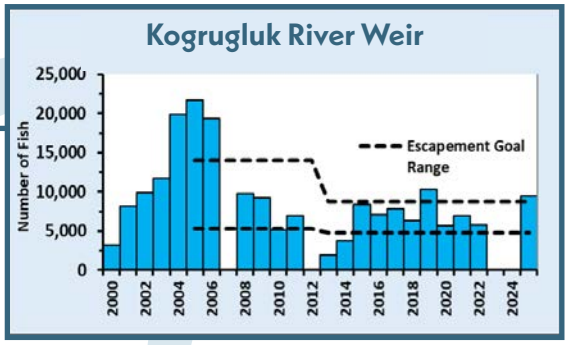


George River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2003.





Aniak test fishery estimated Chinook counts, 2015-2025. No data available prior to 2015.

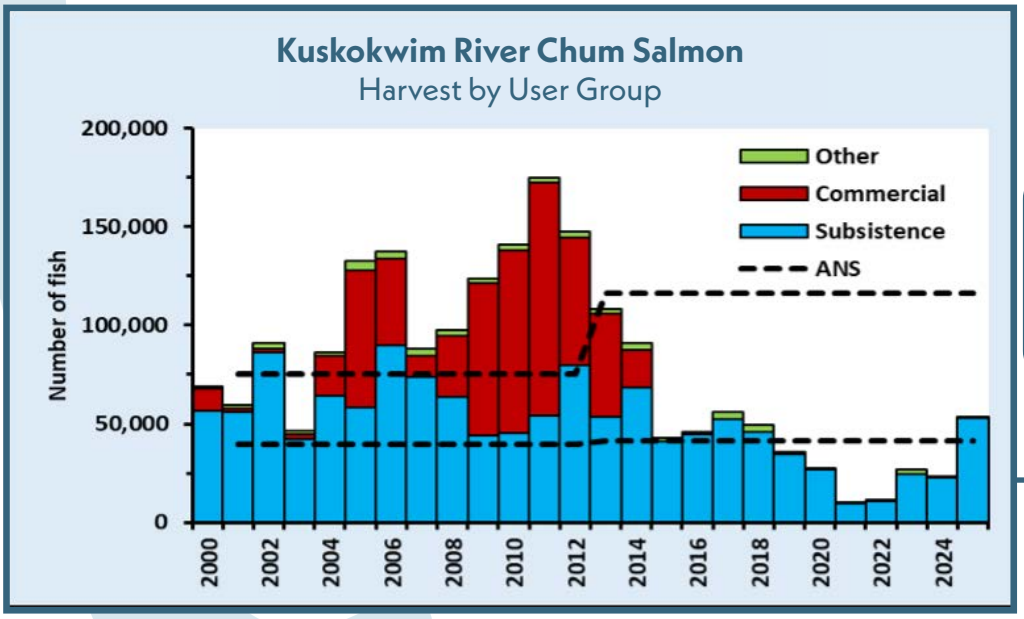


Kogrukluk River weir estimated Chinook salmon counts, 2000-2025. No estimate available for 2007, 2012, 2023, or 2024.

2025 CHUM SALMON STATUS

Kuskokwim River chum salmon populations continue to be depressed, showing minimal signs of recovery. The 2025 chum salmon run shares a similar story to Chinook salmon. Chum salmon migration began early and seemed strong at the outset. However, by the middle of the run, passage had tapered. At the end of operations on August 24, chum salmon passage at the Kuskokwim River sonar was about 158,100 fish—33% below the 2018-2024 average, and 66% below the pre-2020 collapse average.

The preliminary lower Kuskokwim subsistence harvest estimate for chum salmon, produced with community-based harvest monitoring data compiled by KRITFC, is a minimum of 21,500 fish. Although higher than 2021-2024 harvests, this is well below long-term chum salmon harvests due to fishing restrictions and low chum salmon abundance. Future updated estimates based on ADF&G post-season household surveys may suggest the lower bound of ANS (41,200–116,400 chum salmon) was approached or met in 2025. Fishers across the Kuskokwim reported that they harvested fewer chum salmon than expected. However, most noted that the chum salmon they did catch were good-sized and healthy, which hopefully indicates some recovery of the species to come.

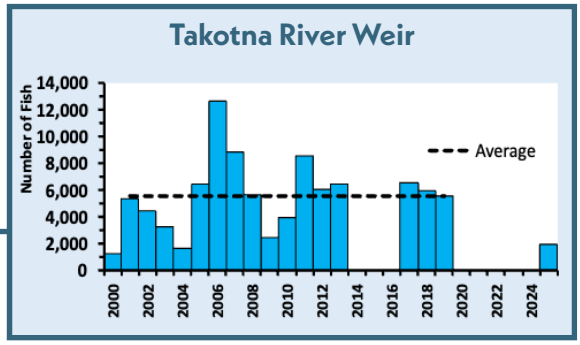


ANS were not met from 2019-2024. While complete 2025 data are not yet available, it is possible, but uncertain, that the low-end of the ANS range was met in 2025.

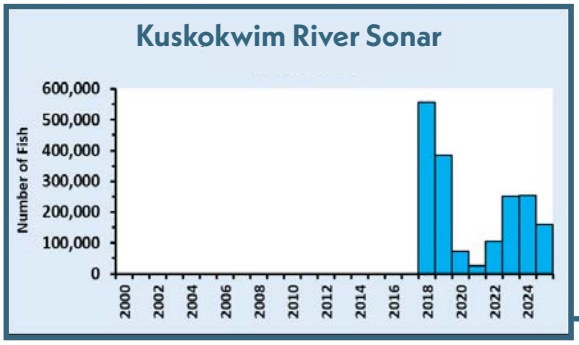
Due to the ongoing severe chum salmon crash and the need for conservation, the average subsistence harvest during 2020–2024 was 68% less than the 2000–2018 average. 2025 chum salmon harvest estimates are preliminary projections based on in-season and historical harvest data.

2025 CHUM SALMON STATUS

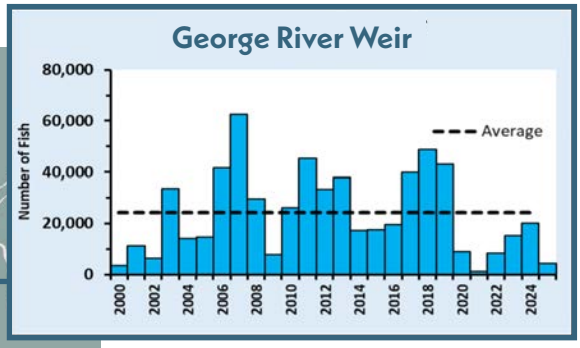
Chum salmon trends at the Kuskokwim sonar and weirs remain well-below average, indicating stocks are far from full recovery.



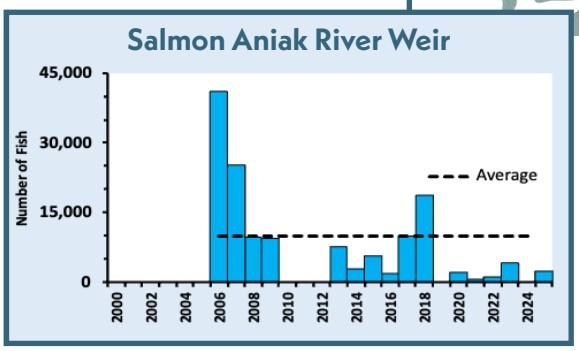
Chum salmon passage at the Takotna River weir, 2000-2025. No estimate available for 2014-2016 or 2020-2024.



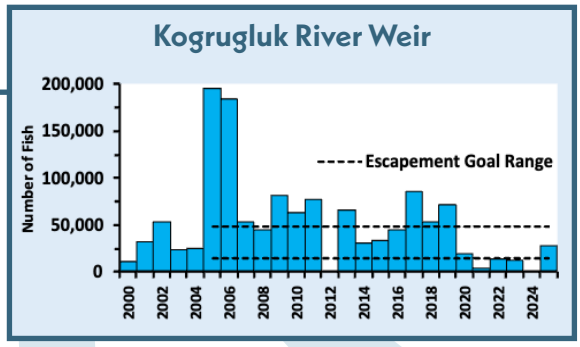
Chum salmon passage at the Kuskokwim sonar, 2018-2025. No data available prior to 2018.



Chum salmon passage at the George River weir, 2000-2025.



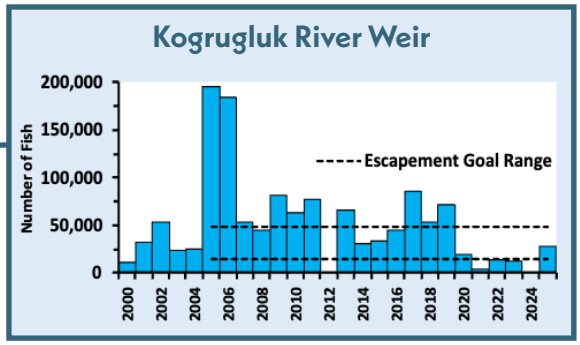
Chum salmon passage at the Salmon-Aniak River weir, 2000-2025. No estimate available for 2010-2012, 2019, 2024, or prior to 2006.



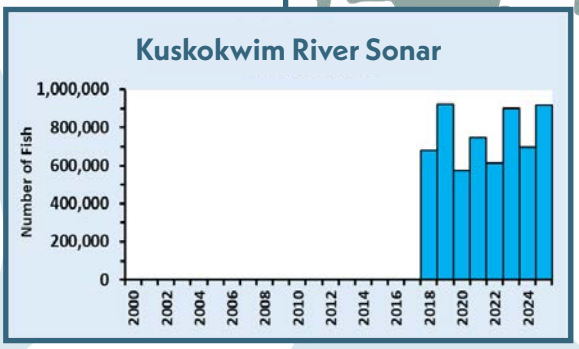
Chum salmon escapement at the Kogrukluk River weir, 2000-2022. No estimate available for 2012 or 2024. The 2025 escapement was 53% below the 2000–2021 average.

2025 SOCKEYE SALMON STATUS

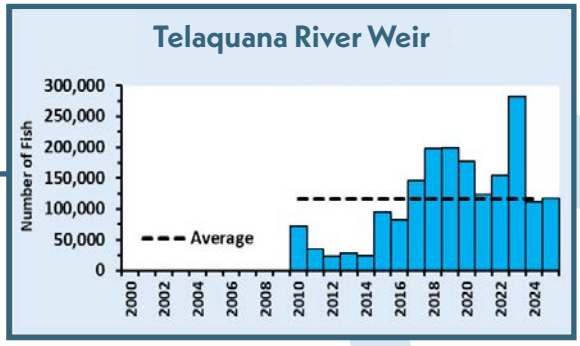
The 2025 Kuskokwim River sockeye salmon run was again very large compared to those of other salmon species. Sockeye salmon passage counted by the Kuskokwim sonar **totaled about 920,600 fish.**



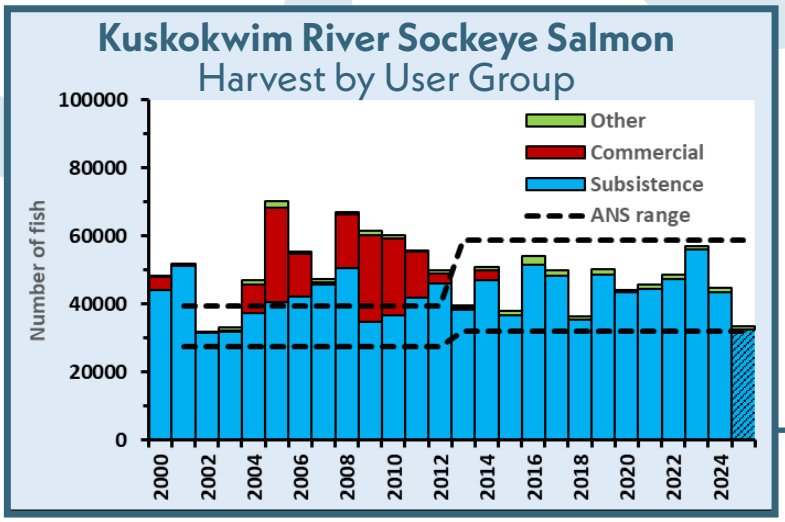
Sockeye salmon passage at the Kogrugluk River weir, 2000-2025. No estimate available for 2012 or 2024.



Sockeye salmon passage at the Kuskokwim River sonar, 2018–2024. No data available prior to 2018.



Sockeye salmon escapement at the Telaquana River weir, 2010–2025. No data available prior to 2010.



Sockeye salmon harvest by Kuskokwim River user group, 2000–2025. ANS has been met since 2001.

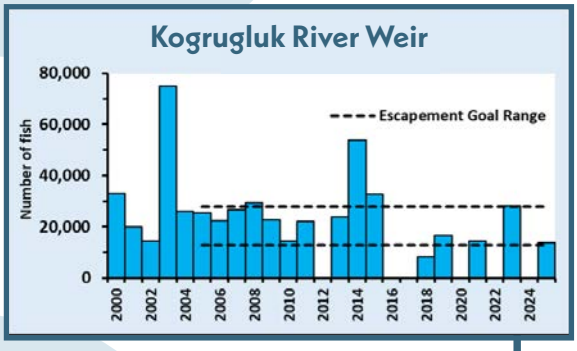
Sockeye salmon harvest by user group, 2000-2025. Commercial harvests since 2016 are confidential and not shown, but are a small portion of the total harvest. 2025 sockeye salmon harvest estimates are preliminary and show only in-season harvest estimates from the lower Kuskokwim, which should be considered a minimum estimate.

2025 COHO SALMON STATUS

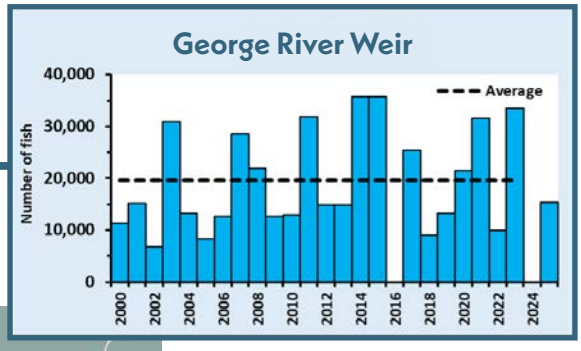
The 2025 Kuskokwim coho salmon run was above the recent 5-year average, but compared to long-term coho salmon abundance on the Kuskokwim, the 2025 run was weak.

While the **Kuskokwim sonar passage of about 392,200 coho salmon** seemed well-above the recent 2020-2023 average of about 227,900 fish, returns in 2020, 2021, and especially 2022 were among the lowest on record according to both the sonar and Bethel Test Fishery projects. This skews the average low. Moreover, an added a fourth sonar unit more completely covered the span of the river to provide this year's passage estimate. However, a three-sonar count from 2025 is more directly comparable to the recent average, and this count was about 292,400 coho salmon—100,000 fish fewer than the four-sonar count, and only slightly above the 2020–2023 average.

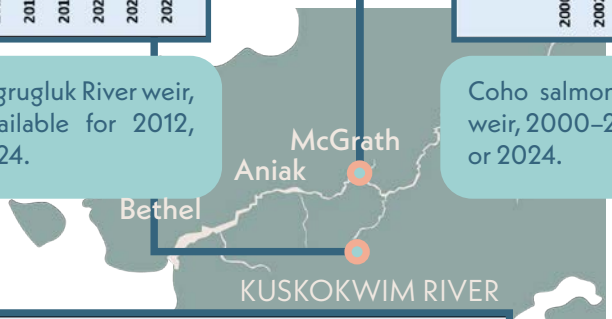
A minimum of 1,900 coho salmon were estimated to have been harvested for subsistence in the lower Kuskokwim before Federal-Tribal management ended on August 7; it is assumed that more subsistence (and commercial) harvests occurred after this point. It is unclear whether the ANS (27,400–57,600) will be met in 2025.

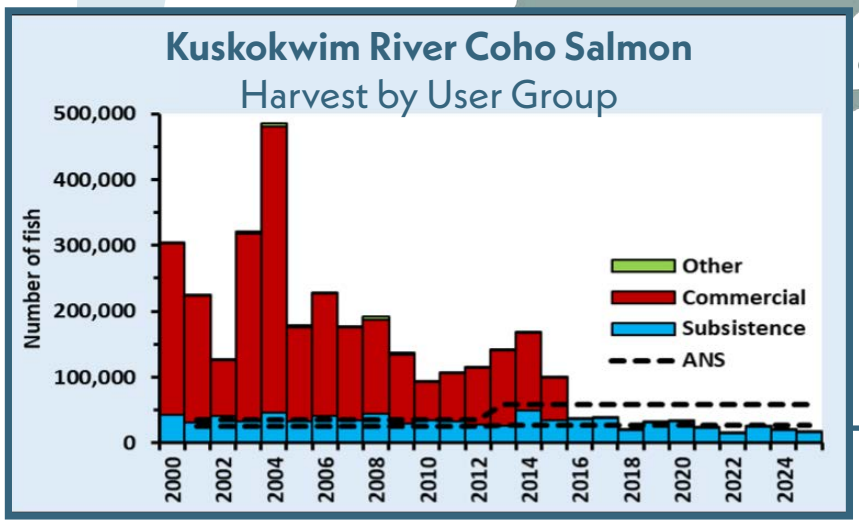


Coho salmon passage at the Kogrugluk River weir, 2000-2025. No estimate available for 2012, 2016, 2017, 2020, 2022, or 2024.



Coho salmon escapement at the George River weir, 2000–2025. No estimate available for 2016 or 2024.





Coho salmon harvest by Kuskokwim River user group, 2000–2025. Commercial harvests since 2016 are confidential and not shown but are a small portion of the total harvest. 2025 coho salmon harvest estimates are preliminary projections based on in-season and historical harvest data.

The Kuskokwim River ANS was not met in 2013, 2018, or 2021-2024.

2025 MARINE BYCATCH & COMMERCIAL HARVEST

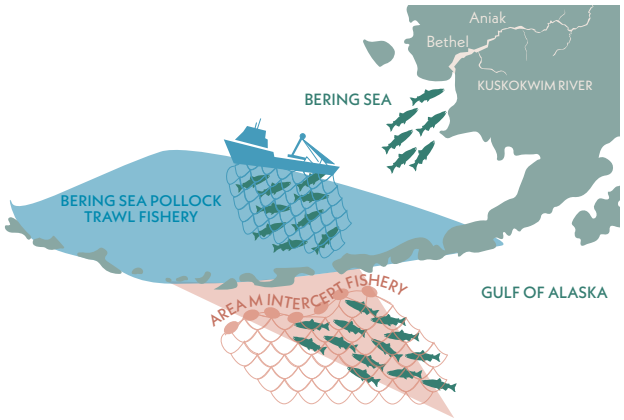
BERING SEA

2025 POLLOCK FISHERY BYCATCH

CHINOOK
19,319

CHUM
139,049

As of September 25, 2025 (includes coastal Western AK, Asian, and other stocks).



AREA M

2025 COMMERCIAL HARVEST

CHINOOK
13,587

CHUM
165,028

Chinook salmon landings as of September 4, and chum as of June 30, 2025 (includes coastal Western AK, Asian, and other stocks).

BERING SEA POLLOCK BYCATCH IMPACTS

- Since 2011, Bering Sea pollock trawl fisheries have wasted over 246,000 Chinook salmon and 3.5 million chum salmon caught as bycatch.
- On average, 50% of all Chinook salmon bycatch and 20% of all chum salmon bycatch by Bering Sea trawl fisheries are fish from Western and Interior Alaska rivers, including the Kuskokwim.
- Additionally, the pollock fleet trawls on the ocean floor 40-90% of the time, destroying essential fish habitat.
- Despite continued steep salmon declines, NPFMC and NOAA Fisheries increased the Total Allowable Catch of pollock in 2025.
- The State of Alaska's appointees and industrial trawl interests dominate the membership of the NPFMC. As a result, the NPFMC vigorously resists taking meaningful action to curb trawl impacts to salmon and salmon habitat.

AREA M SALMON COMMERCIAL HARVEST IMPACTS

- Since 2011, Area M June fisheries have harvested and sold over 97,900 Chinook salmon and 6.8 million chum salmon.
- Available genetic data show about 20% of Chinook salmon harvests in Area M, and about 20-30% of chum salmon harvests in recent years, are from Western and Interior Alaska rivers, including the Kuskokwim.
- While rivers across Alaska face Chinook salmon collapses, the Area M fishery is the only commercial fishery in the North Pacific allowed to catch and sell an unlimited number of Chinook salmon.
- The Alaska Board of Fisheries and Department of Fish & Game manage the Area M June fishery as an independent region, even though it is an intercept fishery. This means nearly all salmon landed in Area M are from outside of the Alaska Peninsula region – and many, like Kuskokwim Chinook and chum stocks, are in crisis.

ACKNOWLEDGEMENTS

We gratefully acknowledge the hard work of the following individuals who made fisheries management and monitoring on the Kuskokwim River successful in 2025:

KRITFC In-Season Managers: Betty Magnuson (Upper River), Tracy Simeon (Middle River), Mike Williams Sr. (Lower River) , Henry Hunter Sr. (Bethel Area), Paul Cleveland (Tundra/Coast), Jonathan Samuelson (Upper River alternate), Walter Morgan (Middle River alternate), Martin Andrew (Lower River alternate), Ralph Nelson (Bethel Area alternate), Noah Wise (Tundra/Coast alternate), James Nicori (Elder Advisor), and Nick Alexia Sr. (Elder Advisor).

U.S. Fish and Wildlife Service: Spencer Rearden, Aaron Moses, Christopher Tulik, Emmitt Nicori, Christian Alexie Jr., Nate Akers, and Laurie Boeck.

Community Based Harvest Monitors: Carl Napoka Jr. (Tuluksak), Carol Hoagland (Akiak), Crystal Lake (Akiak), Moselle Alexie (Akiachak), Kyra Phillip (Akiachak), Vendella Snyder (Akiachak), Alfred Epchook (Kwethluk), Elizabeth Phillip (Kwethluk), Wesley Nicholai (Napaskiak), Aaron Williams (Napaskiak), Peter Nelson (Napakiak), Verlaine Chris (Tuntutuliak), Susan Jimmie (Tuntutuliak), and Brentina White (Eek). We also acknowledge the work of Orustsaramiut Traditional Native Council's Fisheries Technicians, KRITFC staff, and Yukon Delta National Wildlife Refuge staff to collect Bethel area harvest surveys and aerial boat/net survey data.

Kwethluk Rotary Screw Trap Project Crew: Nate Akers (crew lead), Andrew Magel (KRITFC Fisheries Biologist), Patrick Gregory (Tuluksak), Tim Michael (Kwethluk), Skyler Evans (Bethel), and Daniel O'Connor (KRITFC Fisheries Technician).

Takotna River Weir Project Crew: Robert Perkins (crew lead), Manuel Martinez, Richie Wachter, Daniel Dopler, Junior Martinez, Larry Fox, Dean Gray, and Josiah Martinez.

Camera-Based Escapement Monitoring Crew: Dr. Daniel Auerbach (project lead), Dan Gillikin (Salmon Aniak River Weir crew lead), Aden Burch (Lead, ANSEP), Daniel Dopler (Takotna), and Carley Kelila (Aniak).

QUYANA, DOGIDINH, CHIN'AN, TSEN'ANH, THANK YOU

KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION