



October 2, 2026

Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501

Jon Kurland, Regional Administrator
Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802

Re: C3 BSAI and GOA Proposed Groundfish Harvest Specifications 2027-2028

Dear Chair Drobnica and Director Kurland,

SalmonState submits the following comments regarding the proposed Harvest Specifications for the Bering Sea Aleutian Island (BSAI) and Gulf of Alaska (GOA) groundfish fisheries for 2027 and 2028 under Agenda item C3 of the October 2026 North Pacific Fishery Management Council (NPFMC) meeting.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

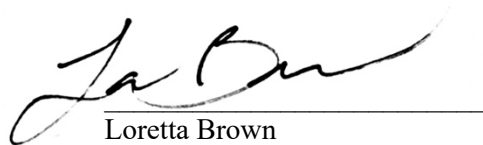
While it may seem that the Harvest Specifications process for groundfish species in the BSAI and GOA is just part of the annual checklist for the NPFMC and NOAA Fisheries, the harvest specifications and Total Allowable Catch decisions by this body and the agency result in consequences for not only those federal managed stocks, but also bycaught species populations and the ocean ecosystem. Management of federal fisheries in the Bering Sea and Gulf of Alaska should be conducted through true Ecosystem-based Fishery Management; including setting TAC limits and Prohibited Species Catch caps for bycatch with a comprehensive look at the target fishery's impacts to the whole ecosystem, including other fisheries, communities, and habitat. Such ecosystem management should also balance the economic benefits of target fishery with the economic, cultural, and ecological devastation it causes and exacerbates, rather than giving the target fishery's economic benefits an unbalanced weight.

Furthermore, TAC for the pollock fleet should reflect the true environmental cost of the trawl efforts and fishing methods, something the current harvest limits fails to do. As such,

SalmonState is deeply concerned with the status of fish populations throughout Alaska and management decisions enabling wasteful practices by the Bering Sea and Gulf of Alaska trawl fleets targeting groundfish. Maintaining the status quo TAC is a reckless approach to fisheries management at a time when ocean conditions are rapidly changing and the stability of fish abundance in that ecosystem is uncertain. Future fisheries of the North Pacific, under both

federal and state management for subsistence, sport, and commercial uses depend upon up-to-date scientific information and careful consideration by decision makers. Setting TAC at any level above a precautionary level, or the most conservative level available under federal regulations, will aggravate the low abundance of other important fish species taken as bycatch in the groundfish fisheries and further adverse impacts to local Alaska communities that depend upon those species. Thank you for providing the opportunity to comment on this important issue. Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'La Brown', written over a horizontal line.

Loretta Brown
Legal and Policy Director
SalmonState