

January 26, 2026

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

RE: Comment on Chum Salmon Bycatch Draft Environmental Impact Statement

Dear Mrs. Drobnica:

As a federally recognized Tribe with federally protected subsistence rights under ANILCA Title VIII, and as subsistence users directly affected by fisheries managed under the Magnuson-Stevens Fishery Conservation and Management Act, the Native Village of Georgetown submits the following comments to NOAA Fisheries on the Draft Environmental Impact Statement (DEIS) for chum salmon bycatch management. Georgetown is located along the middle of the Kuskokwim River. The Georgetown Tribal Council is the governing body of the Native Village of Georgetown that represents over 160 tribal members within the Kuskokwim River watershed.

Chum salmon are vitally important for Georgetown's way of life, including achieving food security, preserving our cultural heritage and traditions, supporting our local economy, and sustaining the ecosystem we depend on. However, chum salmon abundance in the Kuskokwim River has plummeted to all-time lows in recent years. These declines have direct and disproportionate impacts to our community, including to food security, public health, cultural continuity, and intergenerational knowledge transmission, as well as to the ecosystem that we depend on.

While fishers from the Native Village of Georgetown and across Western Alaska face severe restrictions and even closures to fishing for chum salmon, vast numbers of Western Alaska chum salmon are still caught as bycatch by commercial trawl vessels in the Bering Sea each year. The pollock trawl fishery is responsible for 99% of the annual Bering Sea chum salmon bycatch, and since 2011, they have removed at least 615,000 Western Alaska chum salmon from the ocean. That means over half a million fish that may have returned to rivers to spawn, feed our families, or provide commercial fishing income to support our communities were instead wasted.

The continued, unrestricted removal of Western Alaska chum salmon as bycatch exacerbates existing environmental justice burdens on Tribal and rural subsistence communities, like Georgetown's, that are already subject to severe fishing restrictions. The Native Village of Georgetown is strongly opposed to this waste and injustice and urges swift action to reduce chum salmon bycatch and protect our salmon.


The Native Village of Georgetown supports the selection of following alternatives: Alternative 2 at a Prohibited Species Catch (PSC) limit of 100,000 chum salmon + Alternative 4 in its entirety + Alternative 5–Option 1 at a PSC limit of 50,000 chum salmon. We urge NOAA Fisheries to adopt this combination of alternatives in final rulemaking.

The DEIS clearly indicates that selecting both Alternatives 2 and 5–Option 1, at their lowest cap options will result in the largest reductions in overall and Western Alaska chum salmon bycatch. Combining the largest possible Western Alaska chum salmon corridor under Alternative 5 with an annual, Bering Sea-wide cap under Alternative 2 ensures all pollock trawl vessels are incentivized to keep their chum salmon bycatch low, and it promotes lower impacts on Western Alaska chum salmon that swim outside of the corridor area. Moreover, it is responsive to years of Tribal requests to implement a low chum salmon cap on Bering Sea pollock trawl fisheries.

Additionally, selecting Alternative 4 would codify existing bycatch reduction practices, helping provide clarity and predictability for the fleet while ensuring these measures are applied consistently and transparently. The DEIS states that adopting Alternative 4 in regulation is unlikely to incur additional costs to industry, and moreover, it is responsive to Tribal calls for increased transparency in and federal oversight of this fishery.

Management decisions that allow status quo high levels of chum salmon bycatch undermine the work Kuskokwim River Tribes are doing to restore chum salmon populations, protect our traditions, and sustain our well-being and way of life. Combining Alternative 4 with both Alternatives 2 and 5–Option 1 is the approach most likely to maximize benefits to chum salmon and Salmon People. The Native Village of Georgetown thus supports the adoption of this combination of alternatives for final rulemaking.

Respectfully submitted,

Signed by:

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Jonathan Samuelson
Council Chairman