

Eastern Interior Alaska Subsistence Regional Advisory Council

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In Reply Refer To:
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Holly Carroll
Yukon Area Federal Subsistence Fisheries Manager
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, Alaska 99503

Ben Mulligan
Deputy Commissioner
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518

Dear Ms. Carroll and Mr. Mulligan,

I write to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) regarding concerns and recommendations for Yukon River salmon management.

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 held a public meeting October 8-10, 2024, in Fairbanks, during which the Council discussed Yukon River salmon management. The on-going salmon crisis in the Yukon River remains a top concern for the Council and we have been advocating for an ecosystem-based conservation approach that includes both in-river and marine fisheries to help rebuild Chinook, Chum, and Coho salmon stocks. Although the Council feels that a broader inter-jurisdictional approach to salmon management is necessary, we understand that the current system is not set-up to facilitate this. We urge you to keep working with your counterparts across Federal-State and riverine-marine boundaries, and we thank you for on-going efforts you put into salmon management and research during this difficult time.

The Council would like to share concerns and recommendations with you in your role as

managers of subsistence and commercial fisheries on the Yukon River. The Council is particularly concerned about fall Chum Salmon due to its recent record low returns and escapements and its importance as a subsistence resource in the upper river region. The Council feels that more needs to be done to protect fall Chum Salmon, starting as soon as they are detected in the mixed-stock of summer and fall Chum entering the river. The Council supports utilization of summer Chum Salmon by people in the lower and middle river, whenever those fish have a harvestable surplus and are in edible condition. But once fall Chum Salmon are detected, managers must shut down summer Chum Salmon fishing and make strong efforts to get every fall Chum Salmon to the spawning grounds and help rebuild these vital stocks. If fall Chum Salmon numbers rebuild in future years and allow for harvest opportunity, then the Council suggests that fall Chum Salmon fishing opportunities should be primarily dedicated for the upper river communities that do not have access to other species of salmon available in the lower river.

The Council would also like to see more precise regulatory guidance about where four-inch mesh nets can be used to fish for nonsalmon during times that salmon are running. Current directions to avoid placing four-inch nets where salmon run are too vague. There are techniques and locations where people can fish with four-inch mesh without intercepting salmon. We feel that it is necessary to educate people on these techniques and create regulations that allow for continued active participation in nonsalmon fisheries without doing harm to the salmon everyone is trying to rebuild. Perhaps a group of fishers from various parts of the river could come together to help develop more precise guidance; we have Council members who would be willing to assist.

Additionally, the Council kindly requests that your agencies work collaboratively to begin pursuing formal co-management agreements with the Yukon River Inter-Tribal Fish Commission. The inclusion of Tribal voices into management is critical and Tribes deserve an equal seat at the decision-making table. Initial planning discussions can start while the Fish Commission continues to grow their capacity. Much can be learned from the Kuskokwim River model that can be applied in a way that fits the unique aspects of the Yukon River system.

The Council thanks you for the opportunity to share our concerns and recommendations. Please distribute this letter as appropriate. 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

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee

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