

**Yukon-Kuskokwim Delta and Eastern Interior Alaska
Subsistence Regional Advisory Councils**
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
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In Reply Refer To:
OSM.A24067

JULY 11 2024

Anthony Christianson, Chair
Federal Subsistence Board
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199

Dear Chair Christianson,

We write to you on behalf of the Yukon-Kuskokwim Delta and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to request that the Federal Subsistence Board (Board) elevate our Councils' appeal for an urgent revision of the Magnuson-Stevens Fishery and Conservation Management Act (MSA) to the Secretaries of the Interior and Agriculture. The MSA must be amended so that it considers and protects subsistence uses more equitably and prioritizes conservation over economic uses in situations where affected fish populations are in dire shape, as is currently happening with salmon in Western Alaska.

The ten Subsistence Regional Advisory Councils met together during the All-Council Meeting March 5-8, 2024, in Anchorage, Alaska. Among the items discussed was the need to revise the MSA. Presently, the National Standard Guidelines in the MSA are implemented in such a way that prioritizes commercial uses over subsistence uses and conservation, ignores the cascading effects of harvest, bycatch, and habitat degradation across the entire ecosystem, and does not adequately account for the uncertainties of climate change. The Councils work against policies that reinforce the status quo of cultural and environmental injustice for rural Alaska communities, Tribes, and federally qualified subsistence users. Our Councils, along with many other organizations and Tribes in Alaska, have long requested interventions on these issues, but our efforts have not resulted in meaningful actions. Revising the MSA as we are suggesting is a meaningful step toward creating a more equitable legal framework for fisheries management.

Our Councils request that the Board urge the Secretaries to liaise with the Department of Commerce and National Marine Fisheries Service (NMFS) to publish a proposed rule that updates the MSA as follows:

- Enhancements to conservation measures, requirements for ecosystem-based management, and management that adapts to changes in climate.
- Changes to the membership of the North Pacific Fishery Management Council (NPFMC) and the nomination and appointment process for Council members. There should be at

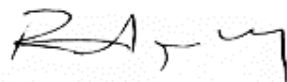
least two subsistence representatives nominated by federally recognized Alaska Tribes added as voting members to the NPFMC and the Governor of Alaska should not have the sole authority to make the other appointments to Alaska seats.

- Modifications to National Standards in the MSA, including the following:
 - National Standard 4 - Allocations: The “overall benefit” must include cultural wellbeing, food security, historical dependence, and ecological health. Allocations for subsistence uses of fish stocks must be considered. It should also be made clear that bycatch limits imposed on a specific sector are not “allocations” in the sense that they afford the sector a right to any non-target catch (bycatch).
 - National Standard 8 - Communities: It must be clear that the burden of conservation measures for declining fish stocks should be shared by all user groups, including those that catch fish as bycatch. These shared conservation measures should provide for the continued participation of subsistence fishing communities of the fish stock. Subsistence fisheries should never be closed while commercial fisheries on those stocks continue to operate.
 - National Standard 9 - Bycatch: Clearly define ‘practicability’ and emphasize that what is achievable in terms of bycatch reductions, may not also be easy or convenient for fishery participants. Bycatch measures approved by Regional Fishery Management Councils such as the NPFMC should be consistently reevaluated on a regular basis to pursue further reductions. The work of bycatch minimization should never be complete until bycatch can be brought to zero.

The Councils ask that the Board expeditiously forward this letter to the Secretaries of the Interior and Agriculture and kindly urge them to advocate for updates to the MSA that will allow for fisheries to be holistically managed across jurisdictions in the marine and freshwater environments and that prioritize subsistence uses over commercial uses. For additional background information on these issues, we ask that the Board reference the number of previous joint and individual Council letters on the topics of bycatch and salmon management.

Thank you for your timely attention to this important matter. If you have questions or would like to discuss this further, please contact Brooke McDavid, Council Coordinator, at (907) 891-9181 or, brooke_mcdavid@fws.gov.

Sincerely,



Raymond Oney, Chair
Yukon-Kuskokwim Delta
Regional Advisory Council

A handwritten signature in black ink that reads "Robert C. Wright, Sr." The signature is written in a cursive style with a large, stylized initial 'R'.

Robert Wright, Sr., Chair
Eastern Interior Alaska
Regional Advisory Council

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Administrative Record