

Yukon-Kuskokwim Delta, Western Interior Alaska, Eastern Interior Alaska, and  
Seward Peninsula Subsistence Regional Advisory Councils  
c/o United States Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199

In Reply Refer To  
OSM 24019

FEB 06 2024

Angela Drobnic, Chair  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
L92 Building, 4th floor  
Anchorage, Alaska 99501

Dear Chair Drobnic:

The Yukon-Kuskokwim Delta, Western Interior Alaska, Eastern Interior Alaska, and Seward Peninsula Subsistence Regional Advisory Councils (Councils) write to you once again to request a significant reduction in Chinook and Chum salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial fishery and to request voting subsistence representation on the North Pacific Fishery Management Council (NPFMC).

The four Federal Subsistence Regional Advisory Councils writing this letter collectively represent 137 subsistence communities along the Yukon, Kuskokwim, and Unalakleet rivers and tributaries and across the west coast of Alaska that all depend on salmon for food, livelihood, and culture. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charters establish their authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within each Council region. Each Council also reviews resource management actions occurring outside its region that may impact subsistence resources critical to communities served by the Council. The Councils provide a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife across each region.

The Councils each met in October and November 2023 and elected to write this joint letter to express our continued concerns about the impact of salmon bycatch on our subsistence communities and lack of subsistence user group representation on the NPFMC.

### **Subsistence salmon needs are not being met and subsistence users are bearing the burden of conservation**

Subsistence salmon fisheries in our region have experienced complete closures or severe restrictions in recent years due to poor salmon returns. The inability to harvest, process, share, and eat salmon has had significant negative impacts to the nutritional and cultural well-being of the people of our region who have relied on salmon since time immemorial.

Subsistence communities are bearing the burden of conservation. Subsistence salmon fishing has been increasingly restricted over the past ten years due to diminishing Chinook and Chum salmon returns. Subsistence communities with extremely limited resources have been making many conservation efforts to protect the future viability of our salmon and our subsistence fisheries. Subsistence salmon harvests in recent years are the lowest recorded for our communities. Fish camps and freezers have gone empty, and there is no salmon to sustain our many communities through the winter. Meanwhile, BSAI commercial fisheries continue to bycatch salmon that would return to our rivers. It is reasonable that commercial trawl fisheries should take equal responsibility to conserve salmon. Every salmon that makes it to the spawning grounds counts in this time of diminished returns, and every salmon is needed for there to be any chance of a subsistence harvest opportunity.

### **Need for immediate reductions in Chinook and Chum salmon bycatch**

Subsistence salmon needs are not being met in our region, nor are salmon escapement goals set by the Pacific Salmon Treaty. Therefore, the Councils request that salmon bycatch in the BSAI trawl fisheries be significantly reduced below the levels currently authorized by the NPFMC. **The Councils recommend these *immediate* actions:**

- 1) Reduce the Chinook Salmon bycatch cap in the BSAI commercial fisheries to no more than 16,000 fish**
- 2) Implement a non-Chinook (Chum) Salmon bycatch cap of no more than 250,000 fish to reduce recent bycatch levels by half**

The Councils believe that these reduced Chinook and Chum salmon bycatch caps are reasonably attainable and should be implemented right away. We are aware that not all the salmon bycatch is bound for Western Alaska rivers; however, in these dire times every salmon of every age class counts.

Even lower salmon bycatch caps should be implemented for the longer term in order to support Western Alaska Chinook and Chum salmon recovery. **The Councils recommend that *within one year*:**

- 1) Further reduce Chinook Salmon bycatch cap to no more than 10,000 fish**
- 2) Further reduce non-Chinook (Chum) Salmon bycatch cap to no more than 150,000 fish**
- 3) Require 24/7 video monitoring on trawl vessels to ensure salmon bycatch does not exceed these limits**
- 4) Reduce the Total Allowable Catch (TAC) for pollack and other groundfish by 25%**

Reduced bycatch hard caps should remain in place until such time that the Western Alaska salmon fisheries rebound enough to support a healthy salmon population that meets both the needs of subsistence users and escapement goals for future returns. It should be expected that this will take two or more salmon lifecycles, which could be twelve or more years for Chinook Salmon.

BSAI fisheries catch Chinook and Chum salmon by the tens to hundreds of thousands. NPFMC reports recent BSAI Chum Salmon bycatch upwards of over 500,000 fish, and the current Chinook Salmon bycatch limit is set at 45,000. If subsistence fishers cannot harvest enough salmon to feed their families, then the billion-dollar commercial fisheries should also be required to abide by stricter salmon conservation measures, if not be closed altogether, to protect the resources for those who truly need these fish for basic sustenance.

### **Need for subsistence representation on the North Pacific Fishery Management Council**


**The Councils also request that subsistence needs be explicitly considered in the management of BSAI commercial fisheries, and that two designated Alaska Subsistence or Tribal voting seats be added to the NPFMC.** The Councils believe subsistence representation is critical to sustainable salmon management and can be accomplished by adding at least two Alaska subsistence representative seats to the NPFMC. Subsistence fishing communities should be equal stakeholders in the management of shared salmon resources and should have a seat at the NPFMC decision-making table, not just on the Advisory Panel. NPFMC decisions directly affect our lives. Local and traditional knowledge of subsistence fishers is critical to the success of salmon conservation and will be an asset to the NPFMC. To maintain objectivity, subsistence or Tribal representatives appointed to the NPFMC should not have any direct personal economic ties to the Commercial Development Quota (CDQ) fisheries. Subsistence or Tribal representative seats must be included on the NPFMC with amendment to the next reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act.

There is precedence and a pathway for this process in place already for the western coast states; namely, Federally Recognized Treaty Tribes hold a seat on the Pacific Fishery Management Council. While Alaska Tribes do not have the same fisheries treaty protections, all Federally recognized Alaska Tribes have retained government to government authority. Rural subsistence communities also have subsistence priority on Federal lands and waters under Title VIII of ANILCA. That subsistence priority is effectively eliminated when salmon escapement is so low it causes severe restrictions or complete closure to any subsistence harvest. Therefore, we need Alaska Subsistence or Tribal representative seats on the NPFMC to be able to vote on fisheries management actions and conservation measures that impact the continuation of subsistence uses.

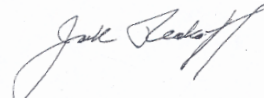
Thank you for the opportunity to provide these recommendations to the NPFMC. We look forward to a written reply to our requests and continuing discussions about the issues and concerns of subsistence users of the Yukon-Kuskokwim Delta, Western Interior Alaska, Eastern Interior Alaska, and Seward Peninsula subsistence regions. If you have questions

about this letter, please contact Katerina Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or [katerina\\_wessels@fws.gov](mailto:katerina_wessels@fws.gov).

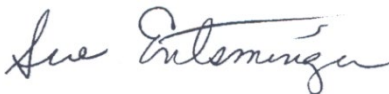
Sincerely,



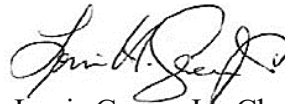
Raymond Oney, Chair  
Yukon-Kuskokwim Delta Subsistence  
Regional Advisory Council



Jack Reakoff, Chair  
Western Interior Alaska Subsistence  
Regional Advisory Council



Sue Entsminger, Chair  
Eastern Interior Alaska Subsistence  
Regional Advisory Council



Louis Green, Jr., Chair  
Seward Peninsula Subsistence  
Regional Advisory Council

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Western Interior Alaska Subsistence Regional Advisory Council  
Eastern Interior Alaska Subsistence Regional Advisory Council  
Seward Peninsula Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of  
Fish and Game  
Administrative Record