

**Western Interior Alaska and Eastern Interior Alaska
Subsistence Regional Advisory Councils**
c/o Office of Subsistence Management
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In Reply Refer To
OSM.R26002

January 20 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,

We write to you on behalf of the Western Interior Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Alaska Peninsula/Aleutian Island/Chignik and Statewide Finfish Meetings.

The Councils represent subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Interior Alaska. They were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charters establishes the Councils' 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 Councils also review resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Councils. The Councils provide public forums for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within their regions.

The Councils held a joint public meeting October 17, 2025, in Fairbanks and voted to submit the following comments.

Alaska Peninsula/Aleutian Island/Chignik Meeting

The Councils **support proposals 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, and 148**. These proposals seek to implement Chinook and Chum salmon savings measures in commercial fisheries that intercept Arctic-Yukon-Kuskokwim bound salmon. Escapement goals for Chinook and fall Chum salmon are not being met on the Yukon River. Yukon River salmon stocks need to be protected across their entire range, not just in-river, or else we risk losing these stocks forever. Every

salmon counts in an effort to rebuild runs. Subsistence fishers have been long been bearing the burden of conservation, and the subsistence priority is not being upheld. These proposals will help distribute a small amount of that burden by reducing interception in commercial fisheries.

Statewide Meeting

The Councils **support proposals 163, 164, and 165**. Efforts to better regulate trawl fisheries are long overdue. These proposals will do that by helping to clarify definitions, setting standards for monitoring, reducing bottom contact and subsequent habitat destruction, and requiring the use of salmon excluders as is done in other fisheries to reduce salmon bycatch.

The Councils **support proposals 170 and 172** that seek to reduce egg take and overall hatchery production. A growing body of scientific evidence shows that hatchery salmon compete with wild salmon for resources and impact the diet, growth, fecundity, productivity, and abundance of wild salmon and other species in the marine environment. The State of Alaska needs to reduce hatchery production so that our struggling wild salmon stocks have a better chance at health and survival. Not only does this need to be done domestically, but State and Federal governments must also collaborate with other nations to reduce international hatchery production throughout the north Pacific Ocean.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our respective Subsistence Council Coordinators: Brooke McDavid (Eastern Interior), at (907) 891-9181 or brooke_mcdavid@ios.doi.gov or Nissa Pilcher (Western Interior), at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair, Western Interior



Robert "Charlie" Wright, Sr.
Chair, Eastern Interior

cc: Federal Subsistence Board
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
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