Western Interior Alaska Subsistence Regional Advisory Council
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In Reply Refer To
R26081

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 Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on Agenda Change Requests (ACRs) being considered at the upcoming Alaska Board of Fisheries (BOF) Work Session. During our October 6-7, 2026, meeting in Fairbanks, 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. Additional comments will be submitted to the appropriate meeting when these requests are accepted for further deliberation by the BOF.

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

The State of Alaska is required to manage all wild stocks, including salmon, according to the sustained-yield principle and is obligated to maintain their health and long-term viability.
A growing body of scientific evidence indicates that hatchery-reared salmon compete with wild salmon for resources and affects the diet, growth, fecundity, productivity, and abundance of wild salmon and other marine species. Hatchery production should; therefore, be reduced to improve the prospects for the health and survival of vulnerable wild salmon stocks.

- **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**

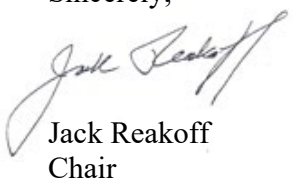
These ACRs ask that the BOF revisit actions it previously approved but never implemented, which are now necessary to address critical conservation needs. Action on these ARCs would allow more salmon to return to their natal streams in Western Alaska, of which many stocks are not meeting subsistence needs, escapement goals, and in the case of the Yukon River, Treaty promises made to Canada.

- **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 actual exploitation rates of Chinook Salmon in these fisheries. There are few, if any, healthy Chinook Salmon populations remaining in Alaska, and better harvest data would support more informed fisheries management decisions.

Thank you for considering our comments on the above ACRs. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Nissa Pilcher, at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff
Chair

cc: Federal Subsistence Board
Western 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