

We write to express our deep concern regarding Board Member Irwin's actions in drafting and introducing RC245 to amend Proposal 127. As Unangan people and the unified Tribes of the Eastern Aleutians, we have dedicated substantial time throughout this process to provide personal testimony and traditional knowledge regarding the cultural, subsistence, and economic importance of the June fishery. We have also clearly articulated the cumulative impacts that increasingly restrictive management measures are having on our communities.

To our knowledge, Board Member Irwin made no effort to consult with, notify, or meaningfully engage our tribal leadership or community members prior to introducing this amendment. RC245 proposes management changes that directly affect our traditional and historic fisheries, yet it was advanced without input from the Tribes and residents most directly impacted. Decisions of this magnitude, particularly those affecting subsistence practices, cultural continuity, and regional livelihoods, must be developed through transparent and meaningful dialogue. They should not be introduced without the knowledge or participation of the sovereign tribal governments whose communities depend on these fisheries.

We cannot support RC245 or the policy direction it advances. Introduced late in the process, after the close of Committee of the Whole and on the eve of final deliberations, the amendment was crafted without collaboration from the fishermen, families, residents, and Tribes of the Eastern Aleutians. The proposed time reductions, layered on top of area reductions already adopted under Proposal 126, would severely impair the June salmon fishery's ability to operate in a manner that avoids chum salmon harvest while preserving our longstanding fishing practices in areas of deep cultural and historical significance.

Furthermore, placing the entirety of the June fishery under the emergency order authority of the Commissioner of the Alaska Department of Fish and Game is neither prudent nor workable. Such a structure removes predictability for fishing families and communities, concentrates authority in a manner inconsistent with prior management frameworks, and creates instability in a fishery that requires planning, coordination, and certainty to operate responsibly.

Our Tribes have engaged in good faith throughout this process. We expect that management decisions affecting our region will reflect that engagement and respect our sovereign role, our cultural ties to the fishery, and the economic realities of our communities.

https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/akpen/rcs/rc270_AMSA_Opposition_RC245.pdf

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