

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

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In Reply Refer To
RAC.D25006

JANUARY 31 2025

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

Dear Chair Drobnica:

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Councils (Council) to share feedback on the preliminary draft Chum Salmon Bycatch Management alternatives.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on August 21-23, 2024, in Bethel. Among the items discussed were the preliminary Chum Salmon bycatch management alternatives. Although an updated version of the preliminary alternatives was later published on December 20, 2024, the Council's comments are still relevant to the options being considered during the North Pacific Fishery Management Council's (NPFMC) special February 2025 meeting on the subject.

- The Council **strongly opposes Alternative 1, the no action alternative**, because it will maintain the status quo and not reduce Chum Salmon bycatch.
- The Council **supports Alternative 2 - Overall Bycatch Prohibited Species Catch (PSC) Limit for Chum Salmon**, as the Council has previously advocated for the establishment of an overall cap on Chum Salmon bycatch. The bycatch limit should

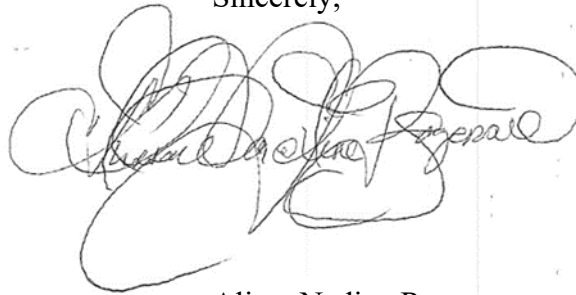
be no more than 100,000-150,000 fish, and we advocate for the limit to be the lower end of that range.

- The Council also **supports time and area fishing closures or the establishment of a “conservation corridor”** to further protect Chum Salmon.

Overall, the Council believes that implementation of multiple alternatives is necessary for adequate protection of Chum Salmon, and we look forward to learning more about how they might be implemented at the outreach and engagement session during our winter 2025 meeting.

Thank you for considering our initial comments on the Chum Salmon bycatch alternatives. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Alissa Nadine Rogers". The signature is stylized and somewhat cursive, with large loops and flourishes.

Alissa Nadine Rogers
Acting Chair

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta 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 of Wildlife Conservation, Alaska Department of Fish and Game
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