



January 9, 2023

Märit Carlson-Van Dort, Chair  
 Alaska Board of Fisheries  
 PO Box 115525  
 Juneau, Alaska 99811-5525

**RE: 2023 AYK Board of Fisheries Proposal Comments**

Dear Chairperson Carlson-Van Dort:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) is an inter-Tribal agency serving the 33 Federally recognized Tribes of the Kuskokwim River watershed. KRITFC represents our Tribes in fisheries management, research, and monitoring, and works to protect and sustain our Kuskokwim salmon fisheries and traditional ways of life using both Indigenous Knowledge and the best available Western science.

Since 2015, KRITFC has brought a precautionary approach to the fisheries management table to ensure that our descendants can rely on an abundance of fish for their families. We are committed to keeping our fishing traditions alive for generations to come, especially through our collaborative management with the U.S. Fish and Wildlife Service, Yukon Delta National Wildlife Refuge. Currently, our subsistence-dependent communities are suffering through a multi-year, multi-species salmon collapse with resounding negative impacts on our food security, escapement goal attainment, and way of life. Please see our 2022 Kuskokwim River Salmon Situation Report for more information about the Chinook, chum, and coho salmon crisis on our river, available on our website at <https://www.kuskosalmon.org/documents>.

The KRITFC Executive Council met on December 15, 2022, to review AYK BOF regulatory change proposals and develop positions on proposals. KRITFC offers the following written comments on Arctic-Yukon-Kuskokwim regulatory change proposals in an effort to improve the working relationship between the State of Alaska and the tribal citizens and rural residents of the Kuskokwim River drainage:

**Proposal 90** to manage Kuskokwim River Chinook salmon under Tier II subsistence fishing regulations: The KRITFC Executive Council **takes no action** on this proposal because of the widespread opposition to Tier II management in the lower portion of the river and varying positions elsewhere.

**Proposal 91** to expand ADF&G's management tools during times of non-king salmon conservation concern: The KRITFC Executive Council **supports** this proposal. Currently, state fisheries regulations only allow using alternative gear types and limiting mesh size to provide subsistence harvest during Chinook and chum salmon conservation. This proposal would extend these to sockeye salmon and coho salmon. Management flexibility during multi-species salmon conservation is critical to providing reasonable opportunities for subsistence fishing throughout the Kuskokwim River drainage with reasonable expectations of successful harvesting. For example, had these regulations been available for the 2022 season, ADF&G might have been able to allow subsistence fishing with alternative gear types during coho salmon conservation instead of effectively closing all subsistence fishing activities from August 17 to September 15, 2022 for all species of fish.

**Proposal 92** to provide ADF&G more flexibility in setting subsistence salmon fishing closures before, during, and after commercial fishing periods in Districts 4 and 5: The KRITFC Executive Council considered this proposal and voted to remain **neutral** on this proposal.

**Proposal 93** to close the Buckstock River, a tributary of the Aniak River, to all fishing between June 14 and September 1 to protect shallow waters for fish habitat and especially salmon spawning activities: The KRITFC Executive Council **takes no action** on this proposal.

**Proposal 94** to close sportfishing for chum salmon by non-Alaska residents on the Kanektok River from June 1 to July 15 to protect declining chum salmon populations and help meet chum salmon escapement goals: The KRITFC Executive Council **supports** this proposal by a Member Tribe, the Native Village of Kwinhagak, striving to conserve chum salmon and ensure subsistence fishing priorities.

**Proposals 95 and 96** to ensure that the public users of federal waters are not confused by the actions of ADF&G during federal subsistence fisheries management of federal waters pursuant to ANILCA Title VIII: The KRITFC Executive Council **supports** these regulatory changes to the Kuskokwim River Salmon Management Plan as submitted by KRITFC.

**Proposal 97** to expand commercial fishing gear types in the Kuskokwim Fisheries Management Area by allowing dipnets and beach seines to lawful gear types: The KRITFC Executive Council **opposes** this proposal following extensive discussion. In short, KRITFC determined that commercial fishing should not be allowed during these unprecedented times that we are trying to sustain our salmon. Just because there may be one abundant species (sockeye) does not mean that we should sacrifice possible risks to other salmon species experiencing conservation concerns.

Sincerely,



Dr. Michael Williams Sr.  
Chair, KRITFC