



1976
2026

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

Angel Drobica, Chair | Diana Evans, Executive Director
1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501
Phone 907-271-2809 | www.npfmc.org

October 7, 2026

The Honorable Lisa Murkowski
522 Hart Senate Office Building
Washington, DC 20510
c/o Matt Robinson, Legislative Assistant
Via email: Matthew_Robinson@murkowski.senate.gov

Dear Senator Murkowski:

Pursuant to a request from your office (via email from Kate Fitzgerald dated 8/6/26) to provide comment on fishery related legislation S. 5273 *Fisheries Science Modernization Act*, I am responding on behalf of the North Pacific Fishery Management Council (NPFMC or Council). In compliance with regulatory requirements, our comments focus on technical and factual responses to the legislation as it relates to the Council's ability to fulfill the objectives and activities of its grant.

The Council's highest priority research activity is the collection of environmental and ecosystem data needed as the fundamental basis of fisheries management in the North Pacific, and to meet the administration's objectives of increased sustainable production and economic growth in domestic fisheries. The Council continues to prioritize core fishery-independent fisheries surveys and ecosystem surveys as the source of the quality and quantity of fisheries-specific data (e.g., species identification, age, and length data) needed to reduce uncertainty in fisheries assessments that are used by the Council to recommend catch limits for target fish stocks. Increased uncertainty regarding information used in fisheries assessments can lead to more precautionary catch limits for target fish stocks. The Council recognizes the value of continued attention to strengthening the scientific tools available for developing that information.

Given that funding and capacity at NOAA Fisheries for the surveys has been eroding for the last several years, the Council has been actively engaged with NOAA Fisheries in efforts for survey prioritization, stock assessment prioritization, and survey modernization. The Council also acknowledges the need for evaluation and testing of new technologies and methods for collecting fishery independent data as needed to address existing data gaps and shifting stock distributions, and to improve data quality and responsiveness to change. The bill sets up a framework for developing such technologies in a systematic and standardized way. A structured framework for evaluating emerging technologies could provide important opportunities for coordination among scientists, managers, and the public, while helping to establish consistent approaches for assessing new sources of information, which is consistent with the Council's obligations under our NOAA grant.

A critical tenet of the development of technologies such as the integration of environmental DNA (eDNA) and similar tools into stock assessment, is to conduct side-by-side comparisons of the utility and limitations of such data before making changes that may risk our fundamental data sources (marine surveys). The premise of the proposed legislation aligns with Council comments that exploration of new technologies and methods for collecting fishery independent data should be approached through parallel

testing before making changes that may risk the marine surveys that are the North Pacific's fundamental data source.

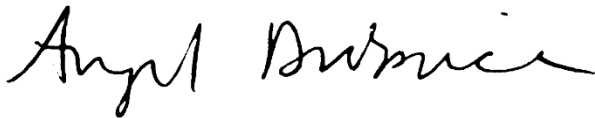
Our region has immense stakeholder support and trust in the long-term survey data sets and foundational fishery-management science. It is critical not to undermine this trust by moving to something different abruptly. Transparency in changes to fishery independent data collection is essential to maintaining credibility. The Council notes the emphasis on collaborative partnerships in the bill, including the Councils, as an effective way to engage stakeholders and the public in the development of these new tools.

The Council also recognizes that the bill includes direct appropriations for the initial pilot study, which may help mitigate NOAA Fisheries resources being diverted away from other priority scientific/management issues. Providing dedicated resources for evaluation and pilot activities can also facilitate focused consideration of new approaches throughout the agency and Council stock assessment review process, while allowing existing scientific and management activities to remain part of the broader process. If funding comes from current sources for survey modernization, however, the Council notes that it will be important to ensure that development of these tools does not erode existing research initiatives. If a loss of funding erodes the quality and quantity of research, that could, in turn, undermine the credibility of the stock assessment and data collection framework which would affect the Council's ability to meet MSA goals and grant objectives.

In December 2025, the Council provided a [response letter](#) to NOAA Fisheries for consideration as part of their assessment of fishery surveys. Many of the Council's 2025 comments about the critical value of fishery independent surveys in our region may also be relevant to the consideration of this bill.

Once again, thank you for the opportunity to review this legislation, and to provide these comments to you on behalf of the North Pacific Fishery Management Council. We look forward to continued dialogue with you, and remain available for a follow-up discussion as appropriate.

Sincerely,

A handwritten signature in black ink, reading "Angel Drobnica". The signature is fluid and cursive, with the first name "Angel" and last name "Drobnica" clearly distinguishable.

Angel Drobnica
Chair

cc: Eugenio Piñeiro-Soler, AA NOAA Fisheries
Regional Fishery Management Councils