

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

c/o Office of Subsistence Management

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In Reply Refer To:

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MARCH 03 2025

Anthony Christianson, Chair
Federal Subsistence Board
1011 E. Tudor Road
Anchorage, Alaska 99503

Gretchen Harrington, Assistant Regional Administrator
Alaska Regional Office Sustainable Fisheries Division
National Oceanic and Atmospheric Administration
P.O. Box 21668
Juneau Alaska 99802-1668

Doug Vincent-Lang, Commissioner
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, Alaska 99518-1599

Dear Sirs and Madam,

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to request that your agencies convene a joint meeting to initiate plans for cross-jurisdictional ecosystem-based management of salmon in the Arctic-Yukon-Kuskokwim region, to include the Bering Sea and Canadian portions of the ecosystem. The Council also asks that you elevate this request to the Secretaries of Interior, Agriculture, and Commerce, the U.S. Department of State, and the Alaska Congressional Delegation.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta 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 (FACA). 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 August 21-23, 2024, in Bethel. Among the items discussed was the on-going salmon crisis across our region and many other areas of the state, and its impact to subsistence users. Our Council remains very frustrated about the on-going lack of coordinated cross-jurisdictional conservation efforts and management planning because of its impacts on subsistence users. The lack of salmon for food and culture has been especially hurtful to Yukon River residents, who in many cases have faced restrictions on salmon fishing for over a decade and have not fished for salmon for five years. The current salmon management framework in Alaska uses invisible administrative boundaries to create a disjointed management system that fails both the resource and the users. The Council calls on our highest levels of government to intervene and change this framework. Salmon must be managed holistically across their marine and riverine environments and a coordinated plan to rebuild salmon stocks needs to be implemented immediately. All user groups must share equally in the burden of conservation.

The Council requests that the Federal Subsistence Board take the lead and convene a meeting with the National Marine Fisheries Service and Alaska Department of Fish and Game to discuss a path forward. We also request that Tribal Governments be meaningfully consulted and involved in any such meetings and in any new management framework to be developed. The salmon crisis requires immediate action, and we therefore ask that a meeting be convened before the start of the 2025 summer fishing season or as soon as possible this calendar year if that timeline is not feasible.

The current salmon crisis cannot be solved by participation in the siloed regulatory processes of the Federal Subsistence Board, North Pacific Fisheries Management Council, and Alaska Board of Fisheries. A higher-level forum for cross-jurisdictional salmon management must be established -- one that prioritizes conservation and subsistence over economic gain. Our Council recommends the Alaska Migratory Bird Co-Management Council (AMBCC) as a model framework for how cross-jurisdictional management can work effectively. We also continue to advocate for revisions to the Magnuson-Stevens Fishery Management Conservation Act to better prioritize conservation measures and subsistence uses.

Thank you in advance for considering our requests. Please direct your response and any questions through our Subsistence Council Coordinator, Brooke McDavid, at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Alissa Nadine Rogers
Acting Chair

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

Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
Seward Peninsula Subsistence Regional Advisory Council
Bristol Bay Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Diloola Erickson, Director, Tribal Resource Stewardship Division, Tanana Chiefs
Conference
Jennifer Hooper, Manager, Natural Resources Program, Association of Village Council
Presidents
Kevin Whitworth, Executive Director, Kuskokwim River Inter-Tribal Fish Commission
Acting Executive Director, Yukon River Inter-Tribal Fish Commission
Serena Fitka, Executive Director, Yukon River Drainage Fisheries Association
Yukon River Panel
Bristol Bay Native Association
Kawerak
Bering Sea Elders Group
Rural Alaska Community Action Program
Alaska Federation of Natives
Eagle Advisory Committee
Fairbanks Advisory Committee
Grayling, Anvik, Shageluk and Holy Cross Advisory Committee
Koyukuk River Advisory Committee
McGrath Advisory Committee
Middle Nenana River Advisory Committee
Middle Yukon Advisory Committee
Minto/Nenana Advisory Committee
Ruby Advisory Committee
Stony/Holitna Advisory Committee
Tanana/Rampart/Manley Advisory Committee
Upper Tanana/Fortymile Advisory Committee
Yukon Flats Advisory Committee
Bethel Advisory Committee
Central Bering Sea Advisory Committee
Central Kuskokwim Advisory Committee
Coastal Lower Yukon Advisory Committee
Lower Kuskokwim Advisory Committee
Mid-Lower Yukon Advisory Committee
Northern Norton Sound Advisory Committee
Southern Norton Sound Advisory Committee
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record