

**Yukon-Kuskokwim Delta 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  
RAC.B25013

FEBRUARY 13 2025

Angel Drobnica, Chair  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
L92 Building, 4th floor  
Anchorage, Alaska 99501

Dear Chair Drobnica:

I write to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Councils (Council) to convey the importance of halibut to the subsistence communities we represent and urge the North Pacific Fishery Management Council (NPFMC) to reduce halibut bycatch in Bering Sea commercial fisheries.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in 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. 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 were the impacts of bycatch in the Bering Sea-Aleutian Islands commercial fisheries to subsistence users. Our Council has written to your Council extensively about salmon bycatch, but we are also extremely concerned about the bycatch of halibut. Our Council raised the issue of halibut bycatch to your attention almost a decade ago (see enclosed). Since that time, the impacts of bycatch have only gotten worse. Residents of our region who live in or near coastal areas traditionally harvest and use halibut for subsistence. These fishers have noticed the continued decline in numbers and sizes of halibut that they rely on. This is happening at the same time that subsistence users are experiencing salmon and

caribou crises and having to rely more heavily on alternative subsistence foods such as halibut.

The Council strongly urges the NPFMC to take action to reduce halibut bycatch in Bering Sea-Aleutian Islands commercial fisheries. We are concerned that if no action is taken, halibut are going to face a crisis like our salmon. The Council recommends a reduction in the total allowable catch for pollock as a way to reduce the bycatch of halibut and other prohibited catch species such as salmon.

The Council invites the NPFMC to present to the Council about halibut bycatch at a future meeting. Arrangements can be made through our Coordinator.

Thank you for considering our comments on halibut bycatch. 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](mailto:brooke_mcdavid@ios.doi.gov).

Sincerely,



Alissa Nadine Rogers  
Acting Chair

Enclosure

cc: Federal Subsistence Board

Yukon-Kuskokwim Delta 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

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o U.S. Fish and Wildlife Service  
Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503

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**MAR 29 2016**

Mr. Dan Hull, Chair  
North Pacific Fishery Management Council  
P.O. Box 100498  
Anchorage, Alaska 99501

Dear Chairman Hull:

I am writing on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments and recommendations on halibut bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial fishery. This letter is for consideration by the North Pacific Fisheries Management Council (NPFMC) under agenda items C6, C7, and C8 at the upcoming April 2016 meeting in Anchorage, Alaska. Due to budget constraints, a representative from the Council will not be able to testify in person. We are writing this letter to convey the importance of halibut to the subsistence communities we represent and urge the NPFMC to continue to make efforts to significantly reduce the halibut bycatch in the Bering Sea trawl fisheries and mitigate the impacts this bycatch has had to our communities.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Yukon and Kuskokwim Rivers as well as coastal and island communities in the region. The Council 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 establish its 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 the region 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 recently participated in an All Council meeting in Anchorage the week of March 7-11, 2016, and received a presentation and update on Bering Sea salmon bycatch provided by NPMC during a joint session of the ten Federal Subsistence Regional Advisory Councils on March 7. The Council held its own public meeting session on March 9 regarding various subsistence issues in our region. The Council continues to be very concerned with Chinook and Chum Salmon bycatch on the Bering Sea and remains engaged this issue for

subsistence users who depend on this resource for nutritional and cultural survival in our region. Additionally, many communities in the Yukon-Kuskokwim Delta Region located on the coast have fished for halibut for generations and rely on halibut for subsistence as an integral part of their subsistence way of life. Council members who live on Nunivak and Nelson Islands have experienced hardship over the last five years with declining subsistence halibut catch in areas where it used to be abundant. The Council urges that halibut bycatch in the Bering Sea trawl fisheries be significantly reduced in order to protect this important subsistence food that has sustained many of the coastal communities in the region.

The Council would like to revisit the discussion we had with representatives from the NPFMC, on February 25-26, 2015 in Bethel. We greatly appreciated the NPFMC meeting with us in person and were encouraged to hear of the new initiatives to reduce the Bering Sea halibut bycatch by 50 percent. However, low abundance of halibut has still been an ongoing issue for our communities and we wish to reiterate those observations and concerns for your consideration on Bering Sea halibut bycatch at the April 11-12, 2016 NPFMC meeting. Council member Dale Smith of Mekoryuk relayed that the community is having to travel further and further and are catching fewer halibut. Council member David Bill, Sr. of Toksook Bay, who has been a halibut fisherman since 1978, also relayed his experience of dramatic declines in the halibut in the last four years in Etolin Strait and has to move to another area to find fish. In areas where he used to fish in deep waters, there are no longer halibut and he has had to move to shallower channel waters to find any halibut. Overall communities are greatly concerned about the bottom trawl fisheries in Kuskokwim Bay as well and the community of Kipnuk has observed dead halibut floating that were discarded as bycatch.

We appreciate the ongoing efforts to limit bycatch in the Bering Sea Pollock fishery, but urge the NPFMC to recognize the importance of halibut to our subsistence communities and take further action to significantly reduce halibut bycatch. The Council requests a report back from the NPFMC on this issue and we invite you to provide this update at our fall meeting to be held in Bethel on October 12-13, 2016.

Thank you for the opportunity to dialogue with the NPFMC. We look forward to continuing discussion about the issues and concerns of subsistence users of the Yukon-Kuskokwim Delta Region. If you have questions about this letter, please contact me via Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3358.

Sincerely,



**Lester Wilde, Sr.**  
Chair

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management  
Stewart Cogswell, Acting Deputy Assistant Regional Director,  
Office of Subsistence Management  
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management  
Donald Rivard, Fisheries Biologist, Office of Subsistence Management  
George Pappas, State Liaison, Office of Subsistence Management  
Drew Crawford, Federal Subsistence Liaison Program,  
Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record