



Tikahtnu Inter-Tribal Fish Commission

P.O. Box 39070
Ninilchik, Alaska, 99639

March 25, 2025

To: North Pacific Fishery Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501

From: Tikahtnu Inter-Tribal Fish Commission
Co-Chair Debra Call
Co-Chair Samuel Schimmel

Re: Discussion Paper on Proposed Tribal Salmon Fishery

Dear Council Members:

The Tikahtnu Inter-Tribal Fish Commission (TIFC) submits this official communication on behalf of its Member Tribes: Chickaloon Native Village, Native Village of Eklutna, Kenaitze Indian Tribe, Knik Tribe, Ninilchik Village Tribe, Salamatof Tribe, and Seldovia Village Tribe. Each of these federally recognized Tribes¹ has authorized the TIFC's work through legally enacted Tribal resolutions, and their representatives formally approved this fishery management plan at the TIFC meeting on February 14, 2025.

Established under the sovereign authority of its Member Tribes, the TIFC operates with delegated Tribal authority to secure and protect Tribal access to fisheries, influence fishery management, and advance Tribal co-stewardship. We are empowered to speak on behalf of our Member Tribes on fishery matters.

We respectfully request the development of a discussion paper on how a Tribal Salmon Fishery (TSF) in the Cook Inlet Exclusive Economic Zone (CI EEZ) can be implemented and what that fishery should look like. We ask that this discussion paper have a due date no later than 6

¹ *Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs*, 89 Fed. Reg. 944-48 (Jan. 8, 2024).

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months. Our people have relied upon the salmon in Cook Inlet since time immemorial for nutritional, customary, spiritual, and traditional needs. The ability to harvest salmon is vital to our continued existence. In line with this goal, we have collaborated with the National Marine Fisheries Service (NMFS) to develop a proposal for a TSF in the CI EEZ, which is attached below (Attachment I). This proposal seeks to provide a fair and just solution to an ongoing social and economic harm - the exclusion of Tribes from this federal fishery. We thank NMFS, particularly Mr. Kurland, Ms. Harrington, Mr. Duncan, Mr. Brenner, and Ms. Wilson for their instrumental help in creating this proposal and for their commitment to working with Tribes.

Please note that this ask for a discussion paper is not without precedent; last year at the February meeting of the NPFMC, the Advisory Panel (AP) passed a motion supporting a discussion paper on this topic.

To provide further clarity on our proposal, we present the following key understandings:

- Tribes are united in their acceptance of the attached proposal.²
- The attached proposal has been created jointly by NMFS and by the Tribes. The final proposal that has been agreed to and is attached has been proposed by NMFS.
- The process to generate and agree on this proposal was initiated over a year ago and has consisted of many letters and meetings. This proposal has not been rushed nor is it poorly thought out; it is the culmination of a near 40 year effort.
- The TSF will primarily be a Sockeye salmon fishery - it will not target Chinook, Coho, Chum, or Pink salmon nor according to the 2024 harvest data compiled by NMFS will it catch any of these species in numbers that create conservation concerns.
- The TSF is intended solely to ensure that Tribal members, especially elders and youth, have access to a resource we have utilized for tens of thousands of years - salmon. We just want to be able to fill our smokehouses and freezers once again.
- Once caught, TSF fish would be used to provide for the customary, traditional, cultural, nutritional, Tribal, and food security needs of the Tribes.

With these understandings in mind there are a few mechanical clarifications that must be made:

- Under the proposal we seek to use commercial gear - this is imperative as it allows for expedient harvest and for Tribes to utilize existing boats to engage in the fishery.

² See note 1.

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- Under the proposal we are more than happy to meet the regulatory gear and reporting requirements placed on commercial fishermen, however, regulations placed on Tribes should be no more restrictive or resource intensive than those placed on commercial users of the fishery. This is only fair.
- The purpose of this fishery is to provide for the customary, traditional, cultural, nutritional, Tribal, and food security needs of the Tribes. We are not asking to be able to sell our entire catch. The limited sale of fish will be used to recover some of the costs of engaging in the fishery.

We appreciate your attention to this matter and look forward to collaborating with the North Pacific Fishery Management Council to establish a Tribal Salmon Fishery in the Cook Inlet Exclusive Economic Zone. Please direct any correspondence to Debra Call (CookInletFishers@gmail.com) and Samuel Schimmel (SamuelUschimmel@gmail.com). Thank you for considering our request.

Sincerely,

Debra L. Call 2025-03-28

Co-Chair Debra Call

Samuel Schimmel 2025-03-28

Co-Chair Samuel Schimmel

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ATTACHMENT I

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Current and potential Cook Inlet EEZ salmon fishery management measures
text in bold are additional potential management measures identified by NMFS

	Existing Cook Inlet EEZ commercial salmon fishery management measures	Possible Cook Inlet EEZ tribal salmon fishery management measures
Who can fish?	Persons with a Salmon Federal Fisheries Permit from NMFS and a State Commercial Fisheries Entry Commission limited entry Permit required to land fish in Alaska	Persons issued a permit from a federally recognized Cook Inlet region tribe ¹ <ul style="list-style-type: none"> ● Community harvest permit² ● Individual tribal member permit³
Who is eligible to obtain a permit?	Any US citizen	Criteria determined by each eligible tribe for each permit type
When can they fish?	June 20 to July 15 <ul style="list-style-type: none"> ● Mon & Thu 7am-7pm July 16 to July 31 <ul style="list-style-type: none"> ● Thu 7am-7pm Aug 1 to Aug 15 <ul style="list-style-type: none"> ● Mon & Thu 7am-7pm 	Option 1: Fishing allowed any time salmon are present, no fixed periods ⁴ * Option 2: Same as commercial season
Where can they fish?	All upper Cook Inlet EEZ waters	Same as the commercial fishery. ⁵
How much can they catch?	No daily limit, up to Total Allowable Catch set by NMFS	Option 1: No daily limit, up to Total Allowable Catch set by NMFS <ul style="list-style-type: none"> ● Set-aside a portion of the TAC for the tribal salmon fishery⁶

¹ Ninilchik Traditional Council letter dated 3/25/24. “We ask that eligibility for this fishery be afforded to all interested federally recognized Tribes, listed pursuant to the 1994 Tribal List Act, in the Cook Inlet Region of Alaska.”

² Ninilchik Traditional Council letter dated 3/25/24. “...the Tribe may then designate a person or several people to fish this community harvest permit.”

³ Ninilchik Traditional Council letter dated 3/25/24. “Under this certificate [SHARC], Tribal members are subject to gear restrictions and daily limits, however no seasonal limits are imposed on SHARC holders. We ask that a similar certificate be included in the Cook Inlet EEZ TSF.”

⁴ Ninilchik Traditional Council letter dated 7/26/24. “It is the will of the Tribe that the TSF have no openers or periods.”

⁵ Ninilchik Traditional Council letter dated 3/25/24. “We the Ninilchik Village Tribe formally ask that a TSF be established in Cook Inlet waters under federal management.”

⁶ Ninilchik Traditional Council letter dated 7/26/24. “In the event the Cook Inlet Tribes are allocated a portion of the TAC for the TSF, such an allocation will need to be fair, just, and satisfy Tribal needs. Such an allocation would be managed by the Tribes in cooperation with each other.”

Note 1: The Tribes adopt this entire proposal save for the suggestion that Tribal Fishing would be limited to the commercial season and openers. The Tribes propose that Tribal fishing be allowed 24 hours a day during the time that

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salmon are present. (I.e. if salmon are present in the CI EEZ from June 1st - August 15 then Tribal fishing could occur any day and any time during that time period).

		Option 2: No annual or seasonal limit ^{7**}
Which vessels can be used?	No limitations	No limitations ⁸
Allowable use of fish	Sell commercially Retain for personal consumption	<ul style="list-style-type: none"> ● Customary, traditional, cultural, nutritional, Tribal, and food security needs of the Tribe.⁹ ● Monetary exchange¹⁰
Input into management	<ul style="list-style-type: none"> ● Public comment on Council consideration of Cook Inlet EEZ Area issues ● Public comment on NMFS rulemaking 	<ul style="list-style-type: none"> ● Public comment on Council consideration of Cook Inlet EEZ Area issues ● Public comment on NMFS rulemaking ● Issue tribal permits ● Tribal consultation ● Tribal co-management agreement with input into¹¹: <ul style="list-style-type: none"> ● TAC setting ● Developing regulations ● Research
Can groundfish bycatch be retained?	Yes, with a Federal Fisheries Permit for groundfish	Same as the commercial fishery.
Fishing in both State and EEZ waters?	No fishing State and EEZ waters on the same day.	Same as the commercial fishery.

⁷ Ninilchik Traditional Council letter dated 3/25/24. "We ask that ... no annual limit on Tribal harvests be imposed on Tribal TSF permit holders."

⁸ Ninilchik Traditional Council letter dated 3/25/24. "We do not seek to limit the types of vessels and gear to be used, we seek only to ensure that vessels used for commercial fishing are not foreclosed or restricted from being used in the TSF."

⁹ Ninilchik Traditional Council letter dated 3/25/24. "Once caught, fish would be used to provide for the customary, traditional, cultural, nutritional, Tribal, and food security needs of the Tribe."

¹⁰ Ninilchik Traditional Council letter dated 3/25/24. "We ask that TSF Tribal and individual permit holders be able to engage in the customary trade of salmon caught in the TSF through monetary exchange equivalent to the costs of engaging in the TSF. We ask that the Tribe hold the authority to determine the costs of engaging in the TSF."

¹¹ Ninilchik Traditional Council letter dated 3/25/24. "Tribal co-management would be ideal for other aspects of the fishery - setting total allowable catch (TAC), creating regulations, and conducting research. Such a partnership is desired and could be memorialized in a co-management agreement."

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Legal gear	Gillnets 200 fathoms in length, 45 meshes deep, mesh no greater than 6 inches.	Same as the commercial fishery. ¹²
How are vessel locations monitored?	Vessel Monitoring System (tracks vessel position)	Same as the commercial fishery.
How are catch amounts reported?	eLandings (Federal fish ticket)	Same as the commercial fishery. ^{13, 14}
How are marine mammal and seabird interactions monitored?	Self reporting	Same as the commercial fishery.
Standardized bycatch reporting methodology	Logbook	Same as the commercial fishery.
Accountability measures (required to prevent exceeding annual catch limits)	TAC, Fishery closure	Same as the commercial fishery.

*Allowing fishing any time salmon are present significantly complicates salmon management and fishery monitoring and enforcement. The impact of salmon fisheries on each stock is typically carefully controlled by when a fishery is open. More information is needed to consider which stocks would be harvested by a TSF.

**Limits on individual harvesters may not be required, but NMFS must be able to close the fishery if warranted to avoid exceeding a TAC.

¹² Ninilchik Traditional Council letter dated 7/26/24. "We ask that gear related restrictions for the TSF "be no more restrictive than the restrictions placed on commercial fishermen engaging in the Cook Inlet commercial salmon fishery."





¹³ Ninilchik Traditional Council letter dated 3/25/24. "We ask that any reporting burden placed on TSF permit holders be no more burdensome than reporting requirements placed on other salmon fishers engaging in the Cook Inlet EEZ salmon fishery."

¹⁴ Ninilchik Traditional Council letter dated 7/26/24. "If other fishermen are using similar gear, are using eLandings to report their catch, our Tribe would be open to doing so as well."

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Audit trail

Details	
FILE NAME	NPFMC Tribal Salmon Fishery Proposal - 3/28/25, 2:28 PM
STATUS	● Signed
STATUS TIMESTAMP	2025/03/28 18:31:37 UTC

Activity		
 SENT	samueluschimmel@gmail.com sent a signature request to: <ul style="list-style-type: none">Samuel Schimmel (samueluschimmel@gmail.com)Debra L. Call (cookinletfishers@gmail.com)	2025/03/28 18:27:56 UTC
 SIGNED	Signed by Debra L. Call (cookinletfishers@gmail.com)	2025/03/28 18:31:37 UTC
 SIGNED	Signed by Samuel Schimmel (samueluschimmel@gmail.com)	2025/03/28 18:28:25 UTC
 COMPLETED	This document has been signed by all signers and is complete	2025/03/28 18:31:37 UTC

The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.