



Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503 - 6199



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

SEPT 30 2022

In Reply Refer To
OSM 22110.RL

Honorable Thomas J. Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
Office of the Secretary
1400 Independence Avenue, Southwest
Washington, DC 20250

Honorable Debra Haaland
Secretary of the Interior
U.S. Department of the Interior
Office of the Secretary
1849 C Street, Northwest
Washington, DC 20240

Dear Secretaries Vilsack and Haaland:

The Federal Subsistence Board (Board) is writing to inform you of concerns about the well-being of the residents of a large number of rural communities in western Alaska. These concerns have been raised by four of the ten Federal Subsistence Regional Advisory Councils (Councils). They are the Eastern Interior, Western Interior, Yukon-Kuskokwim Delta, and the Seward Peninsula Subsistence Regional Advisory Councils, and combined they represent an area slightly larger than Texas.

During their winter 2022 meetings, these four Councils elected to write a joint letter to the North Pacific Fishery Management Council (NPFMC) to request significant reductions in Chinook and chum salmon bycatch in the Bering Sea Aleutian Islands (BSAI) commercial fishery and to request subsistence or Tribal representation on the NPFMC. The Councils contacted this Board requesting these issues be elevated to the Secretaries. In addition, they are asking for the National Marine Fisheries Service (NMFS) to use emergency rule authority to reduce or set hard caps on salmon bycatch in the BSAI offshore pollock pelagic trawl fishery. A copy of the Councils' letter to the Board is enclosed for your reference.

The ability to act on this issue is beyond the scope and authority granted to the Board. Our role is one of reporting and facilitating communications, in this case, informing you of the concerns and issues raised by our Councils. The Board has previously addressed the issue of by-catch and the need for subsistence users to have representation on the NPFMC with the Departments.

In summary, the Councils' issues and requested actions to the NPFMC and the Board are:

- Immediately reduce the BSAI Chinook salmon bycatch to no more than 16,000 fish and further reduce to a maximum of 10,000 fish within one year

- Immediately implement a chum salmon bycatch hard cap of 250,000 fish and further reduce to 150,000 fish within one year
- Require 24/7 video monitoring coverage on all trawl fishing vessels
- Add two subsistence or tribal representative seats to the NPFMC. Require that these representatives have no direct economic ties to Alaskan Commercial Development Quota fisheries

The Councils requested the Board to address the following:

- Elevate the concerns expressed in the joint Councils letter to the NPFMC to the Secretaries of the Departments of Agriculture, Interior, and Commerce
- Petition NMFS to use emergency rule authority to reduce or set hard caps on salmon bycatch in the BSAI fisheries

Pursuant to Title VIII of the Alaska National Interest Land Conservation Act, the Board is mandated to accord a priority for rural Alaskans engaging in subsistence uses on public lands. Due to record-low salmon returns and the need to protect the continued viability of wild salmon populations on the Yukon and Kuskokwim rivers, the subsistence harvest of salmon has been severely curtailed over the last several years. This has caused severe hardship on rural subsistence users who have a customary and direct dependence upon the salmon populations as the mainstay of their livelihood. Many Alaskans, including the Councils, have opined that it is inequitable for commercial fishers in marine waters to harvest salmon bound for Arctic Yukon Kuskokwim drainages when subsistence fishing in those river systems by those who need it most is completely or severely restricted. Accordingly, the Board respectfully requests for you to liaise with the Department of Commerce to explore engagement and relationship building between our agencies with the goal of addressing salmon migratory life cycles and bycatch holistically. In addition, the Board plans to invite NPFMC members and staff to its next meeting in January 2023 to discuss this issue.

We thank you for your consideration of this important issue and look forward to hearing from you. This is a matter of utmost importance to the many Alaskans who depend on Chinook and chum salmon for their health, well-being, and cultural existence.

Sincerely,



Anthony Christianson
Chair

Enclosure

Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
 Jack Reakoff, Chair, Western Interior Alaska Subsistence Regional Advisory Council
 Ray Oney, Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
 Sue Entsminger, Chair, Eastern Interior Alaska Subsistence Regional
 Louis Green, Chair, Seward Peninsula Subsistence Regional Advisory Council
 Interagency Staff Committee
 Administrative Record