Eastern Interior Alaska 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
R26080

OCT 13 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 Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on Agenda Change Requests being considered at the upcoming Alaska Board of Fisheries Work Session. During our October 13-15, 2026 meeting in Fort Yukon, we voted to submit Council comments as noted below.

The Council voted unanimously that the following ACRs **should be taken up out of cycle for conservation** reasons in alignment with the criteria specified in 5 AAC 39.999.

- **ACR 2 - Specify escapement objectives that must be met prior to opening the Copper River District to commercial fishing for salmon**

There are conservation concerns for Chinook Salmon in the Copper River. Additionally, in-river subsistence harvests have required in-season emergency restrictions and closures in attempts to meet escapement goals. Commercial fishing needs to be delayed until Miles Lake sonar counts indicate that objectives are being met.

- **ACR 3 - Reduce statewide private nonprofit salmon hatchery egg-take capacity to less than 100 million eggs annually**

The extreme excess of hatchery releases is disrupting food webs in the marine environment and leading to competition with wild salmon stocks. This is a major conservation concern and needs to be addressed immediately given the poor returns of Chinook and Chum Salmon across the State, especially the Yukon River. 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 immediately so that our struggling wild salmon stocks have a better chance at health and survival.

- **ACR 7 – Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet gear in the South Unimak and Shumagin Islands June Salmon Management Plan**
- **ACR 8 – Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula**
- **ACR 9 – Reduce maximum gillnet depth in the Alaska Peninsula Area to 70 meshes**
- **ACR 10 – Amend Alaska Peninsula Area seine specification to reduce net size**
- **ACR 11 – Prohibit discard of Chinook salmon caught in purse seine gear in the Alaska Peninsula and Chignik areas**

These ACRs seek to re-visit actions that were already taken by the Board of Fisheries but were never implemented. They are urgently needed actions for conservation purposes. Actions on these requests would allow more salmon to return to Western Alaska streams to spawn and aid in the rebuilding of struggling stocks, many of which have not been meeting escapement goals or subsistence needs for quite some time. Preliminary 2026 monitoring data indicates that Chinook and Fall Chum salmon escapement goals into Canada will not be met, and many US tributary goals were not met as well. Subsistence fishing on the Yukon was closed for Chinook Salmon and heavily restricted for Chum Salmon. The voiding of proposals 127, 135, 141, 147, and 148 removed hard fought protections for Western Alaska salmon and led to an increase in the interception of Chum Salmon in the commercial intercept fishery in 2026. Immediate action is needed to restore these protections and require the burden of conservation to be shared by the commercial industry.

- **ACR 13 – Establish a statewide Chinook retention and disposition reporting standard for commercial salmon fisheries**

Action on this ACR is needed to fill data gaps about exploitation rates of Chinook Salmon. Chinook Salmon all over Alaska are in varying stages of critical loss. If this action is implemented, the additional data would lead to more informed fisheries management and Chinook Salmon conservation.

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,

Robert C Wright Sr

Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska 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