

# Public Comments

Special Meeting – Proposal 173 | April 19, 2023

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PC1

**Name:** Fairbanks AC

**Community of Residence:** Fairbanks, AK

**Comment:**

Fairbanks Fish and Game Advisory Committee (Fairbanks AC)

Comment on Proposal 173

The FAC supports Proposal #173 and the village of Kwinhagak in their efforts to conserve salmon and still support a local commercial and subsistence fishery. Reducing fishing time and restricting gear should result in short windows of time and enhance escapement. We commend the Village of Kwinhagak for considering subsistence needs and matching time and gear restrictions and including all the detail in #173 which would result in conservation. The Board should pass this proposal as presented or request the Department add these changes in lawful gear specifications and operations and time limits to the management plan.

Gale K. Vick

Fairbanks Fish and Game Advisory Committee, Chair of Fisheries Sub-Committee



April 7, 2023

*Submitted electronically via [adfg.alaska.gov](http://adfg.alaska.gov) and  
email to [art.nelson@alaska.gov](mailto:art.nelson@alaska.gov)*

Alaska Board of Fisheries  
c/o Art Nelson, Executive Director  
[art.nelson@alaska.gov](mailto:art.nelson@alaska.gov)

Re: Native Village of Kwinhagak's Letter Supporting Proposal 173

To the Members of the Alaska Board of Fisheries:

The Native Village of Kwinhagak ("NVK" or the "Tribe"), a federally recognized tribe located at the mouth of the Kuskokwim, Arolik, and Kanektok Rivers in District 4 of the Kuskokwim Management Area ("KMA"), supports Proposal 173 and urges the Board to adopt the proposal as written in order to conserve chinook and chum salmon to ensure future uses of these resources.

Salmon—in particular, chinook and chum salmon—form the backbone of NVK's cultural and nutritional identity. For thousands of years, NVK and its tribal citizens have depended upon the abundance of chinook and chum salmon stocks to meet their customary and traditional subsistence needs. NVK also depends upon these stocks to support a small commercial fishery in the Kuskokwim Bay. Recent chinook and chum stock declines implicate both NVK's subsistence and commercial interests. Failure to conserve these species will result in the extinguishment of these interests and create profound hardship not only for NVK, but also for other people throughout the Kuskokwim watershed who depend upon harvesting salmon resources in District 4 for economic, nutritional, and cultural security.

If adopted, Proposal 173 will preserve the viability of chinook and chum salmon stocks and ensure the ability of NVK's tribal citizens to continue participating in subsistence and commercial fisheries in District 4. As a result of years of in-river subsistence fishery closures prompted by conservation concerns for chinook salmon, subsistence fishing efforts of other KMA residents have been redirected from in-river fisheries further up the Kuskokwim River to subsistence fisheries within the Kuskokwim Bay in District 4. This increased pressure is most noticeable during weekends in June and early July, when people travel by boat to District 4 to engage in two to three interrupted days of subsistence fishing. Under current regulations, each person within a boat is authorized to deploy their own gillnet from that boat—a practice that is distinctly different from the local custom of deploying one net per boat. Both of these factors cause an increase in harvest pressure upon chinook and chum salmon stocks escaping up the Kuskokwim River and the Kanektok River. The lack of a weir on the Kanektok River since 2015 is additionally concerning, as NVK lacks a method to gauge the effect of this increased harvest pressure on the Kanektok River's salmon stocks.



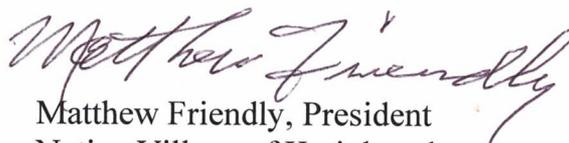
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Proposal 173 offers two simple yet effective changes to 5 AAC 01.270 and 5 AAC 07.331 that will address chinook and chum conservation concerns in a time of low abundance. By closing commercial and subsistence fisheries on Sundays between June 1 and July 15—dates which coincide with the height of the chinook salmon run—and by implementing a limitation of one gillnet per boat in District 4, the Board will reduce harvest pressure placed on chinook and chum salmon stocks by both subsistence and commercial fisheries and allow additional windows for those stocks to escape to spawning grounds within the Kuskokwim and Kanektok watersheds. The Board will also be limiting harvest in a way that honors and reflects traditional local fishing practices. The duration of the proposed Sunday fishery moratorium is reasonable and will not interfere with KMA residents' ability to access other fishery resources that return to the Kuskokwim and Kanektok Rivers in greater abundance later in the season, like sockeye or coho salmon. It also does not prevent KMA residents' ability to access other subsistence resources located within District 4.

KMA residents routinely rely on and share resources from a multitude of locations throughout the river's watershed. NVK and its tribal citizens are no exception, as they routinely harvest marine mammals, timber, and other subsistence resources from a variety of locations outside of District 4. However, during a time of resource scarcity, NVK strongly believes in the importance of implementing reasonable conservation measures that ensure the sustainability of important resources. NVK acknowledges that the changes offered by Proposal 173 may temporarily reduce subsistence opportunities for subsistence users, including its own tribal citizens. However, all KMA residents, including NVK's tribal citizens, have voluntarily reduced their own subsistence opportunities for years in an effort to protect and help rebuild chinook and chum stocks. The conservation measures proposed by Proposal 173 complement those voluntary efforts.

Proposal 173 offers a reasonable and effective way to balance subsistence needs against the need to sustain a crucial resource. NVK urges the Board to adopt the proposal as written. Thank you for your consideration, and please do not hesitate to contact me if you have additional questions.

Sincerely,

  
Matthew Friendly, President  
Native Village of Kwinhagak



# United States Department of the Interior

Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199



PC3  
1 of 1

IN REPLY REFER TO:  
OSM.23032.JK

APR 7 2023

Ms. 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:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on Proposal 173, which will be considered at the Alaska Board of Fisheries meeting on April 19.

The OSM staff reviewed Proposal 173 and has no comment to provide at this time.

We appreciate the opportunity to participate in the process for these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Sue Detwiler  
Assistant Regional Director  
Office of Subsistence Management

cc: Federal Subsistence Board  
Interagency Staff Committee  
Benjamin Mulligan, Alaska Department of Fish and Game  
Art Nelson, Alaska Department of Fish and Game  
Mark Burch, Alaska Department of Fish and Game  
Administrative Record



PC4

**Name:** Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (YKDRAC)

**Community of Residence:** Fairbanks

**Comment:** The Yukon-Kuskokwim Delta Subsistence Regional Advisory Council voted to unanimously support Proposal 173 at their public meeting April 5, 2023. The Council supports this proposal because there have been record low returns for Chinook and Chum Salmon in the Kuskokwim Management Area, and residents of Quinhagak have been observing low returns of these species in the Kanetok River. The Council agrees that only one net per boat should be allowed because conservation measures are needed to help rebuild salmon stocks.