



KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

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October 1, 2026

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

Jon Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

RE: KRITFC Comments on C3 BSAI Groundfish Harvest Specifications, October 2026

Dear Chair Drobnica, Mr. Kurland, and members of the Council:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) works to support the federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring. Our 28 Tribal Commissioners, 7-member Executive Council, and 5 In-Season Managers rely on both our Alaska Native values and knowledge as well as the best available Western science to co-manage, protect, and restore Kuskokwim salmon.

As the North Pacific Fishery Management Council (Council) considers reviews preliminary specifications for 2027 groundfish specifications, KRITFC provides the following input:

- **Kuskokwim salmon are still recovering from collapses, and sustained high levels of bycatch in trawl fisheries are affecting their ability to do so.** The Council must take action to reduce the risk of trawl fisheries bycatch to Kuskokwim salmon, including and especially in the pollock trawl fishery, which is responsible for 80-98% of annual Chinook and chum salmon bycatch. This should include reducing the amount of time trawl nets are in the water by reducing the Total Allowable Catch (TAC) for pollock and other trawl-caught species. When quotas are reduced, net-in-water time is likely reduced, and therefore bycatch is likely reduced.

TELIDA | NIKOLAI | TAKOTNA | MCGRATH | LIME VILLAGE | STONY RIVER | SLEETMUTE | RED DEVIL
GEORGETOWN | CROOKED CREEK | NAPAIMUTE | CHUATHBALUK | ANIAK | UPPER KALSKAG | LOWER KALSKAG | TULUKSAK
AKIAK | AKIACHAK | KWETHLUK | BETHEL | OSCARVILLE | NAPASKIAK | NAPAKIAK | KASIGLUK | ATMAUTLUAK
NUNAPITCHUK | TUNTUTULIAK | EEK | QUINHAGAK | KONGIGANAK | KWIGILLINGOK | KIPNUK | CHEFORNAK

- **The projected Super El Niño event could have catastrophic impacts on Western Alaska salmon, especially when coupled with sustained high levels of salmon bycatch.** The Council must act in a precautionary way to prevent salmon bycatch as a brewing El Niño conditions project marine heat waves known to significantly impact Western Alaska Chinook and chum salmon prey availability, body condition, and survival rates. Climate disasters like this are part of the cumulative impacts to our salmon, and they should spur the Council to act to mitigate other harmful impacts within its management authority: namely, bycatch in trawl fisheries.
- **The Council should develop a clear way to incorporate holistic ecosystem and fishery information into the TAC-setting process.** Information about the status of salmon, subsistence salmon fisheries, Salmon People's ways of life, and the collapse of the Bering Sea ecosystem has consistently been provided to the Council in recent years via the Ecosystem Status Reports, in non-specifications agenda items (such as those for chum salmon bycatch management), and through public testimony at the Council and its associated bodies. However, it is unclear how this information is used when making TAC-setting decisions each year as the TACs for pollock and other trawl-caught species have remained high. As salmon and other keystone species of the Bering Sea collapse, how is it that trawl harvest quotas and biomass removals — which are part of the building blocks leading to ecosystem collapse — are allowed to continue? KRITFC urges the Council to evaluate its TAC-setting process and find ways for holistic ecosystem, fishery, and Tribal information to be centered in this process — including and especially about fisheries and species not managed by the Council, but heavily impacted by its decisions. The Ecosystem Committee is an appropriate body to explore this work, though not the only one. Alaska Native Tribes must also be engaged in reviewing, improving, and conducting the TAC-setting process, both in the short- and long-term.

Respectfully submitted,



Kevin Whitworth
Executive Director