

**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, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
OSM.B25002

JANUARY 27 2025

Märit Carlson-Van Dort, Chair  
Alaska 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 write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to share the Council's concerns regarding salmon hatchery releases and competition with wild salmon stocks.

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 salmon. Yukon River Chinook Salmon are at near-extinction levels and fall Chum Salmon are at the lowest levels ever recorded. 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. We have not been able to harvest the fish we need for food security and cultural traditions for the past five years.

Factors affecting salmon are numerous and complex. Reducing hatchery releases is one feasible action that can help to give our wild salmon a better chance of rebuilding. The overproduction of

hatchery salmon is having tremendous negative impacts on the carrying capacity of both the Gulf of Alaska and Bering Sea ecosystems. The large numbers of hatchery-produced salmon that are being released are resulting in 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 (see enclosed). For example, McMillan et al. 2023 highlight that 83% of peer-reviewed publications since 1970 (approximately 171 publication total) indicate some degree of adverse impact of hatchery salmon on wild salmon. We urge the Alaska Board of Fisheries to take actions which are based on this objective research and reduce the egg take for hatchery production.

The Council thanks you for considering our concerns and request. 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,

A handwritten signature in black ink that reads "Robert C. Wright, Sr." in a cursive script.

Robert "Charlie" Wright, Sr.  
Chair

Enclosures

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  
Administrative Record