

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

APR 12 2022

In Reply Refer To
RAC.22032.EP

Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501

Dear Chairman Kinneen:

The Yukon-Kuskokwim Delta, Western Interior Alaska, Eastern Interior Alaska, and Seward Peninsula Subsistence Regional Advisory Councils (Councils) write to you to request a significant reduction in Chinook and Chum salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial fishery *and* to request subsistence representation on the North Pacific Fishery Management Council (NPFMC). The Councils will further request the Federal Subsistence Board elevate the concerns expressed in this letter to the Secretary of Commerce.

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 cultural significance. 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 Council provides 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 February and March 2022, and elected to write this joint letter to address the ongoing concerns about the impact of salmon bycatch on our subsistence communities and lack of representation on the NPFMC.

Subsistence salmon fishing on the Yukon and Kuskokwim rivers was catastrophic this year

The Chinook and Chum salmon run failures in 2021 resulted in the complete closure or severe restriction of subsistence salmon fishing for all communities along the Yukon, Kuskokwim, and Unalakleet Rivers, tributaries, and Yukon coastal communities. For the second year in a row, the Yukon River Chum and Coho salmon returns were the lowest on record. The crash of the Chinook and Chum salmon populations will likely result in severe restrictions or complete closure to subsistence fishing across western Alaska again this year. Subsistence salmon needs are not being met across Alaska. Pacific Salmon Treaty Chinook and Chum salmon escapement goals with Canada have not been met. Subsistence communities are bearing the burden of conservation. Subsistence salmon fishing has been increasingly restricted over the past ten years due to diminishing Chinook Salmon returns. These concerning low returns, along with the catastrophic decline of Chum Salmon, caused complete closures to the harvest of salmon for subsistence. Fish camps and freezers went empty, and there is no salmon to sustain all our many communities through the winter. This is truly a crisis of such magnitude that requires immediate and meaningful action to reduce all unnecessary mortality to western Alaska salmon stocks.

Meanwhile, the Bering Sea trawl fisheries continue unabated. 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. 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. The Bering Sea is essential salmon rearing grounds, and it may take four to five years or more to rebuild Chinook and Chum runs and see returns of healthy adult salmon to spawn in western Alaska rivers again. If subsistence fishers cannot harvest a single salmon, then the billion-dollar commercial fisheries should also enact stricter salmon conservation measures, if not be closed altogether to protect the resources for those who truly need these fish for basic sustenance.

The Councils request that salmon bycatch in the Bering Sea trawl fisheries be significantly reduced below the levels currently authorized by the NPFMC in order to protect this important subsistence food that is critical for our survival and the continuation of our traditional lifestyle. The Councils recommend that the Chinook Salmon bycatch cap in the BSAI commercial fishery be immediately reduced to at most 16,000 fish. Non-Chinook (Chum) bycatch should also be immediately reduced at least by half the recent bycatch levels to no more than 250,000. The Councils believe that these reduced Chinook and Chum salmon bycatch caps are reasonably attainable and should be implemented right away. 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 a year that bycatch should be further reduced to a 10,000 Chinook Salmon hard cap limit and a 150,000 Chum Salmon hard cap limit. The Councils recommend that video monitoring be implemented on all trawl fishing vessels with 24/7 coverage to ensure salmon bycatch does not exceed these hard cap limits. These lower limits should remain in place until such time that the Western Alaska salmon fishery rebounds enough to support a healthy salmon population that meets both the needs of subsistence users and escapement goals for future returns. The current authorized levels of salmon bycatch are not low enough to ensure there is enough salmon for subsistence users. Subsistence

communities depend on these shared resources and have been adversely affected by sweeping in-river restrictions and complete closures to subsistence salmon harvest this past year.

It is imperative to the people of these regions that immediate action be taken to the reduce Bering Sea trawl fisheries the bycatch of Chinook and Chum salmon. Over many years, subsistence communities with extremely limited resources have been making many conservation efforts to protect the future viability of the fishery. Despite these efforts, access to this critical food source is now being severely restricted. Our subsistence salmon harvest in recent years is the lowest harvest levels has been recorded for Western Alaska communities. It is reasonable that the billion-dollar commercial trawl fisheries should take responsibility to further reduce salmon bycatch. 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 subsistence representation on the North Pacific Fishery Management Council

The Councils also request that subsistence needs be explicitly considered in the management of Bering Sea commercial fisheries. The Councils believe subsistence representation is critical to this objective and can be accomplished by adding at least two Alaska subsistence representative seats to the NPFMC. Subsistence fishing communities are equal stakeholders in the management of this shared salmon resource and should have a seat at the decision-making Council table, whose decisions directly affects our lives. Local and traditional knowledge of subsistence fishers is critical to the success of salmon conservation management and will be an asset to the NPFMC. We request two designated Alaska Subsistence or Tribal seats be added to the NPFMC. 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 Tribes have retained government to government authority. Rural subsistence communities do 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. To maintain objectivity, these subsistence or Tribal representatives 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.

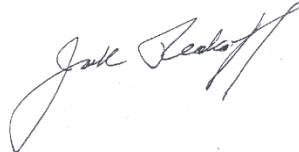
Secretary of Commerce Raimondo recently announced Fisheries Disaster Declarations for the Yukon, Kuskokwim, and Norton Sound Fisheries. This acknowledgement is very important. However, even if subsistence communities were to receive some economic relief for the loss of food and livelihood we have suffered, no amount of money can possibly replace the millions of pounds of healthy subsistence salmon, we rely on to survive. Nothing can replace the devastating loss of our salmon culture and way of life. All conservation measures are necessary to help rebuild and sustain the salmon population for future generations.

Thank you for the opportunity to provide these recommendations the NPFMC. We look forward to 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 Katya Wessels, Council Coordination Division Supervisor, Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885 or 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

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Administrative Record