

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

RAC/YKD21009.EP

APR 02 2021

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

Re: Comment on Agenda Item D5 - North Pacific Fisheries Management Council Meeting

Dear Chairman Kinneen:

The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) is providing comments and recommendations on salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial fishery under D5 on the agenda for the upcoming April 12-17, 2021 North Pacific Fisheries Management Council (NPFMC) meeting.

We are writing this letter to convey the importance of Chinook and Chum Salmon for the many subsistence communities in the Yukon-Kuskokwim Delta region and urge the NPFMC to continue its efforts to significantly reduce Chinook and Chum Salmon bycatch in the Bering Sea/Aleutian Islands trawl fisheries and mitigate the impacts it has had to our communities. The Council also resubmits our previous 2020 comment letter (enclosed) to the NPFMC for your consideration at this 2021 meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Yukon and Kuskokwim Rivers, as well as coastal and island communities in the region. The Council 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 establish its 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 the 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 within the region.

The Council met by teleconference on March 3-4, 2021, to make recommendations on subsistence regulations for the region, receive subsistence resource management reports, and review pre-season fisheries forecasts for both the Yukon and Kuskokwim Rivers.

The Council also received a presentation by NPFMC Senior Scientist, Diana Stram, and very much appreciates this information and opportunity for discussion with Ms. Stram.

The Council requests that salmon bycatch in the Bering Sea trawl fisheries be significantly reduced below the levels currently authorized by the NPMFC in order to protect this important subsistence food that is critical for our survival and the continuation of our traditional lifestyle. The Council recommends that the Chinook Salmon bycatch cap in the BSAI commercial fishery be reduced to 17,000, as we requested in our earlier 2020 correspondence (attached). The Council believes this Chinook Salmon bycatch cap should remain in place until such time that the Chinook Salmon fishery rebounds enough to support a healthy salmon population which meets both the needs of subsistence users and escapement goals for future returns. We are contacting you again to clearly state the current allowable levels of authorized salmon bycatch may not be sufficient to address protection of the subsistence users dependent upon these common property resources as documented through sweeping in-river restrictions.

Despite the Bering Sea trawl fishery salmon conservation measures implemented by the NPFMC in the past few years, the Chinook and Chum Salmon bycatch still remains very high. The Council continues to be very concerned with Chinook and Chum salmon bycatch on the Bering Sea and remains engaged on this issue for subsistence users who depend on this resource for nutritional and cultural survival in our region. As noted in the previous letter, many communities have experienced hardship over the last six years with low Chinook Salmon returns that have resulted in severe restrictions on the subsistence harvest of all fish due to conservation measures to meet Chinook Salmon escapement goals. Communities all along the Yukon and Kuskokwim rivers have worked diligently to support these conservation efforts so that our children will be able to continue to harvest Chinook Salmon in the future and live the subsistence way of life that revolves around family fish camp. In 2020, both Chinook and Chum salmon had one of the latest and worst returns, and all subsistence fishing was so severely restricted on the Yukon and Kuskokwim rivers that few subsistence communities met their subsistence needs. Many subsistence families along the entire Yukon River had no salmon to put up for the winter.

Council members and the rural communities we represent have tried repeatedly to convey the essential importance of salmon to our life and livelihood: salmon is who we are as people, it is our culture and way of life that we are born into. The salmon declines and resulting severe restrictions to subsistence fishing is tearing away at the fabric of our culture, community, and families. The transmission of knowledge conveyed from generation to generation at family fish camp is being lost. Not only do we not have fish to feed our families, we do not have fish to share with others. Sharing is a central component of our cultural values and takes care of our elders, those in need, family, friends, bonds with communities across the region and is central to our celebrations and ceremonies. *There is no other resource available to replace salmon for our communities.*

It is imperative to the people of this region, that the Bering Sea trawl fisheries take further action to reduce Chinook and Chum Salmon bycatch. Subsistence communities

with extremely limited resources are making every conservation effort, over many years, to protect the future viability of the fishery and are now being so severely restricted that our subsistence harvest is consistently among the lowest since the harvest levels has been recorded. It is reasonable that the multi-million dollar commercial trawl fisheries should take responsibility to further reduce salmon by-catch. Every salmon counts now to make it to the spawning grounds and every salmon counts for there to be any subsistence harvest opportunity.

We look forward to ongoing efforts to limit bycatch in the BSAI trawl fishery, and urge the NPFMC to recognize the importance of salmon to our subsistence communities and take further action to significantly reduce Chinook Salmon bycatch at this time.

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 Region. If you have questions about this letter, please contact Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3358 or [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov).

Sincerely,



Raymond Oney, Chair  
Yukon Delta Regional Advisory Council

Enclosure

cc:

Diana Stram, PhD., Senior Scientist, North Pacific Fisheries Management Council  
Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Tom Kron, Statewide Support Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison and Acting Fisheries Division Supervisor,  
Office of Subsistence Management  
Pippa Kenner, Acting Policy Coordinator, Office of Subsistence Management  
Brent Vickers, Anthropology Division Supervisor, Office of Subsistence Management  
Katerina Wessels, Supervisory Program Analyst, Council Coordination Division,  
Office of Subsistence Management  
Eva Patton, Council Coordinator, Office of Subsistence Management  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



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c/o U.S. Fish and Wildlife Service  
Office of Subsistence Management  
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MAY 27 2020

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

Dear Chairman Kinneen:

I am writing on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments and recommendations on Chinook Salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial fishery. We are writing this letter to convey the importance of Chinook Salmon to the many subsistence communities in the Yukon-Kuskokwim Delta region and urge the North Pacific Fisheries Management Council (NPFMC) to continue its efforts to significantly reduce Chinook Salmon bycatch in the Bering Sea/Aleutian Islands trawl fisheries and mitigate the impacts it has had to our communities.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Yukon and Kuskokwim Rivers, as well as coastal and island communities in the region. The Council 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 establish its 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 the 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 within the region.

The Council met by teleconference on March 16-17 to make recommendations on subsistence fisheries regulations for the region, and review preseason fisheries forecasts for both the Yukon and Kuskokwim Rivers. The Council continues to be very concerned with Chinook and Chum salmon bycatch on the Bering Sea and remains engaged on this issue for subsistence users who depend on this resource for nutritional and cultural survival in our region. Many communities have experienced hardship over the last five years with low Chinook Salmon returns that have resulted in severe restrictions on the subsistence

harvest of all fish due to conservation measures to meet Chinook Salmon escapement goals. Communities all along the Yukon and Kuskokwim Rivers have worked diligently to support these conservation efforts for the future of Chinook Salmon so that our children will be able to continue to harvest Chinook Salmon and live the subsistence way of life that revolves around family fish camp. However, external environmental stressors have been affecting returning salmon before they reach the spawning grounds. Last year the extreme heat and high water temperatures on the Yukon and Kuskokwim Rivers caused large scale fish die-offs. Changes in the marine environment have caused seabird die-offs and likely will affect salmon productivity as well. These environmental impacts to salmon are beyond anyone's immediate control but make it all the more important to reduce Chinook Salmon mortality where it can be managed. Therefore the Council requests that salmon bycatch in the Bering Sea trawl fisheries be significantly reduced in order to protect this important subsistence food that has sustained all of our communities for millennia. The Council voted to submit this letter to request that the Chinook Salmon bycatch cap in the BSAI commercial fishery be reduced to 17,000. The Council believes this Chinook Salmon by-catch cap should remain in place until such time that the Chinook Salmon fishery rebounds enough to support unrestricted subsistence fishing.

We appreciate the ongoing efforts to limit bycatch in the Bering Sea/Aleutian Island trawl fishery, and urge the NPFMC to recognize the importance of salmon to our subsistence communities and take further action to significantly reduce Chinook Salmon bycatch at this time. Subsistence communities have been making sacrifices for years in support of Chinook conservation and believe big industry can make further efforts to reduce mortality to Chinook Salmon at sea. It is especially imperative to take further action to reduce bycatch now when extreme heat and changing ocean conditions are impacting salmon health and survival. Every fish counts to meet subsistence needs and provide enough salmon make it to the spawning grounds in every tributary in the region. The Council requests a report back from the NPFMC on this issue and invites you to provide this update at our fall meeting scheduled for October 6-7, 2020, in Bethel.

Thank you for the opportunity to dialogue with the NPFMC. We look forward to continuing discussions about the issues and concerns of subsistence users of the Yukon-Kuskokwim Delta Region. If you have questions about this letter, please contact Eva Patton, Council Coordinator, with the Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3358.

Sincerely,



Alissa Nadine Rogers, Chair  
Yukon Delta Regional Advisory Council

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Sue Detwiler, Assistant Regional Director, Office of Subsistence Management  
Tom Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Tom Kron, Acting Council Coordination Division Supervisor,  
Office of Subsistence Management  
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management  
Pippa Kenner, Anthropologist, Office of Subsistence Management  
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