
ALASKA BOARD OF FISHERIES

Arctic/Yukon/Kuskokwim Finfish Meeting

Fairbanks | November 18-22, 2025

On-Time Public Comments

Alakanuk Native Corporation	PC1
Algaaciq Tribal Government.....	PC2
Ji Montgomery	PC3
Gabriel Buster	PC4
Charlie Campbell.....	PC5
City of Alakanuk	PC6
Jeff Cook	PC7
Seth Kantner	PC8
Native Movement	PC9
Native Village of Nunam Iqua.....	PC10
Raymond Oney.....	PC11
Brian Roppolo	PC12
Seward Peninsula Subsistence Regional Advisory Council	PC13
Village of Alakanuk.....	PC14
David Warner	PC15
Yukon River Inter Tribal Fish Commission	PC16
Yupiiit of Andreafski.....	PC17

Alakanuk Native Corporation

P.O. Box 148

Alakanuk, Alaska 99554

PH: (907) 238-3117/ FAX: (907) 238-3120

Email: auknative_corp148@yahoo.com

November 3, 2025

Dear Alaska Board of Fisheries,

We, the board of Directors of the Alakanuk Native Corporation, are writing to express our deep and unwavering opposition to Proposal #15 and Proposal #16, which are scheduled for consideration at the upcoming 2025 Arctic, Yukon, Kuskokwim (AYK) meeting.

For generations, the people of Alakanuk have lived in close relationship with the land and waters that sustain us. From these waters come the salmon that feed our bodies, our spirits, and our way of life. Our people rely on these fish not only for food, but for identity, for community, and for the survival of our culture. To take that away is to take away a part of who we are.

Our community depends heavily on Yukon River salmon. They are rich in the nutrients that keep our families healthy, especially our elders and children. But salmon are much more than food- they are part of our ceremonies, our teachings, and our responsibilities to one another. Each harvest season connects us to our ancestors and to the generations yet to come.

Alakanuk, like many other Western Alaska communities, has no road access. The cost of store bought food is far beyond what many families can afford, and what little is available often lacks the nourishment we need. Salmon has always filled that gap- it is the food that sustains us through the long, dark winters when nothing else will.

For years, our people have endured strict harvest restrictions on both Chinook and Summer Chum Salmon. We have done everything asked of us- conserving, adapting, and sacrificing- because we care deeply about protecting the fish and the future. But the burden has not been shared equally. We cannot accept proposals that would place even harsher limits on our community while others upstream continue to harvest freely.

Fairness and respect must guide every decision about these fish. Any further restrictions must be equally shared by all along the river. To do otherwise would be unjust and would deepen the hardship already felt by families who are struggling to survive.

Submitted by: Benjamin B. Phillip
Alakanuk Native Corporation

Community of Residence: Alakanuk

Proposal # 15- We already are overburdened by numerous restrictions, no need to add anymore.

Proposal # 16, same reasoning as above.

Alaska BOF Comments
November 18-22, 2025 meeting
Pikes Waterfront, Fairbanks

Comments from the Algaaciq Tribal Government, St. Mary's, AK
Sven Paukan, Tribal Administrator

These comments are in reference to the Yukon River Subsistence Fisheries proposals numbers 15, 16 & 17.

Proposal #15 – The Algaaciq Tribe is **opposed** to this proposal, to place a 2-year closure of Yukon River Fall Chum Salmon as proposed.

The proponent requests that the Department close harvest of fall chum “*when these stocks are detected at Lower Yukon Test Fishing site (LYTF) in District 1. Walk the closure up river through fishing District 1-5 as fish enter each district.*”

Proposal #16 – The Algaaciq Tribe is **opposed** to this proposal, to “*close the mainstem Yukon River to the 4” or less mesh gillnets for Fall Chum salmon conservation..*” for 4 years.

Currently, management already has the power to close the Yukon river to fall chum, as well as Chinook and summer chum, subsistence fishing, and the use of 4” nets, in times of expected low stock returns. They have enacted such closures over the past several years, closing each district to subsistence fishing of all salmon species with any type of gear, including 4” mesh, as the salmon migrate up the Yukon River over the summer and fall season. The Department has also enacted “windows” closures of 4” mesh gear (no longer than 60’ in length), during both the summer and fall season as the salmon migrate up the Yukon River.

The two proposals, as stated, are already part of the department’s management “tool box,” meaning they already have the power to close subsistence fishing and enact “window” closures as well. The only difference these two proposals would enact is additional restrictions to fishing opportunity. Should the stocks improved and the department determined a surplus for subsistence fishing, an extended timeline under these proposals would create undue hardship on users and a foregone loss of subsistence opportunity for users.

Proposal 17 – The Algaaciq Tribe has **no opposition** to this proposal. This proposal “allow the use of 6” or less mesh gillnets during times of salmon conservation,” specifically in Hamilton Slough, the Anen’aq River and the Ingricuar River during the month of September.

Algaaciq recognizes the proponent’s request to use 6” mesh gear targeting non-salmon species in sloughs and rivers not associated with salmon spawning areas. We also acknowledge the customary and traditional use of these larger mesh gear, larger than 4” mesh, for white fish and sheefish during the fall for these non-salmon species, when they are customarily fished.

We would recommend that the proposal be amended to remove the “September 1-30” language and not limit this type of gear to a certain time on these non-salmon spawning rivers and sloughs.

Submitted by: Ji Montgomery
None

Community of Residence: Beacon

Oppose drilling into arctic alaska refugees

Submitted by: Gabriel Buster

Community of Residence: Alakanuk

In reconsidering Proposal #15 and Proposal #16, I want to emphasize how deeply the Western and coastal regions rely on subsistence gathering — especially for king and coho salmon. These resources are not just food; they are central to our way of life, our health, and our community’s wellbeing. There are already many known factors, especially manmade ones, that have affected salmon populations — we see it in the news and in our own rivers. Despite these challenges, subsistence fishing remains essential to who we are as Tribal members. It sustains our families, our children, and our elders. Any decision regarding these proposals must recognize that subsistence is not just an activity — it’s our food security, our cultural identity, and our responsibility to future generations.

To: **Alaska Board of Fisheries**

From: **Charlie Campbell**

[REDACTED] **Tanana, Alaska** [REDACTED]
[REDACTED]
[REDACTED]

November 3, 2025

Dear Sirs/Mesdames

I wish to comment on proposals 15, 16, and 17 in the Yukon River finfish proposals for this Board cycle, and appreciate the chance to submit this testimony.

I am a fisherman in the Rapids area 35 miles above Tanana, and have been both a commercial and subsistence fisherman there for over 40 years. I have also worked on several fisheries projects for the US Fish and Wildlife Service, most lately as the operator of the fishwheel for the three year Icthyophonous project that finished in August of 2024. I also served as a delegate on the Yukon Canada Salmon Treaty negotiations in the 1990's, and have attended numerous Board of Fishery meetings on topics related to subsistence fishing as relates to Tanana.

Our Tanana-Rampart-Manley AC also was the first to propose a river-wide moratorium on fishing King Salmon, and so I believe my bonafides as a conservationist are pretty well established. I also authored a paper about the sequence of events that led to the decline and then crisis on the Yukon River Chinook run, and went on record encouraging fisheries managers to stand firm on conservation, which they have.

In regards to proposals 15 and 16: I do appreciate the Eagle AC concerns, and do not quibble with the importance of keeping the Chum salmon run healthy, and the importance of the run to the spawning ecosystem as a whole.

I feel at this point, however, that ADF&G and USFWS have been making wise choices in how they are managing this period of shortage.

The managers are currently:

- a) Shutting the run to all gillnet fishing including less than 4 inch mesh net for over three full weeks, moving up the river sequentially as best they can ascertain with the bulk of the run.
- b) Being even-handed in applying these conservation measures to all districts
- c) Well aware of the problem, and responding appropriately.

The fishermen are currently:

- a) Cooperating with the regulations
- b) Supporting the spirit of the regulations by using short nets (40 to 60 feet) of 4 inch and less mesh and fishing them close to shore
- c) I would not concur that a 60 foot, 4 inch or smaller mesh net is a “very effective gear type to catch Chum Salmon.” Being fished close inshore, we find in our district that there are few females caught, and that the males, which also are few, are caught primarily by their teeth, primarily, we surmise, going to local streams near us, as they are dark and very advanced.
- d) Implementation of the closures has not been “incredibly complicated and thus ineffective”. It is a simple matter to adhere to a closure that is going to last until opened again. While perhaps the outreach to the villages could stand to be a bit more thorough, basically the message gets out and Fishers in our district comply.

e) The whitefish that we do catch in the 4 inch mesh are an important way to sustain the subsistence use of fish, both in our district and in the lower river. Whitefish are a good source of nutrition, and are not wasted.

Because of the failure of these runs (Chinook and Chum) there are many fewer fishermen in our district at fish camp, (although plenty of shuttered camps), and Tanana, by way of example went from having around 400 sled dogs ten years ago to a grand total of about 20 now. The pressure on the chums has been lifted in a big way. There are no fishwheels operating in our district any longer.

Ideally, conservation of Chums in the North Pacific and Bering Sea would be seen as equally important, Eg; the overproduction of hatchery Chum from

hatcheries in Southeast that may be outcompeting wild Chum stock in the ocean continues apace, and the same with various interceptions of Chums that are bound for the Yukon. This would also make the in-river conservation efforts easier to bear.

If in the course of the next few years the numbers stay very low, I would then support a proposal for a complete moratorium (along with substantially more stringent conservation measures in the ocean), but at the moment I believe the managers are pursuing a reasonable middle course that allows fishers to harvest at least a few whitefish that are important to their health and economic and spiritual wellbeing.

Regarding Proposal 17,

It sounds reasonable on the face of it, if in fact there are NO chum going up or resting in the bodies of water mentioned. However, it does constitute a benefit to that district that is not shared in the upriver districts, and my concern is that the “Devil is in the details”, both in terms of implementation, regulation, and monitoring. I support it for a year’s test fishery, although with unease, in the sense of: “What can go wrong? Who will monitor that no Chums are being caught? Who will enforce it? How easy will it be to undo if it ends up targeting Chums?” I feel those questions should be answered definitively before the Board makes a decision.

Thank you very much for the opportunity to comment.

Sincerely,

Charlie Campbell
Tanana, Alaska

We the people of Alakanuk, we the City of Alakanuk, Municipality, second class city, municipal government, we are unanimous and speak with one voice collectively.

We are most assuredly adamantly against Proposals 15 and Proposal 16, respectively. We live in our Kusilvak Region, the very poorest region in all of Alaska, and in the contiguous United States.

If passed, these two Proposals will hamper us, hurt us, compound our economy, finances, way of life, our tradition, our heritage, our culture! They will affect us egregiously and detrimentally!

We are against the closure of our Yukon Mainstem Fall Chum Salmon and against a two year closure on the harvest of our Yukon River Fall chum salmon.

We are against the closure of our use of 4" mesh gillnets on our Yukon River Mainstem, we are adamantly most assuredly against the close harvest of Yukon River Mainstem fall Chum Salmon when our Fall Chum Salmon stocks are detected at our Lower Yukon Test fishing sites in our district one.

We are unanimously against our use of 4" mesh gillnets being closed on our Lower Yukon Mainstem when all of our Fall Chum Salmon are detected at the Lower Yukon Test fishery, in our district one, with subsequent closures, through fishing districts one to five, as our fall chum enter each of our respective districts.

We are totally against the closure of our fishing district for two years!

Sincerely,

Michael James

Michael John James

City of Alakanuk

Vice-Mayor

Subsistence fisherman

Commercial fisherman

Submitted by: Jeff Cook
Harding Lake Association

Community of Residence: Fairbanks

I am president of the Harding Lake Association (HLA) an organization representing approximately 90 % of the property owners on Harding Lake. Our Board of Directors has unanimously approved endorsing proposals 21 and 22 to open up catch and release fishing for northern pike on Harding Lake. The HLA has worked diligently the past 20 years to raise the level of Harding Lake to improve the lake level at the north end of Harding Lake which is critical habitat for the northern pike. The HLA sponsored and has maintained the Zach Warwick Diversion to help increase water flows into Harding Lake from Rogge Creek. This has been very successful. It is now time to reopen the lake initially to the catch and release as your staff has proposed. Thank you, and please contact me by e-mail or phone with further questions or clarification on my comments.

Jeff Cook, President
Harding Lake Association

[REDACTED]
Fairbanks, AK [REDACTED]
[REDACTED]

Submitted by: Seth Kantner

Community of Residence: Kotzebue

PROPOSAL 40

5 AAC 01.130. Subsistence fishing permits--for sheefish hooked thru the ice.

I and Aakatchaq submitted this proposal, and support it. We realize this is a change for us in this region, but to help protect this resource we need good accurate harvest data (as apposed to what we presently have--none.)

We urge the board to NOT require permits for subsistence net fishing, and net fishing in open water season along rivers and coasts. That would be too much of a burden. Net fishing is traditional for subsistence harvests in those seasons, the food is important, and we encourage ADFG to work to gather harvest data for that harvest also, but in other ways that don't require carrying paper permits. If possible, it would also help if this new required fishing permit available online/ on cell phone. Thank you.

PROPOSAL 39

5 AAC 70.011.

Aakatchaq Schaeffer and I submitted this proposal and we support it passing. We live subsistence and most years hook 2 to 8 sheefish through the ice for food--total. Sheefish are tasty, big, old, and valuable and we definitely want to catch a few, but don't need a lot for our catch to be enough. Also, in the freezer they go downhill in quality fairly rapidly.

Sport fishing pressure is increasing here in the region. We are seeing more people that fly in for a week, or just for the day, in March, April, and May. These folks love the adventure. And it is an amazing one. And it can remain exactly that without these fishers catching 10 huge beautiful 20-30-or 40year-old fish, each day. Catching 5 is amazing. Hooking 5 NW Arctic sheefish is still a once in a lifetime catch. (Only one time in the last 60 years here in the region have I hooked as many as 7.) Reducing this limit from 10 to 5 wouldn't hurt anyone, or anyone's fishing trip, and would protect the resource--at least until ADFG has solid data on harvest levels, sheefish population, and sustainability of this valuable local species. Thank you for your thoughtful consideration on this.



NATIVE MOVEMENT
 Building Healthy & Sustainable Communities
www.nativemovement.org

Submitted by: Native Movement
To: The Alaska Board of Fisheries

RE: Public Comment on Arctic / Yukon / Kuskokwim (AYK) Finfish Proposals (2025–2026 Cycle)

Dear Members of the Board,

On behalf of Native Movement, we respectfully submit the attached public comment on Proposals 12 through 43 in the Arctic-Yukon-Kuskokwim (AYK) Finfish cycle. Our positions reflect the voices of Indigenous communities and organizations working to protect fisheries populations that are foundational to our cultures, food systems, and ways of life.

We also want to acknowledge the significant hardships our region has been facing. Rivers are flooding, banks are eroding, and safe access to subsistence resources is increasingly compromised. Many communities in the AYK region are not connected to the road system, and with the rising cost and lack of flights, travel has been prioritized for medical necessity. Fall is a critical time for preparing for winter, and when compounded by unforeseen challenges, it becomes a time of survival and community care. Communities are coming together to support one another, but these conditions have made it difficult for many Advisory Committees to meet and vote on proposals during this cycle. Please do not mistake the lack of formal engagement for a lack of care or priority. Our communities remain deeply committed to stewardship and food security.

We urge the Board to uphold the subsistence priority as mandated by AS 16.05.258 and to apply the precautionary principle particularly in data-poor fisheries. Where escapement, harvest, or mixing data is lacking, the Board must default to conservation and honor Traditional Ecological Knowledge (TEK) as a valid and necessary form of evidence. In the absence of clear evidence that a fishery can sustain additional pressure, the burden of proof must fall on those proposing liberalization, not on communities who rely on these stocks for food, culture, and identity. This is especially critical in small or remote systems where TEK has long warned of declining abundance, shifting distributions, and increased vulnerability during spawning or overwintering periods. In these cases, TEK is not a substitute for science, it is science, and it must be treated as such.

We appreciate the Board's attention to these comments and stand ready to collaborate on implementation, monitoring, and co-management solutions that reflect the knowledge, rights, and responsibilities of Alaska Native peoples.

Kuskokwim & Kuskokwim–Goodnews Proposals (12–14)

Proposal 12 – Support

Topic: Legalize eel sticks for Arctic lamprey harvest

Rationale: This proposal aligns regulations with customary and traditional practices for harvesting Arctic lamprey using eel sticks, a method used for generations. Recognizing this gear type supports cultural continuity, improves safety in low-light conditions, and poses no conservation concern.

Amendment Requested: Add a cross-reference to the eel stick definition in 5 AAC 39.105(d)(31) for clarity.

Proposal 13 – Support

Topic: Close upper-river king salmon sport season (May 1–July 25)

Rationale: This proposal reduces sport fishing overlap with spawning Chinook and minimizes gear conflicts during subsistence closures. While emergency orders have been used in-season, codifying this closure in regulation provides clarity and consistency.

Proposal 14 – Support

Topic: Remove sheefish bag limits in rivers where sheefish are absent

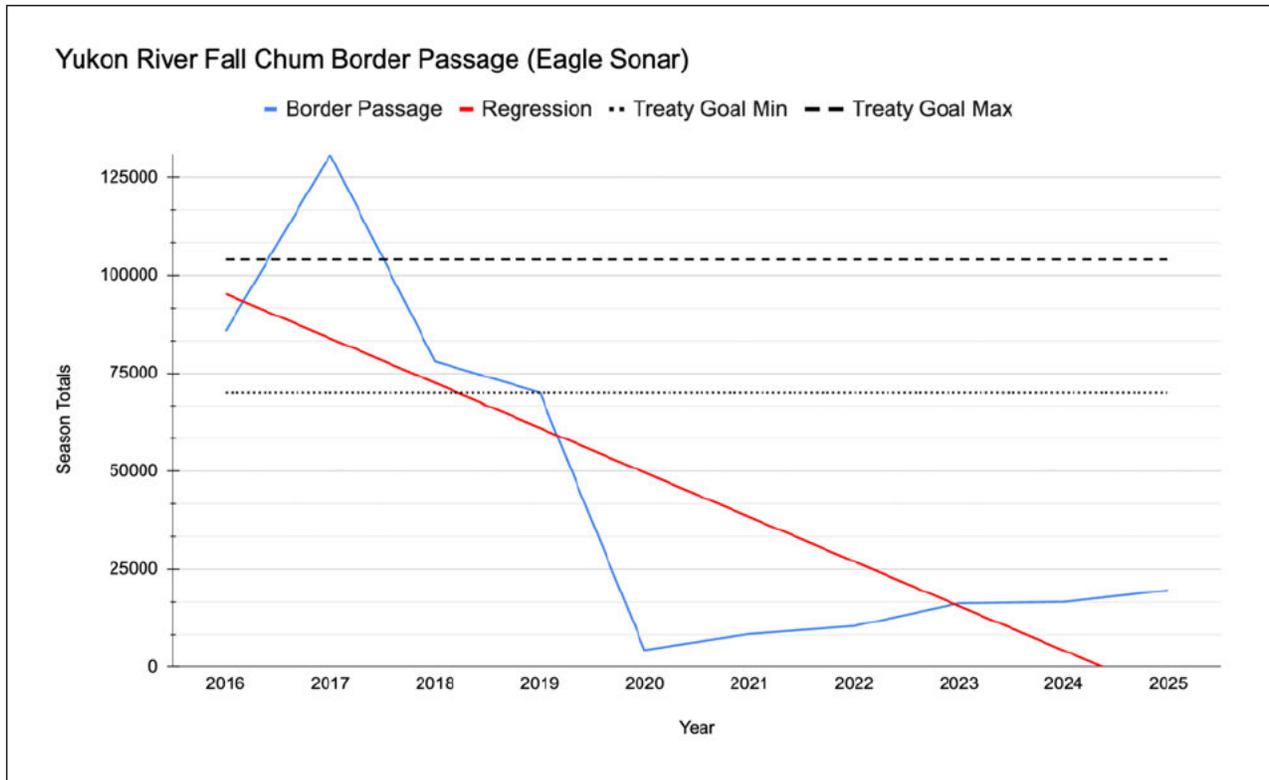
Rationale: This is a regulatory clean-up that removes unnecessary restrictions in areas where sheefish do not occur. It improves clarity without affecting conservation or subsistence. We recommend adding a note in the synopsis “no sheefish present - regulatory housekeeping.”

Yukon River Proposals (15–17)

Proposal 15 – Support with Sunset & Review

Topic: Two-year closure of main stem fall chum harvest

Rationale: We support Prop 15 as a necessary emergency measure to protect Yukon fall chum, which remain far below historical averages and have repeatedly failed to meet Canadian treaty objectives. This proposal was initiated by Tribal and Advisory Committee partners and aligns with the legal requirement to eliminate other uses before restricting subsistence when no reasonable opportunity exists (AS 16.05.258(b)(4)). Fall chum are vital for food security, cultural continuity, and ecosystem health.



Regression annotation: $y = -11,379x + 23,000,000$, $R^2 = 0.62$

- Explains 62% of the variation, confirming a strong downward trend.
- Each year, border passage declines by ~11,379 fish.
- The collapse after 2019 is sharper than the linear model predicts, underscoring the severity of recent years.
- Trend suggests continued failure without intervention.

If the current linear trend continued unchecked, the model predicts zero passage by ~2024.

This is alarming because we are already past that year, and actual counts are critically low (19,600 in 2025), **confirming the collapse trajectory**. Refer to **Amendment Recommendation** below; ASL data is critical for understanding stock resilience and rebuilding potential. In 2025, ASL sampling indicated 78% age-4 and 17% age-5 fish, with smaller average length (574 mm vs historical 583 mm), signaling stress on older cohorts and possible reduced fecundity (2025 Yukon Area Fall Salmon Fishery Update #14).

Amendment Recommendation: Include a two-year sunset clause and require an annual review based on Eagle sonar and Fishing Branch escapement data. Add:

- (i) Explicit sunset after 2 years with annual review against U.S./Canada treaty goals and Eagle sonar performance.
- (ii) State commitment to food security mitigations and non-salmon access windows & gear during closures.
- (iii) Require annual post-season reporting by ADF&G on:
 - U.S. drainage-wide performance (Pilot Station)
 - Canadian treaty objectives (Eagle sonar, Fishing Branch)
 - Age, Sex, and Length (ASL) composition data for fall chum salmon to assess

demographic shifts and reproductive potential.

(iv) Transparency clause: Reports must be presented publicly and include TEK-informed observations alongside agency data.

Proposal 16 – Support with Selective Gear Access

Topic: Close 4" gill nets during fall chum passage

Rationale: This proposal addresses fall chum catch during non-salmon targeting in the main stem. We support it and note that this regulation should apply only to the main stem Yukon River, not as a blanket restriction on tributaries. In tributaries such as the upper Koyukuk, 4" nets are traditionally used to harvest whitefish and sheefish in deep water near bluffs, while fall chum remain in the shallow main channel. Extending this restriction to tributaries would disrupt traditional harvests and increase hardship without meaningful conservation benefit. Reopening by district once the tail end of the run passes and escapement goals are met ensures both conservation and food security. Furthermore: Localized assessment sites provide district-specific indicators of fall chum passage, allowing managers to reopen selective gear access without jeopardizing conservation goals. Relying solely on drainage-wide averages can delay openings unnecessarily or risk premature liberalization. By using existing sonar stations, test fisheries, and community-based monitoring, combined with TEK, the Board can implement adaptive, real-time management that honors both food security and conservation. TEK integration ensures that observations from river users, who have tracked run timing for generations, are treated as valid evidence alongside scientific data.

Amendment Recommendation: During main stem 4" gill net closures, subsistence harvest of non-salmon species may continue using selective gear types, hook-and-line, manned fish wheels, dip nets, and beach seines, with mandatory release of fall chum salmon. District-by-district reopening shall occur only after the tail end of the fall chum run is confirmed at localized assessment sites.

Localized assessment sites include existing monitoring infrastructure and community-based observation programs identified by ADF&G in consultation with Tribal partners. These sites shall provide real-time or near-real-time indicators of fall chum passage for each district:

- Lower Yukon (Districts 1–3): Pilot Station sonar and associated test fisheries.
- Middle Yukon (Districts 4–5): Rapids test fishery and Galena community monitoring.
- Upper Yukon (Districts 6 & 7): Eagle sonar for Canadian-bound fish, supplemented by TEK observations in tributaries.

The department shall publish reopening criteria and communicate updates through established channels (radio, advisory committees, Tribal notifications). TEK shall be recognized as a valid and necessary form of evidence in determining safe harvest windows.

Proposal 17 – Oppose

Topic: Allow ≤6" set nets in three sloughs in September

Rationale: These areas are adjacent to the main stem, and fall chum salmon are still migrating through them in early to mid-September. 6" mesh gill nets are highly effective at catching salmon, increasing the risk of incidental harvest during a critical conservation period. This proposal conflicts with the goals of Proposals 15 and 16, which aim to reduce salmon interception and rebuild stocks. While supporting

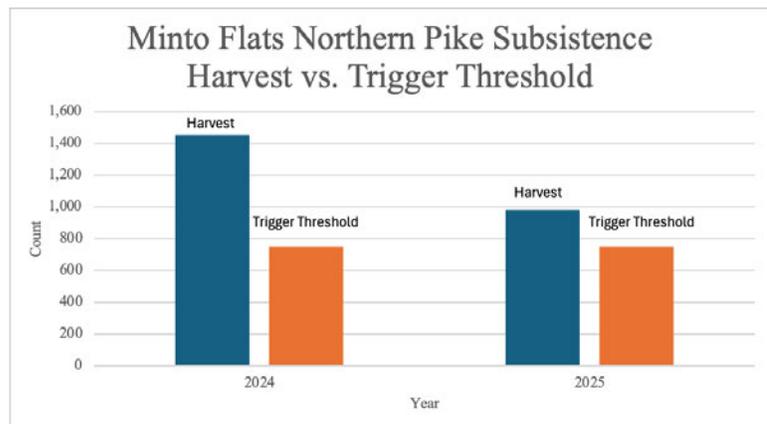
subsistence harvest of non-salmon species is important, it must be balanced with the urgent need to protect fall chum. Adopt Proposals 15 and 16 as a unified strategy for fall chum conservation, with Proposal 16 applying only to the main stem. Reject or amend Proposal 17 to prevent increased salmon interception during migration. We urge collaborative review and TEK to assess safe harvest windows with a selective-gear alternative (hook/line, dip nets, manned wheels) for non-salmon species to preserve food security for whitefish/salmon-bycatch-release during the closure windows.

Tanana Drainage Proposals (18–27)

Proposals 18–20 – Oppose

Topic: Minto Flats Northern Pike Management

Rationale: These proposals would weaken or eliminate the sport bag-limit reduction trigger that currently activates when subsistence ice harvest exceeds 750 fish. This trigger is a key conservation buffer that has been used effectively in 2024 (1,454 fish) and 2025 (983 fish) to reduce sport harvest when subsistence needs are high, demonstrating its conservation value. Removing or narrowing this provision would erode a critical buffer



(Reinforces why removing or weakening the trigger could erode a critical conservation safeguard)

protecting overwintering pike populations, which are hyper-vulnerable in concentrated zones. The sport bag reduction is a modest but meaningful safeguard that complements subsistence management. Proposal 20 offers a compromise by limiting the bag reduction to the southeast quarter of Minto Flats, where tagging data shows most overwintering pike are harvested. We support this only if ADF&G confirms limited mixing between overwintering zones. If mixing is significant, the area-wide reduction should remain.

Recommendation: Retain 5 AAC 74.044(b)(2)(C) trigger; if modified per Proposal 20, apply the bag-reduction only to the southeast quadrant documented by tagging, with department confirmation in the record.

Proposals 21–22 – Oppose

Topic: Harding Lake Pike Catch-and-Release

Rationale: We oppose these proposals based on Indigenous knowledge systems, cultural values, and scientific evidence regarding catch-and-release fishing. Within many Alaska Native and Yukon First Nations communities, catch-and-release is viewed as disrespectful to the fish and contrary to traditional stewardship ethics. Fish are not sport, they are relatives and providers. Catching a fish only to release it after stress and injury violates these values and does not align with Indigenous principles of reciprocity and respect. Furthermore, research has shown that catch-and-release fishing can result in significant

mortality, especially for species like northern pike that are sensitive to handling, temperature, and hook injuries. Even with barbless hooks and handling protocols, delayed mortality and sub-lethal impacts can occur, undermining the intent of “low-impact” access. This proposal does not support food security or cultural continuity. Reopening Harding Lake to catch-and-release fishing risks further stress on a population that has not rebounded, and it does so without providing meaningful harvest opportunities for local communities. For these reasons, we oppose Proposals 21-22 and urge the Board to prioritize Indigenous values and food sovereignty in its decision-making. Some may argue that the Harding Lake pike population has not rebounded despite a long-term closure. This observation must be contextualized. Northern pike exhibit density-dependent population regulation, including cannibalism, territoriality, and habitat-limited growth. In systems like Harding Lake, where spawning and nursery habitat is constrained, population size may stabilize below historical levels regardless of harvest pressure. This does not imply that reopening the fishery will improve abundance. Instead, it reinforces the need for cautious, adaptive management.

Amendment Requested if Approved: Include temperature-based closures (e.g., prohibit C&R when water temperature exceeds 18°C). Require angler reporting cards to monitor effort, handling practices, and fish condition post-release.

Proposal 23 – Support

Topic: Remove Special Bag Limit at Volkmar Lake

Rationale: This is a remote, low-effort fishery. Defaulting to general bag limits is reasonable.

Recommendation: Require a 3-year manager report if effort increases.

Proposal 24 – Neutral w/ Recommendation

Topic: Chena River Youth Fishing Days

Rationale: Repealing designated youth fishing days raises social access concerns. If repealed, we recommend adding “family-assist” language to allow adults to help disabled youth, preserving the original intent of access and inclusion.

Proposal 25 – Neutral

Topic: Repeal Ice House Registration

Rationale: Repealing the registration requirement reduces regulatory burden without affecting subsistence.

Recommendation: We recommend maintaining a requirement for labeling shelters left >24 hours for safety and accountability.

Proposal 26 – Oppose

Topic: Repeal Shaw Creek Spring Grayling Protections

Rationale: Shaw Creek is a known spawning and juvenile rearing area. Removing April-May catch-and-release protections could increase stress on spawning fish.

Amendment if Approved: Retain a spawning-season C&R window or pilot-test one reach with post-season review.

Proposal 27 – Support

Topic: Align Rainbow Lake with Stocked-Waters Bag Limits

Rationale: Aligning Rainbow Lake with the regional stocked-waters plan (10 fish combined, only one ≥ 18) simplifies regulations and increases opportunity without impacting subsistence or wild stocks.

Norton Sound Proposals (28–38)

Proposal 28 – Support

Topic: Define beach seine specs under non-retention EOs

Rationale: Clear gear specifications, maximum length, depth, mesh size, and prohibition on mono filament, under non-retention EOs improve survival of non-target species, especially king and chum salmon. This clarity enables ADF&G to reopen fisheries with confidence and ensures that conservation and subsistence access are both supported.

Proposals 29–31 – Support

Topic: Sinuk River sockeye limit and seining area adjustment

Rationale: The Sinuk River supports a small, vulnerable sockeye stock with limited escapement data (e.g., past Glacial Lake video monitoring). Safety conflicts in the upper river are well-documented. These proposals prudently establish a 25-fish seasonal limit and move the legal seining area downstream to Camp Creek, improving both conservation and user safety.

Amendment Suggested: Allow in-season liberalization if NSEDC/ADF&G enumeration indicates surplus past escapement goals.

Proposal 32 – Support with EO Backstop

Topic: Repeal marine schedule west of Cape Nome

Rationale: Liberalizing to a 7-day schedule aligns with the east side and helps families take advantage of weather windows and drying periods. However, recent below-average returns in the Nome and Snake Rivers, combined with high-water uncertainties, warrant a precautionary approach.

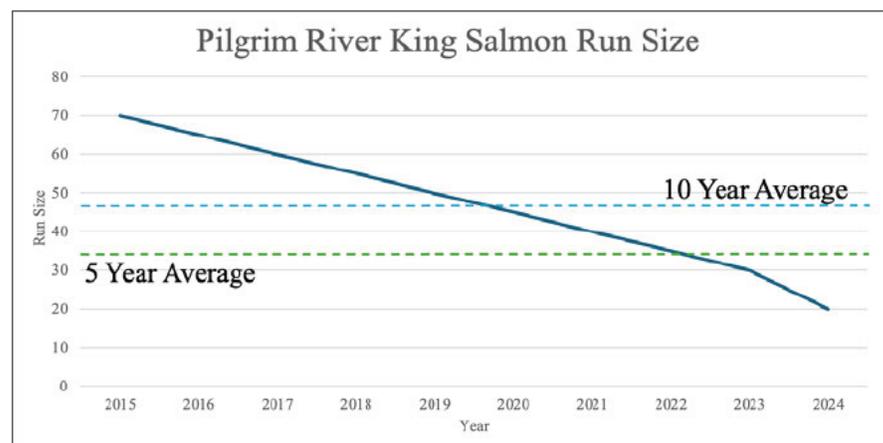
Amendment Requested: Include explicit emergency order authority to reinstate the schedule if escapement stalls.

Proposals 33–34, 37 – Support

Topic: Pilgrim River king salmon conservation

Rationale: The Pilgrim River king salmon run is extremely small (5-year mean ~ 30 ; 10-year mean ~ 55). These proposals form a coherent conservation package:

- **Proposal 33:** Prohibit king



retention during sockeye seining.

- **Proposal 34:** Reduce the annual subsistence king limit to 1 fish.
- **Proposal 37:** Close sport fishing for king salmon entirely.

Together, these measures reflect appropriate low-abundance management and community support. Packaging them together ensures clarity and consistency.

Proposal 35 – Support

Topic: Repeal the requirement that subsistence fishers using rod and reel in flowing waters of Northern Norton Sound adhere to sport fishing bag and possession limits

Rationale: Requiring subsistence rod and reel users to follow sport fishing limits undermines this principle and creates unnecessary barriers to food access. This change would correct a regulatory inconsistency and improve access for subsistence users who rely on rod and reel as a legal gear type. Not all families have access to boats or nets, making rod and reel an important and accessible method. Concerns about enforcement are addressed by the existing permit system. Subsistence fishers must carry a permit and record their catch before leaving the fishing site, providing a clear distinction from sport users. This system works effectively in other regions and should be trusted here. Maintaining sport limits for subsistence rod and reel users adds unnecessary complexity and penalizes lawful subsistence practices. Repealing this requirement would simplify enforcement, align with statewide standards, and uphold the subsistence priority mandated by AS 16.05.258. For example, in Norton Sound, subsistence salmon fishing with rod and reel requires a permit, and the Nome ADF&G office issues these permits for the region.

Proposal 36 – Oppose

Topic: Allow sport catch-and-release when subsistence is closed

Rationale: Allowing guided sport catch-and-release for king salmon when subsistence retention is closed undermines the legal and ethical priority of subsistence. It creates inequity and erodes trust in management.

Proposal 38 – Support with Safeguards

Topic: Modify hook size specifications for sport fishing for salmon in the Northwestern Area.

Rationale: This proposal seeks to legalize commonly used lures, such as the 7/8 oz Blue Fox Pixee, that currently exceed allowable hook size under existing regulations. Many local fishers have been cited while riverbank fishing with slightly oversized hooks, despite not engaging in snagging or fishing from man-made structures. These citations penalize honest fishing practices and create unnecessary enforcement conflicts, particularly for subsistence-minded sport fishers who rely on salmon for food security. This proposal reflects a community-driven effort to make regulations more equitable and culturally responsive, while maintaining conservation and stewardship values. We support this proposal as a practical adjustment that aligns regulations with common practice and reduces barriers for local fishers. However, we recognize the need to balance access with conservation. Hook size liberalization must not compromise salmon protection, especially in low-abundance systems or spawning periods.

Amendment Recommendation: Limit the hook size increase to specific lure types commonly used by

local fishers.

Proposals 39 – Support

Topic: Reduce the general sport bag and possession limit for sheefish from 10 to 5 fish (no size limit)

Rationale: Sheefish are a long-lived, culturally and nutritionally vital species for communities in the Kobuk River, Selawik River, Hotham Inlet, and Selawik Lake. Historically viewed as abundant, recent observations and TEK indicate rising harvest pressure and shifting distributions. This proposal responds to increased local reliance on sheefish for food security due to multi-species declines (caribou and chum salmon), the growing influx of non-local sport and ice fishers, many whom ship out large quantities of fish, and a lack of current stock assessments (none since 2018) and subsistence harvest surveys (none since 2015). Thus, reducing the sport bag limit to 5 fish is a precautionary and culturally responsive measure that aligns with TEK and community concerns. It helps protect spawning populations and ensures long-term sustainability without restricting subsistence access.

Recommendation: Pair this reduction with improved monitoring and community-based data collection to inform future management decisions.

Kotzebue Region Proposals (39–43)

Proposal 40 – Support

Topic: Require a free subsistence permit for ice fishing sheefish in the Kotzebue District

Rationale: Sheefish are a vital year-round subsistence species in the Kotzebue Sound region. With declining caribou and chum salmon availability, pressure on sheefish has increased, especially from non-local users and commercial-style harvests. Yet, there is no current stock assessment (last in 2018) and no harvest survey since 2015. This proposal would improve harvest documentation, support data-driven management, and protect a culturally and nutritionally important species.

Recommendation: Ensure the permit is free, accessible online or on paper, and includes community outreach to support compliance and education.

Proposal 41 – Oppose & Needs Clarification

Topic: Legalize Bow and Arrow for Harvest of Non-Salmon Species

Rationale: This proposal introduces a new gear type, bow and arrow, for subsistence harvest of non-salmon species, specifically northern pike in the lower Noatak drainage. While the intent may be to offer a selective harvest method, the proposal raises several questions that require clarification before support or opposition can be determined. Questions remain about injury rates, retrieval success, and whether this method aligns with subsistence ethics. The proposal does not specify bow draw weight, arrow type, or safety standards. These are critical for enforcement, safety, and conservation. Clarify seasonal windows and geographic scope (e.g., lower Noatak sloughs) and clearly limit use to non-salmon species only. Furthermore, we recommend consultation with local Tribal governments and Advisory Committees before advancing this proposal.

Proposal 42 – Support

Topic: Codify Airport Safety Closure for Subsistence and Commercial Fishing

Rationale: This proposal formalizes an existing emergency order practice that mitigates bird strike risks to aircraft. Codifying the closure improves transparency and ensures consistent enforcement.

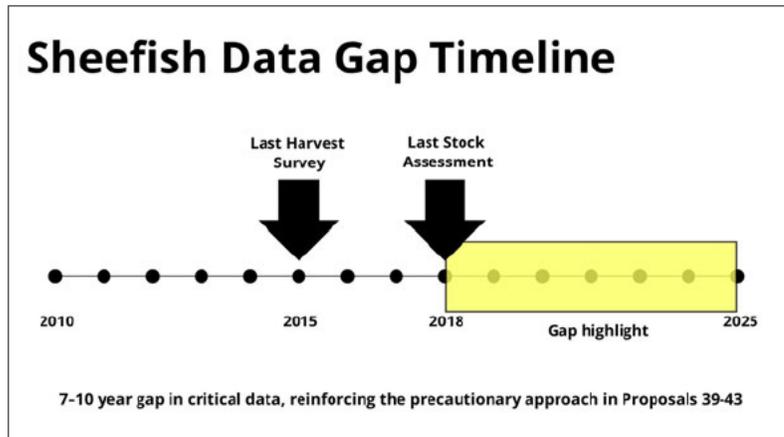
Recommendation: Maintain flexibility for emergency order adjustments if conditions change.

Proposal 43 – Support

Topic: Repeal Commercial Sheefish Season in Kotzebue District

Rationale: There is no current stock assessment or comprehensive harvest data for sheefish in the Kotzebue District. Meanwhile, commercial-style harvests, both local and non-local, are increasing, especially through ice fishing. This proposal is a precautionary measure to prevent over harvest and protect a subsistence priority species.

Recommendation: Pair repeal with improved monitoring and stock assessments.



Prepared by: Michelle Quillin

Approved by: Amanda Bremner



NATIVE VILLAGE OF NUNAM IQUA

Nunam Iqua Traditional Council

P.O. Box 27

Nunam Iqua, AK 99666

Phone: (907) 498-4184 Fax: (907) 498-4185

Email: nunamtribe@gmail.com

October 29, 2025

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Public Comment of Proposal # 15 and Proposal # 16.

To the Honorable Chairman/Chairwoman and Members of the Board of Fisheries:

On behalf of the Nunam Iqua Yup'ik Tribe, this letter serves as formal opposition to Proposal # 15 and Proposal # 16, scheduled for consideration at the upcoming 2025 Arctic, Yukon, Kuskokwim (AYK) meeting. As a sovereign tribal nation with a resident population of 213, our position is rooted in the health, well-being, and inherent rights of our tribal members.

For the Nunam Iqua Yup'ik people, salmon is a fundamental necessity for our daily lives and culture. It provides essential nutrition and economic relief in our rural area, where freight costs are exorbitant and access to commercial food sources is severely limited.

Our community, which is not on the road system, has long relied on salmon for sustenance.

Beyond its nutritional value, salmon is vital to our history, culture, and traditions, woven into our ceremonial practices and used for food and clothing for thousands of years.

We have several serious concerns regarding these proposals:

- **Disproportionate Burden:** Proposals # 15 and # 16 place additional and unwarranted burdens on subsistence users, a demographic that is already inundated with regulations. The existing U.S. and Canadian agreement including the 7-year moratorium, already places a heavy strain on our tribal members and residents. These new proposals further intensify that burden, which is profoundly unfair.
- **Ignoring Critical Factors:** The proposals fail to address other significant scientific and biological factors that contribute to the decline of salmon abundance. These include habitat loss, permafrost degradation, sewage discharge, fluctuations in predator populations, the impact of hatcheries, disease, and the broader effects of climate change. Placing the entire responsibility for low salmon abundance on subsistence users is inappropriate and scientifically unsound.

- **Cultural and Social Impact:** Subsistence activities are the catalyst that unites and bonds our people through the shared cultural values of caring, respect, and family unity. These regulations threaten to erode the social fabric of our tribe. There are both federal and state laws in place that protect our ability to engage in subsistence activities.
- **Economic Devastation:** The economic consequences of further subsistence restrictions will be devastating. Subsistence harvesting is a critical offset to the extraordinary high cost of living in rural Alaska. For tribal members who cannot afford to live without it, these proposals could lead to immense hardship.

Given the existing management guidelines already in place by both state and federal agencies to address salmon abundance, we believe these new proposals are not only unnecessary but actively detrimental to the well-being of our people.

The Nunam Iqua Yup'ik Tribe strongly urges the Board of Fisheries to oppose Proposal # 15 and Proposal # 16 and to instead focus on a holistic management approach that addresses the full range of biological and environmental factors impacting salmon, rather than unjustly penalizing subsistence users.

Sincerely,



Alan Peter, Tribal President
Nunam Iqua Yup'ik Tribe



Stanley Pete, Vice-President
Nunam Iqua Yup'ik Tribe

PUBLIC COMMENT

October 31, 2025

Alaska Board of Fish
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Public Comment on Proposal #15 and #16 - 2025

Hello, my name is Raymond Oney, lifelong resident of the Yukon River. I currently reside in the Village of Alakanuk since 1982 with my wife and two grown children, with 10 grandchildren and two more on the way. Alakanuk continues to be my home.

This public comment letter serves as a formal **OPPOSITION** to proposal #15 and proposal #16, scheduled for deliberation at the upcoming Board of Fish Arctic, Yukon and Kuskokwim (AYK) meeting at Fairbanks, Alaska.

I've enjoyed Our Way of Life since time immemorial, rich in heritage, tradition and cultural values, which we still practice today. I've enjoyed this lifestyle my parents/grandparents taught me how to survive off the land, air and waters. Living a semi-nomadic lifestyle was the only way our forefathers knew how to live, which I still enjoy today.

Proposal #15 and #16:

These two proposals would add unwarranted burdens on subsistence users along the Yukon River, to which we are already over-burdened with fishery regulations. The current 7 year moratorium on Chinook imposed to us, only sanctioned in-river users subsistence users, further intensify the burden. Our people has made so many sacrifices over the years in trying to help rebuild the salmon stocks, and not making any progress. Adding more restrictions would fail to address other significant scientific and biological factors that contribute to the decline of salmon abundance. Adopting these two proposals would add responsibility to lower yukon subsistence users, which would be inappropriate and unsound.

Proposal 16 would only cause further hardship on the mainstem Yukon River to the use of 4" or less mesh gillnets for Fall Chum salmon fishing. We have no other means of harvesting the salmon that migrate through our rivers. Ceremonial events, potlatches and sharing resources would only erode our Cultural and Traditional values.

The current management guidelines, does address allowing subsistence harvest throughout the salmon season, through windows opportunity throughout the districts.

Therefore, I strongly urge the Board of Fish to reject these two proposals. Because this would only add additional burden to our people that heavily rely on salmon in these short summer months, to utilize during the long winter months. We rely on the salmon run that passes through our river since time immemorial.

Raymond J. Oney
Village of Alakanuk

Submitted by: Brian Roppolo

Community of Residence: North Pole

My name is Brian Roppolo and I am a frequent participant in the Harding Lake sport fishery. I support Proposal #22 to open northern pike fishing for catch and release opportunities. However, I recommend that the use of bait be prohibited if this regulation change is adopted. Allowing bait would likely lead to a high catch-and-release mortality rate for northern pike, as fish caught on baited tip-ups during the ice fishery—a currently legal method—often swallow the bait deeply.

Given the already low abundance of northern pike in Harding Lake, this could further reduce the population and disproportionately impact larger, trophy-sized fish that are more frequently targeted by anglers using bait. Prohibiting bait use would help minimize catch-and-release mortality in this emerging pike fishery, while having little to no negative effect on other fisheries in the lake, such as those for lake trout and Arctic char, which are primarily conducted with unbaited lures.

PC13

Submitted By

Seward Peninsula Subsistence Regional Advisory Council

Enclosed is the intended document that was submitted as PC13 on September 30, 2025. The comment appears to have been inadvertently excluded from the On Time Comments document. Please accept this as a Record Copy.

Seward Peninsula Subsistence Regional Advisory Council

c/o Office of Subsistence Management

1011 East Tudor Road MS 121

Anchorage, Alaska 99503-6199

Phone: (907) 787-3888, Fax: (907) 786-3898

Toll Free: 1-800-478-1456

PC13

In Reply Refer To:
OSM.B25051

SEPTEMBER 30 2025

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,

On behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council), I am submitting the Council's comments on a Board of Fisheries (BOF) proposal that will be considered at the upcoming 2025 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on federal public lands and waters in the Seward Peninsula Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on April 1, 2025, via teleconference. Among the items discussed were proposals submitted to the AYK BOF meeting. While the Council did not submit a proposal, Proposal 32 – 5 AAC 01.160 Fishing Seasons and Periods, supports the Councils' discussion to improve access to salmon in our region. Residents of Norton Sound-Port Clarence Area have a customary and traditional use of salmon, and while this proposal does not occur in federal public waters, it does have implications for nearby subsistence users to gain additional access to salmon during inclement weather under state regulations. For that reason, the Council wanted to make the BOF aware of our position.

Proposal 32: 5 AAC 01.160. Fishing Seasons and Periods

PC13

The Council **unanimously** voted to **support Proposal 32**, to repeal the subsistence fishing schedule in the west of Cape Nome in Subdistrict 1 of the Norton Sound District. The Council emphasized that unfavorable, rapidly changing weather limits subsistence fishing opportunities during the current season and that the current schedule further limits subsistence opportunities for salmon fishers in these waters. The Council also noted that wet weather conditions also present additional challenges to process and preserve fish after harvest. The Council agreed that allowing for additional fishing time should not pose a conservation concern, stating that salmon are available for harvest, but inclement weather is one of the main factors limiting access to subsistence fishing under the current schedule.

The Council appreciates the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact the Subsistence Council Coordinator, Gisela Chapa, at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,



Louis H. Green
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Seward Peninsula Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Fish and Game Coordinator, Division of Wildlife Conservation, Alaska
Department of Fish and Game
Administrative Record



Alakanuk Traditional Council
68 Osier Street
PO Box 149
Alakanuk, AK 99554

PC14

October 31, 2025

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Public Comment on Proposal #15 and Proposal #16

To the Honorable Chair and Members of the Alaska Board of Fisheries:

On behalf of the Village of Alakanuk, this letter serves as formal opposition to **Proposal #15** and **Proposal #16**, scheduled for consideration at the upcoming 2025 Arctic, Yukon, Kuskokwim (AYK) meeting. As a sovereign tribal nation with a resident population of approximately 1,119, our position is firmly rooted in the health, well-being, and inherent rights of our tribal members.

For the Alakanuk Yup'ik people, salmon is not merely a food source—it is the foundation of our way of life. Salmon provides essential nutrition and economic relief in our remote community, where freight costs are exorbitant and access to commercial food sources is extremely limited. Being off the road system, our people have depended on salmon for sustenance since time immemorial. Beyond its nutritional importance, salmon holds deep cultural and spiritual significance, forming the heart of our traditions, ceremonies, and seasonal cycles.

We have several serious concerns regarding these proposals:

- **Disproportionate Burden:** Proposals #15 and #16 place additional and unwarranted restrictions on subsistence users—people who are already heavily burdened by existing regulations. The current U.S.-Canada agreement, including the seven-year moratorium, already places immense strain on our tribal members and residents. Implementing these new proposals would further intensify that hardship, which we view as unjust and inequitable.
- **Failure to Address Root Causes:** These proposals fail to consider the full range of scientific and biological factors that contribute to salmon declines. Habitat loss, permafrost degradation, sewage discharge, predator population changes, hatchery impacts, disease, and the accelerating effects of climate change are all critical factors that must be addressed. Singling out subsistence harvesters ignores these complex and interconnected causes and is scientifically unsound.
- **Cultural and Social Harm:** Subsistence fishing is far more than a means of obtaining food—it is the cultural foundation that sustains our values of sharing, respect, and family unity. Restricting subsistence harvest undermines our culture, weakens community bonds, and



Alakanuk Traditional Council
68 Osier Street
PO Box 149
Alakanuk, AK 99554

threatens the continuation of our traditional way of life. Both federal and state laws recognize and protect our right to engage in these practices.

• **Economic Consequences:** Additional restrictions on subsistence harvest would have devastating economic impacts. The high cost of living in rural Alaska already forces our residents to rely heavily on traditional harvests to survive. Further restrictions would increase food insecurity and deepen existing hardships.

Given the management measures already established under both state and federal oversight, we believe Proposals #15 and #16 are **unnecessary, unjustified, and harmful** to the well-being of our people. The Village of Alakanuk respectfully urges the Board of Fisheries to **oppose** these proposals and to instead pursue a holistic management approach—one that addresses the full spectrum of environmental, ecological, and climatic factors affecting salmon populations rather than placing the blame and burden on subsistence users.

Thank you for your attention to this matter and for your continued service to Alaska's fisheries and the people who depend on them.

Respectfully,


Raymond J. Oney
Tribal Council President

Submitted by: David Warner

Community of Residence: North Pole

Addressing proposal 22 (and by extension 21 although I do not believe prohibiting barbed hooks is necessary) I agree it is long overdue to open Harding Lake for fishing of Northern Pike. I believe the population and habitat (including spawning habitat) have rebounded to an appropriate level based upon anecdotal evidence from field observations. The lake already has a hook restriction in place to protect the lake trout population, so the same restriction could be extended for Northern Pike to minimize damage to the fish and decrease the risk of delayed mortality. The Tanana drainage has a glaring lack of gamefish compared to the rest of the state, and Northern Pike play a key role in sport fishing opportunities given that they are a large native fish to the region. I believe a catch and release fishery on Harding Lake will be beneficial to sport anglers, have a minimal impact on the Northern Pike population, and will take some pressure off of the Lake Trout population on the lake which gets a high amount of pressure given the relative close proximity to Fairbanks. If given the opportunity to fish for Northern Pike instead of Lake Trout, I believe many anglers will choose to target Northern Pike, distributing the angling pressure on the lake across more species and areas.

Nov 3, 2025

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
1255 W. 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: 2025 Alaska Department of Fish and Game AYK Proposals 15, 16, and 17

Dear Chairperson Carlson-Van Dort and Members of the Board,

The Yukon River Inter-Tribal Fish Commission (YRITFC) hereby submits this public testimony in opposition to AYK Board of Fisheries Proposals 15 and 16 as currently written.

We, the sovereign Tribes of Alaska and First Nations of Canada along the Yukon River watershed, recognize our responsibility and authority to exercise our sovereign tribal rights as stewards of our traditional territories and resources. For millennia, we have respectfully cared for the fish of the Yukon River watershed based on distinct customary and traditional Indigenous knowledge and practices. Our fisheries are essential to our cultural, nutritional, economic, and spiritual well-being and way of life.

The YRITFC has recently undergone significant transitions, including separating from the Tanana Chiefs Conference and hiring a new Executive Director. Furthermore, our communities are currently grappling with the hardships brought by recent storms, which have placed immense stress on our resources and people. In light of these challenges and our commitment to unified action, our Executive Council requires additional time to build consensus on Proposals 15 and 16.

Our primary concern with Proposals 15 and 16 is that they contribute to the excessive regulation of our Tribes and subsistence users, effectively regulating us into hunger. This pattern of regulation fails to support our inherent sovereignty and disregards our recognized authority for co-management of these vital resources. We are bearing a disproportionate burden of conservation efforts. At the same time, other sectors, such as open-ocean trawlers and those operating under the North Pacific Fishery Management Council (NPFMC), are not being held equally accountable for their impacts on salmon stocks. The problem is not us; subsistence users take less than 1% of the overall harvest.

These proposals are a reaction to the failures of Western governance, rather than solutions grounded in our Indigenous Knowledge (IK). They are being developed without sufficient recognition of Tribal stewardship and the long-standing calls from our communities for more conservative management practices and for the State to actively defend subsistence protections at the federal level. The "one-size-fits-all" approach reflected in these proposals is inappropriate for the diverse needs and place-based understandings across the vast Yukon watershed.

Therefore, the YRITFC respectfully requests that the Board of Fisheries take action during the AYK BOF meeting to delay decisions on Proposals 15 and 16. We urge the Board to move these proposals to the statewide meeting. This deferral will provide the necessary time for the YRITFC to collectively build consensus and develop a rationale that truly unites our Tribes along the Yukon River, rather than dividing the upper and lower river communities (e.g., EIRAC vs. WIRAC). This additional time will allow our Advisory Councils and member Tribes to gather, deliberate, and return with more meaningful engagement and constructive solutions that uphold our self-governance and ensure sustainable stewardship for all.

Yukon River Inter-Tribal Fish Commission Request to Amend Proposal 17

To the Alaska Department of Fish and Game Board of Fisheries,

The Yukon River Inter-Tribal Fish Commission (YRITFC) respectfully requests an amendment to Proposal 17 to expand its application to the watershed-wide level. The YRITFC strongly supports the intent of Proposal 17 but believes its effectiveness can be significantly enhanced by extending its provisions to cover the entire Yukon River watershed.

This amendment is crucial for several reasons:

- **Promoting Co-Management and Tribal Sovereignty:** Expanding Proposal 17, on a watershed-wide scale, will enable a unified tribal approach to co-management. It acknowledges and upholds our inherent tribal sovereignty and our right to manage our resources in accordance with distinct customary and traditional Indigenous knowledge and practices. This promotes self-governance and ensures that the regulations are developed in partnership with those who have stewarded these lands and waters for millennia.
- **Targeted and Controlled Harvest:** We advocate for controlled, targeted take opportunities, using appropriate gear types, as a viable alternative to broad,

one-size-fits-all closures and regulations that often prove ineffective and punitive. The current regulatory framework, which sometimes allows for longer nets and relies on problematic self-reporting mechanisms, contributes to unintended waste and creates issues for our tribal members. Expanding Proposal 17 will enable a more precise and effective conservation strategy.

- **Ending the Criminalization of Tribal Members:** The current regulatory environment often inadvertently criminalizes our tribal members for engaging in subsistence activities essential for their families' food security and cultural well-being. By supporting controlled, locally informed harvest opportunities, we can move away from enforcement models that disproportionately burden our communities and instead foster a framework that respects and upholds our inherent rights.
- **Addressing Root Causes, Not Just Symptoms:** While the proposals highlight the critical danger of extinction for fall chum stocks, it is imperative to recognize that the primary issues do not originate solely within the watershed. The real challenges lie within the broader framework of the Alaska Constitution, federal regulations, and the unchecked bycatch allowed by industrial fisheries. It is an unacceptable burden for Tribes to bear the brunt of conservation efforts while other industries continue to operate with significantly less accountability. Meaningful conservation requires equitable accountability across all sectors that impact salmon stocks, including the North Pacific Fishery Management Council (NPFMC) and open-ocean trawlers.

Therefore, the YRITFC urges the Board to amend Proposal 17 to include a watershed-wide application, thereby supporting a proactive, tribally-led approach to resource management that respects our rights, ensures food security, and genuinely contributes to the long-term health of the Yukon River fisheries. We stand ready to collaborate with the Board to develop language for this amendment that reflects our unified tribal perspective and commitment to sustainable stewardship.

Ana Basi'/Mahsi' Cho/Quyana,



Robert Charles Wright Sr
YRITFC Chair and Executive Director



(907) 438-2312 PHONE
(907) 438-2512 FAX
P.O. Box 88
ST. MARY'S AK 99658

Date: November 3, 2025

TO: Board of Fisheries

FROM: Richard Alstrom, Tribal Administrator

RE: Yukon River Subsistence Fisheries – Opposing Proposals 15 & 16

The Yupiit of Andreafski, a federally recognized Alaska Native village located in St. Mary's on the mid-Lower Yukon River, opposes Proposal 15 & 16, both of which would amend 5 AAC.01.249 and close the Yukon River to fishing during the fall chum run. Both of these proposals are unnecessary and would deny our tribal members an opportunity to harvest other species of fish or even fall chum salmon if the anticipated runs are more than projected.

The current management plans already have guidelines to open or close the fishery or provide for a restricted mesh size based on pre-season projections and in-season management also provides fish managers the ability to allow for a fishing opportunity. This flexibility would be lost under the two proposals.

There are a lot of other factors that affect the return of salmon and, historically, there is no guarantee that closures will help increase their return. Proposals 15 & 16 would only exacerbate the hardship we've been enduring for years and years under the current restrictions. We urge the BOF to reject them and maintain the flexibility given to fish managers under the current regulations so we can at least have the opportunity to harvest a few salmon when their returns are better than projected.