



KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

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September 27, 2024

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

RE: KRITFC Comments to NPFMC, October 2024

Dear Chair Drobnica and Members of the Council:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) represents the interests of the 33 federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring. Our Elder Advisors, 28 authorized Commissioners, 7 Executive Council members, and 5 In-Season Managers work to ensure our efforts are guided by our Indigenous Knowledge and values and the best available Western science so we can protect fisheries and traditional ways of life on our river.

We wish to provide comments on several agenda items before the Council, Advisory Panel, and Scientific and Statistical Committee this meeting. First, we would like to share some reflections on the 2024 Kuskokwim River salmon fishing season.

2024 Kuskokwim Salmon Season

Chinook, chum, and coho salmon stocks in 2024, though not nearly as low as in some recent years, were again in low abundance compared to historical levels. As stated in Alaska Department of Fish & Games annual [Three-River Index](#) letter, the preliminary total run size estimate for Chinook salmon is 171,700 fish (CI: 127,000–232,000), with an estimated midpoint escapement of nearly 143,000 fish (CI: 98,300–203,40). Though there is significant uncertainty in these estimates due to a lack of completed spawner assessments this year, this estimated midpoint spawner escapement surpasses the target set by our KRITFC–U.S. Fish and Wildlife Service (USFWS) management team to rebuild these stocks. However, the 2024 Chinook salmon total run size is still well below historical abundance levels, which used to surpass 200,000–300,000 fish. The Kuskokwim is thus still in a state of rebuilding these stocks. Similarly, chum and coho salmon returns were stronger in 2024 than in many of the recent 5 years (2019-2023), yet they feel far short of historical levels. Amounts Necessary for Subsistence (ANS) will not be met for any of these three species this season.

Anticipating low abundance across these species, USFWS at Yukon Delta National Wildlife Refuge, in consultation with KRITFC's 5 Tribal In-Season Managers and support staff, federalized management of federal waters of the Kuskokwim between June 1 and August 17. For the ninth year under our formal co-management agreement, our Tribal-federal team worked together closely

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

throughout these months to balance spawner conservation with providing subsistence fishing opportunities. We believe our precautionary management approach helped us meet our Chinook salmon escapement target as well as allowed many Chinook, chum, and coho salmon to pass through the lower Kuskokwim toward upriver communities and spawning grounds. We also know the subsistence fishing restrictions we agree to impose on our communities are great hardships for our families' abilities to prepare food for the winter and share our traditions with our youth. It was a delicate balance for our management team in 2024, as in every year, but we are hopeful we did good by our salmon and people.

Moving forward, we hope to see gravel-to-gravel efforts—including a reevaluation of Chinook salmon bycatch management—to assist our Tribes' work to rebuild these species populations.

C6: Pelagic Trawl Gear Definition: Initial Review

It is evident that pelagic trawl gear is not operating how it is purportedly intended to operate: to fish in the midwater column, distinguished from gear allowed to contact the ocean floor. Instead, pelagic trawl nets in the Bering Sea drag across the seabed between 40% to 100% of the time, according to an [analysis](#) by staff of this very Council. Moreover, they are legally permitted to do this based on the laws defining their design. KRITFC's Tribes are incredibly concerned about the health of the Bering Sea ecosystem, and particularly how razing habitat on the ocean floor has trickle-up affects to food webs that support salmon, halibut, crab, seals, and other traditional foods upon which we depend.

Given the gravity of this issue, KRITFC is disappointed to see the Council approaching it slowly and merely through regulatory housekeeping of pelagic trawl gear compliance. If this Council wishes to rectify the pelagic trawl performance standard, it needs to begin with a deep discussion on the intent of pelagic trawl gear, which we understand to be to avoid all contact with the seafloor and solely fish the midwater column.

KRITFC urges this Council to update the definition of pelagic trawl gear to exclude its ability from legally fishing on the seafloor. The Council should clarify that the intent and objective of this action is to disallow pelagic trawl gear from contacting the seafloor and instead remain in the midwater column. Until this definition can be updated, pelagic trawl gear should be reclassified as bottom or non-pelagic trawl gear and be excluded from fishing in protected areas closed to bottom trawling, including the Kuskokwim Bay Habitat Conservation Area.

D2: Climate Reports

KRITFC supports the Council's eagerness for climate resilient fishery management. Alaska Native Tribes, including those on the Kuskokwim, are on the front lines of climate change. We are observing and experiencing its impacts in everything from our fisheries to our housing, and we see both these impacts and their climate drivers as interrelated. We also notice that climate impacts to our fisheries are often compounded or conflated by (mis)management practices that prioritize single-stock, inflexible, Western scientific-informed approaches. Management that is instead ecosystem-based, precautionary, adaptable to changing circumstances within a fishing season, and informed by multiple ways of knowing, including and especially Indigenous and local knowledge, is better able to withstand and respond to climate impacts.

KRITFC recognizes that the Council is in the initial stages of developing climate resilient/ready fisheries strategies, yet thus far, there has been minimal outreach to Tribes to share information on the Council's workshops, analyses, and plans for climate resilience. We thus strongly encourage the Council and National Marine Fisheries Service to begin working directly with Alaska Native Tribes

and Tribal consortia to identify these strategies and collaborative, co-produced ways to implement them—especially with and through formal co-management agreements.

KRITFC also encourages the Council to embrace the [SC8's recommendations](#) to include additional socio-economic and cultural data in North Pacific fisheries management. This information should not simply center economic challenges and opportunities but include considerations of how Alaskan marine fisheries management decisions support or harm Alaska Native traditional subsistence practices, identity, food sovereignty and security, and the ecosystems intertwined with our Tribal citizens' well-being. These considerations ultimately need to be incorporated into a more transparent and inclusive TAC-setting process for Alaskan groundfish fisheries, whose bycatch and habitat impacts have ripple effects throughout our river-to-seas ecosystem. Efforts to widen the scope, sources, and use of information in these ways will help this Council move towards climate-resilient, ecosystem-based management and sustain fisheries for this and future generations.

E1: Staff Tasking: [Engagement & Outreach on Chum Salmon Bycatch](#)

KRITFC supports Council staff attending and providing updates on the chum salmon bycatch EIS process during the spring 2025 Regional Advisory Council (RAC) meetings in the Yukon-Kuskokwim Delta, Western Interior, and Eastern Interior regions. The RACs are excellent, well-established forums to engage with rural subsistence users and Tribal citizens, most (if not all) of whom are dedicated salmon fishers. We especially encourage NOAA's National Marine Fisheries Service to engage at the RAC meetings and with the Federal Subsistence Board to increase gravel-to-gravel, cross-jurisdictional fisheries information-sharing and collaboration.

However, KRITFC stresses that the RACs are not Tribal entities, and the most fruitful engagement will come from the Council and NOAA working directly with Tribal governments and consortia. Moreover, Council staff's presentations at the spring 2025 RACs will not be true two-way engagement—in which both parties are sharing and receiving information. Any input from RAC members on chum salmon bycatch will occur after the next DEIS is published (in December 2024) and after the Council has likely selected its preliminary preferred alternative (in February 2025), and thus will not be incorporated into critical next steps of this decision. If the Council wishes to seek two-way engagement with Tribes and rural subsistence users, this needs to begin sooner than February 2025.

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Kevin Whitworth
Executive Director