Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management 1011 East Tudor Road, MS 121 Anchorage, Alaska 99503-6199 Phone: (907) 787-3888, Fax: (907) 786-3898 Toll Free: 1-800-478-1456

In Reply Refer To: OSM.B25041

JUNE 05 2025

Hannah Lindoff Executive Director SeaShare 222 Seward St., Suite 200 Juneau, Alaska 99801

Dear Director Lindoff,

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior 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 October 2–3, 2024, in Galena. Among other topics discussed at the meeting, the overarching issue raised by all Council members throughout the meeting was continued concern over the lack of salmon returning to the Yukon and Kuskokwim drainages. There are not enough Chinook or Chum salmon to meet subsistence needs of those that reside on the river, much less enough to meet escapement goals for the continuation of these species that return to their spawning waters. While subsistence users in our region are extremely restricted or outright prohibited from fishing, marine commercial fishing operations continue to catch salmon bound for these rivers as bycatch or in intercept fisheries. Management agencies have implemented few effective changes to ensure that industry is sharing the burden of conservation for these species.

The Council would like to commend your nonprofit for its mission, for ensuring that commercial fishermen donate seafood incidentally caught so it can be used for human consumption. The

Council would also like to recognize that this endeavor requires extensive funds and an intricate framework to carry out the mission.

Through organizations like yours, the seafood industry has an opportunity to donate fish incidentally harvested as bycatch to food banks and feeding centers across the country instead of discarding it back into the ocean. However, we would like to highlight, the seafood SeaShare distributes across the country includes salmon destined to return to the Yukon and Kuskokwim drainages. Subsistence users in Alaska relied on this resource for time immemorial now face empty fish camps, smokehouses, pantries and freezers. The unavailability of this traditional food creates food insecurity and an increase of chronic diseases brought on by consumption of more readily available processed foods.

The Council fully recognizes that SeaShare is not involved in management of these resources but is only acting to ensure that these ocean resources are not wasted, which is highly commendable. However, your organization could assist the subsistence users in the Yukon and Kuskokwim drainages in another way. We kindly request SeaShare make it a priority to facilitate the return of commercially caught salmon that are known to contain salmon of Western Alaskan origins back to the people of these rivers for distribution. Prioritizing the return of properly handled salmon to the subsistence users of these rivers will help meet some of our nutritional needs and allow a portion of our culture to continue to occur and to be passed down to the next generation when we are relegated to sitting on the banks of the river in the summer instead of joining together at fish camp.

Thank you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or <u>nissa_pilcher@ios.doi.gov</u>.

Sincerely,

sill Kecks Jack Reakoff

Chair

cc: Federal Subsistence Board Interagency Staff Committee Western Interior Subsistence Regional Advisory Council Office of Subsistence Management Administrative Record