

Eastern Interior Alaska Subsistence Regional Advisory Council

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Märit Carlson-Van Dort, Chair
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the December 10–16, 2024, Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Board of Fisheries (BOF) Meeting.

The Council held a public meeting on October 8–10, 2024, in Fairbanks, and where they took up three BOF Copper River Salmon Proposals. The proposals are of importance to the Council because residents of the Eastern Interior region have positive customary and traditional use determinations for salmon in the upper Copper River. Please see the Council comments below for Proposals 51–53.

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District

The Council **supported Proposal 51** on a unanimous vote. The Council agrees with the proponent that BOF action is needed to mitigate the persistent disproportionate exploitation of salmon stocks with early migratory timing. Continued disproportionate exploitation of early stocks diminishes the overall population diversity of Copper River Sockeye and Chinook Salmon and threatens food security for Copper River subsistence users, particularly those who fish upstream of the Gakona River in the uppermost portion of the Glennallen subdistrict.

The Council wants to emphasize that subsistence needs are not being met in the upper Copper River. Amounts necessary for subsistence (ANS) have only been met two years since 2006 for residents of the Gakona to Slana portion of the drainage (in 2014 and 2015). Commercial fishing must be limited until it is certain that the ANS and escapement goals that are established in State regulations and management plans are projected to be met. The commercial fishery must share in the burden of conservation to protect the future viability of these stocks and to ensure all users

can rely on this important resource for generations to come. Additionally, we regularly see the situation play out where Copper River salmon are harvested and sold commercially when subsistence harvest on those same stocks are limited or closed when they finally reach the upper river, which goes against the subsistence use priority.

The early runs of Chinook and Sockeye salmon in the Copper River go the furthest upstream to spawn. This is supported by both traditional ecological knowledge and by biological data. Allowing the first fish to pass upstream is a longstanding tradition of the Ahtna people who are the original stewards of this river and who understood the importance of getting those fish to the spawning grounds. The Council asks the BOF to take action to ensure that the current management plan is revised so that that harvest is more evenly distributed throughout the salmon runs, in an effort to protect stock diversity and provide for more equitable harvest opportunity among users of the resource.

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District

The Council **took no action on Proposal 52** and referenced their support and justification for proposal 51, which addresses similar issues.

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met

The Council took **no action on Proposal 53** and referenced their support and justification for proposal 51, which addresses similar issues.

The Council thanks you for the opportunity to comment on these proposals. 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,



Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
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