

Eastern Interior Alaska Subsistence Regional Advisory Council

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In Reply Refer To:
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October 15 2024

Art Nelson, Executive Director
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on two Agenda Change Requests (ACRs) that will be considered during the October 29-30, 2024, Board of Fisheries Work Session.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska 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 October 8-10, 2024, in Fairbanks. Among the items discussed were proposed Board of Fisheries ACRs. Please see Council comments below for ACRs 1 and 13.

ACR 1 - Remove restrictions on gillnet mesh-size and length in the subsistence fishery for non-salmon fish in non-flowing waters of the Yukon Area (5 AAC 01.220)

The Council **opposed ACR 1 on a unanimous vote and does not recommend that it be taken up out of cycle.** This ACR does not meet any of the criteria specified in 5 AAC 39.999. It actually goes against criteria (A) *fishery conservation purpose or reason* and would create further conservation concerns for Yukon Area fisheries. It does not address an immediate need

and therefore does not need to be taken up outside of the regular Arctic-Yukon-Kuskokwim meeting cycle.

ACR 13 - Reduce maximum depth of hand and purse seines, maximum length of leads, eliminate minimum length of leads, and allow leads to be attached to either end of a seine in the Alaska Peninsula Area commercial salmon fishery (5 AAC 09.332)

The Council **supported ACR 13 on a unanimous vote and recommends that it be taken up out of cycle.** This ACR meets the criteria outlined in 5 AAC 39.999. ACR 13 specifically meets criteria (A) *for a fishery conservation purpose or reason* and (C) *to correct an effect on a fishery that was unforeseen when a regulation was adopted.*

- For a fishery conservation purpose or reason – Returns of Chinook and fall Chum salmon to the Yukon River drainage have been at historical lows for the past several years. The U.S. has not been meeting escapement goals for Chinook or Fall Chum salmon as outlined in the Yukon River Salmon Agreement and Pacific Salmon Treaty. The cumulative passage of fall Chum Salmon at Eagle Sonar through October 18 is 16,275 fish. This estimate is the lowest on record (1980-2023) and well below the interim management escapement goal of 70,000-104,000 fall Chum Salmon. The Yukon River is experiencing an undeniable salmon crisis that has been acknowledged by all managing agencies and stakeholder groups, including by the Alaska Department of Fish and Game. There are no further conservation measures that can be taken within the Yukon River drainage for Chinook and fall chum salmon; subsistence, commercial, and sport fisheries have all been closed.

Therefore, additional conservation measures outside the drainage must be immediately put in place to help protect and rebuild these stocks. Arctic-Yukon-Kuskokwim (AYK) salmon stocks are intercepted in the Alaska Peninsula Area commercial salmon fishery. A reduction in AYK salmon interception during the South Unimak and Shumagin Islands June fishery can be achieved through the measures requested in ACR 13. Chinook and Chum salmon swim at lower depths than Sockeye and Pink salmon. A reduction in seine depth and length will allow more salmon to return to AYK drainages and contribute to rebuilding severely depleted stocks. Immediate action is required to protect AYK salmon and cannot wait until the next scheduled Alaska Peninsula/Bering Sea-Aleutian Island/Chignik Areas Finfish meeting.

- To correct an effect on a fishery that was unforeseen when a regulation was adopted – when seine net specifications and operations were adopted by the Board of Fish for the Alaska Peninsula Area (5 AAC 39.999) the effects to AYK salmon stocks were unforeseen. Genetic testing since that time has shown that AYK salmon are intercepted in Alaska Peninsula Area commercial salmon fisheries and cause a reduction in the number of AYK salmon that return to their natal streams to spawn. A change to gear

specifications and operations would help correct this effect by reducing interception of AYK salmon in Alaska Peninsula Area commercial salmon fisheries and help more salmon return to AYK drainages. These changes must be implemented as soon as possible to help rebuild depleted AYK salmon and cannot wait to the regularly scheduled Board of Fisheries meeting for the area.

The Council thanks you for the opportunity to comment on these ACRs. 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 cursive script that reads "Robert C. Wright, Sr." The signature is written in black ink on a white background.

Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council Members
Chair, Western Interior 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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