

Seward Peninsula Subsistence Regional Advisory Council

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In Reply Refer To:
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SEPTEMBER 30 2025

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

On behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council), I am submitting the Council's comments on a Board of Fisheries (BOF) proposal that will be considered at the upcoming 2025 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on federal public lands and waters in the Seward Peninsula 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 April 1, 2025, via teleconference. Among the items discussed were proposals submitted to the AYK BOF meeting. While the Council did not submit a proposal, Proposal 32 – 5 AAC 01.160 Fishing Seasons and Periods, supports the Councils' discussion to improve access to salmon in our region. Residents of Norton Sound-Port Clarence Area have a customary and traditional use of salmon, and while this proposal does not occur in federal public waters, it does have implications for nearby subsistence users to gain additional access to salmon during inclement weather under state regulations. For that reason, the Council wanted to make the BOF aware of our position.

Proposal 32: 5 AAC 01.160. Fishing Seasons and Periods

The Council **unanimously** voted to **support Proposal 32**, to repeal the subsistence fishing schedule in the west of Cape Nome in Subdistrict 1 of the Norton Sound District. The Council emphasized that unfavorable, rapidly changing weather limits subsistence fishing opportunities during the current season and that the current schedule further limits subsistence opportunities for salmon fishers in these waters. The Council also noted that wet weather conditions also present additional challenges to process and preserve fish after harvest. The Council agreed that allowing for additional fishing time should not pose a conservation concern, stating that salmon are available for harvest, but inclement weather is one of the main factors limiting access to subsistence fishing under the current schedule.

The Council appreciates the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact the Subsistence Council Coordinator, Gisela Chapa, at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,



Louis H. Green
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Seward Peninsula Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Fish and Game Coordinator, Division of Wildlife Conservation, Alaska
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Administrative Record