

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

In Reply Refer To
OSM.R26011

FEBRUARY 03 2026

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 Yukon-Kuskokwim Delta Subsistence Regional Advisory Councils (Council) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Alaska Peninsula/Aleutian Island/Chignik finfish meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Interior Alaska. 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 region that may impact subsistence resources critical to communities served by the Council.

The Councils held a public meeting January 20-22, 2026, in Bethel and voted to submit the following comments:

Proposal 136 - SUPPORT

The Council supports proposal 136 as their first priority among the proposals seeking to amend the South Alaska Peninsula Salmon June Management Plan. Large numbers of Arctic-Yukon-Kuskokwim (AYK) salmon are intercepted and harvested in the South Alaska Peninsula (Area M) commercial salmon fisheries. This is documented by genetic studies. This interception prevents AYK salmon from returning to their home rivers, such as the Yukon, where subsistence salmon fishing continues to be closed and where spawning escapement goals are not being met. The Council supports closing the June Area M fishery because commercial fisheries should be closed before subsistence fisheries. The subsistence priority is not being followed. Subsistence fishers in Western and Interior Alaska continue to bear the burden of conservation. Proposal 136 would offer the most protection for both Chum and Chinook salmon by allowing the greatest number of fish to pass

through Area M without interception. The Council requests that the Board adopt this proposal to help rebuild AYK salmon stocks and abide by the subsistence priority. Salmon should be managed on an ecosystem scale and the Board must recognize that what happens in Area M has significant impacts to AYK salmon and subsistence users.

Proposal 131 – SUPPORT

The Council supports proposal 131 as their second priority among the proposals seeking to amend the South Alaska Peninsula Salmon June Management Plan. The Council prefers Proposal 136 because it would offer more protection for AYK salmon stocks, but Proposal 131 offers the next highest level of protection by closing the Area M fisheries for 12 consecutive days during the time period when the peak of AYK salmon interception has historically occurred. Please reference the above comments on Proposal 136 for justification.

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 Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Jaqueline Cleveland
Chair

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
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and
Game
Administrative Record