Eastern Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888
Toll-Free: 1-800-478-1456

In Reply Refer To:
OSM.B25001

JANUARY 30 2025

Elizabeth Phelps
Office of Ocean and Polar Affairs
Bureau of Oceans and International Environmental and Scientific Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Dear Ms. Phelps,

I write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to share the Council's concerns regarding international salmon hatchery releases and their competition with Alaskan wild salmon stocks in the Bering Sea.

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. Our members are appointed by the Secretary of the Interior with the concurrence of the Secretary of Agriculture. 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 October 8–10, 2024, in Fairbanks, during which we discussed the on-going crisis facing Western Alaska wild salmon stocks. The inability to harvest salmon for subsistence has created an extreme hardship for people living along the Yukon River, including communities within our region in the upper portion of the drainage. In recent years, returns of Yukon River salmon have been so low that spawning escapement goals, including U.S.-Canada border passage goals established in the Yukon River Salmon Agreement of the Pacific Salmon Treaty, have not been met and subsistence fishing has been closed. Factors affecting salmon are numerous and complex, and many of the issues facing our salmon are occurring in the marine environment in both domestic and international waters.

The Council writes to you because we are concerned about the impacts that the billons of hatchery salmon released by Asian nations and the Russian Federation are having on our wild Alaskan salmon in the Bering Sea (see enclosed Figures 1 and 2). In particular, we are concerned about the large releases of hatchery produced Chum Salmon (*Oncorhynchus keta*) that compete for resources with wild Western Alaska Chum Salmon stocks. The Council believes that the number of international hatchery salmon, especially Chum Salmon, released in the Bering Sea must be reduced in order to decrease competition with wild stocks and give Yukon River Chum Salmon stocks a greater chance to recover. The Council wants to emphasize the severity of the issue: in 2024, only 16,275 fall Chum Salmon were counted at Eagle Sonar on the Yukon River near the U.S.-Canada border. The escapement goal agreed to by both countries is 70,000–104,000 fish.

The Council is also severely concerned about the overproduction of hatchery Pink Salmon (*Oncorhynchus gorbuscha*) by all Pacific Rim nations, including the United States and Canada. The overproduction of hatchery Pink Salmon is having a tremendous negative impact on the carrying capacity of both the Gulf of Alaska and Bering Sea ecosystems. Because so many hatchery-produced salmon are being released, they are causing slower growth and reduced productivity of wild Chinook and Chum salmon. The vast majority of peer-reviewed research papers find conclusive evidence of these negative impacts, and the Council encourages the Office of Ocean and Polar Affairs and your colleagues to review the enclosed recent comprehensive studies to become more familiar with these issues (see enclosed).

Currently, hatchery produced Pink Salmon have the greatest impacts to our domestic wild stocks in the Gulf of Alaska. However, climate change studies indicate that as northern Bering Sea and Arctic Ocean waters continue to warm, species distributions are shifting further north. This northward shift will only bring more hatchery produced Pink and Chum salmon into the Bering Sea and further the negative impacts on the already struggling wild salmon that residents of the Yukon River depend on for subsistence. Pink Salmon hatchery releases must also be reduced, including releases by the State of Alaska.

The Council formally requests that the U.S. Department of State initiate talks with all Pacific Rim Nations through appropriate diplomatic processes on this very important issue that threatens the sustainability of our wild salmon. This is not an issue that can be addressed locally and requires engagement by high levels of government. We recognize the inherently slow process of international discussions and therefore urge this process to begin as soon as possible. The United States and Canada's Yukon River Chinook Salmon are already at near-extinction levels and fall Chum Salmon are at record lows. In Alaska, we have not been able to harvest the fish we need for food security and cultural traditions for the past five years.

The Council is also interested to learn more about how the Office of Ocean and Polar Affairs engages on international salmon issues in the Bering Sea and how the issue of international hatchery releases is being addressed. We extend an invitation for a representative from your office to educate the Council on these matters at one of our future biannual meetings and would greatly appreciate an opportunity for further discussions. The next two meetings are February 19-20, 2025 in Fairbanks, Alaska, and October 8-10, 2025 in Tok, Alaska.

The Council thanks you in advance for your consideration of our concerns and requests and invites you to share them with any appropriate colleagues. 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

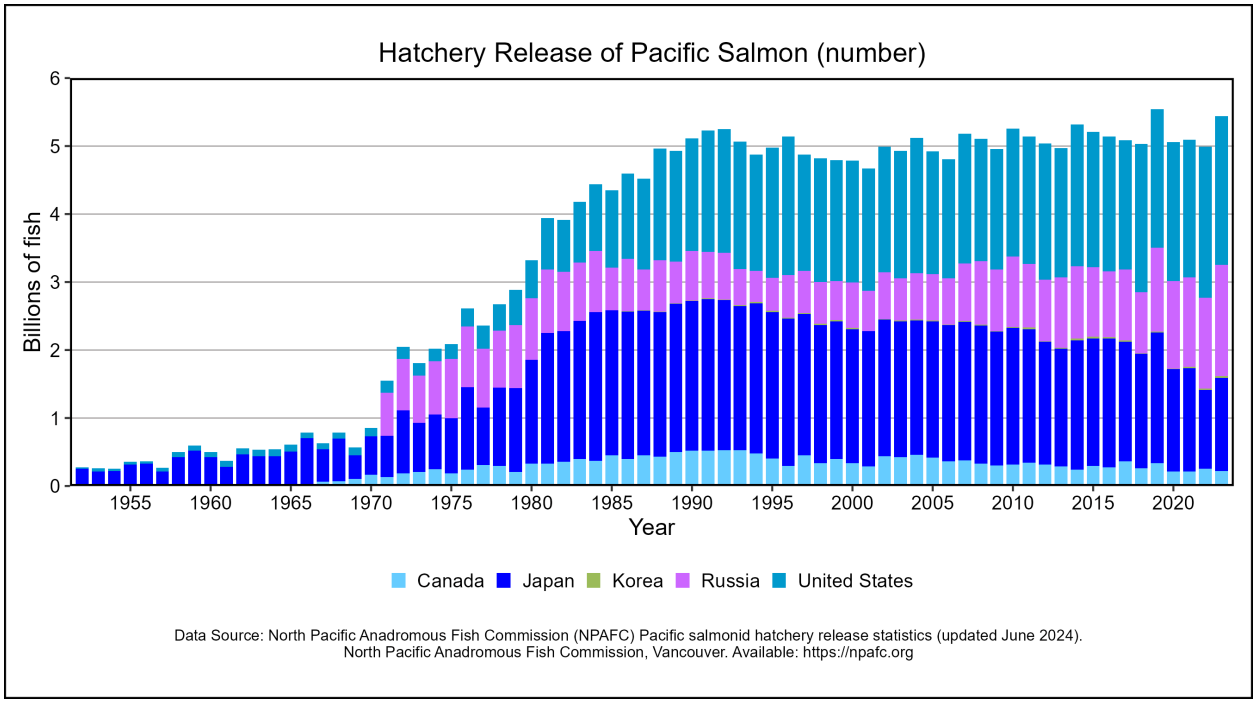
Enclosures

1. Ruggerone, G.T., et al (2023). From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems. Marine Ecology Progress Series 719:1–40. https://doi.org/10.3354/meps14402
2. McMillan, J.R., et al. (2023) A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids. Fisheries Management and Ecology, 30, 446–463. https://doi.org/10.1111/fme.12643

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, Assistant Director of Wildlife Conservation, Alaska Department of Fish and Game
Administrative Record

Enclosure

Figure 1. Numbers of Pacific Salmon released from hatcheries over time, by country.



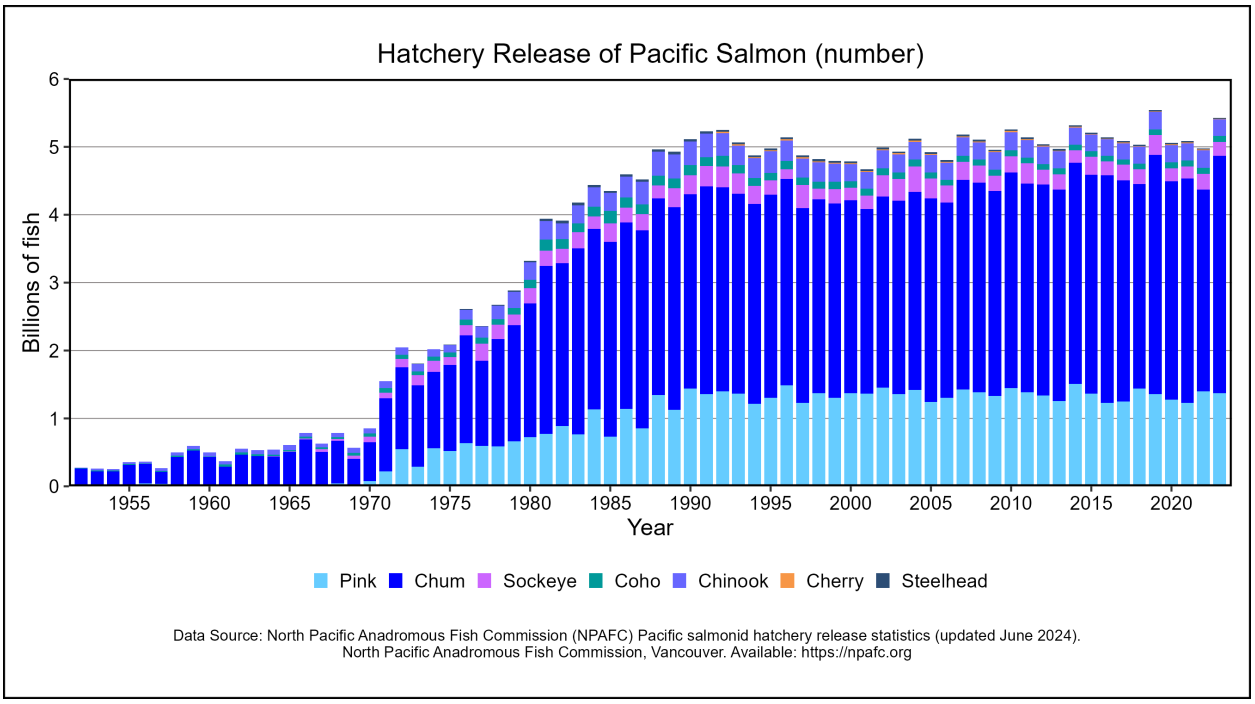


Figure 2. Numbers of Pacific Salmon released from hatcheries over time, by species.