



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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Submitted online through Comment Portal

September 29, 2021

Simon Kinneen, Council Chair, and Council Members
North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, Alaska 99501

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Dear Chair Kinneen and Dr. Balsiger and Council members,

The Yukon River Drainage Fisheries Association (YRDFA) is a federally recognized 501 (c)(3) non-profit association of subsistence and commercial fishers with the mission of protecting and promoting all healthy fisheries and cultures along the Yukon River drainage. This longest salmon migration in the world provides critical dietary and cultural support for over forty-two rural Alaskan communities and a dozen First Nation communities in Yukon Territory, Canada. For many families, the commercial harvest of chum species provides the only means of income and salmon is critical to the cultural identity and food security needs in these off-road and remote communities. YRDFA was created in 1990 to conserve Yukon River salmon runs by giving a voice to the people who have used and managed the resources for many generations. Our work has become an essential part of the communication between fishers and other agencies and organizations. Today, YRDFA stands united to provide comments on Salmon Bycatch, which is on your October 2021 meeting agenda.

Subsistence harvest of Chinook and chum salmon, a key part of Yukon River communities' diet and culture, has been drastically curtailed over the last 20 years. Commercial harvest of Chinook salmon was halted in 2007. A moratorium to not harvest Chinook salmon on the Yukon River took place in 2016. Now the 2020 & 2021 Chinook and chum salmon run sizes are at a record low. With the Chinook salmon crashes the people of the Yukon River have turned to chum salmon for their commercial and subsistence needs. Again, the 2021 run size of the summer and

fall chum were at a historic low; too low for any commercial or subsistence harvest opportunities.

As in-river users sacrifice their harvests to ensure that escapement goals are met, under the United States' treaty obligation in the Yukon River Salmon Agreement, it is unacceptable that the pollock fleet is allowed to harvest-and discard- such high numbers of Chinook salmon. While we understand that bycatch is not the only factor contributing to declines in Western Alaska salmon returns, as salmon populations struggle to recover, the burden for recovery must not be endured by Western Alaska communities alone. The lost harvest opportunity, including invaluable subsistence harvests and meeting escapement goals to Western Alaska rivers, we recommend NPFMC take emergency action to reduce bycatch to zero for the 2022 Bering Sea pollock fishery, provide a letter to NMFS supporting funding for disaster declarations and research, observations and monitoring by Tribal organizations and co-management organizations, and finally ensure Alaska Native Tribes have a meaningful voice in management.

Representing the people of the Yukon River drainage, we recommend to the Council to sacrifice their fishing in the efforts to replenish salmon stocks in the AYK region. We thank you for the opportunity to provide comments for this very important issue and for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Victor Lord".

Victor Lord, Nenana
YRDFA Co-Chair/Y-6, Seat 2

A handwritten signature in blue ink, appearing to read "Bill Alstrom".

Bill Alstrom, St. Mary's
YRDFA Co-Chair/Y-2, Seat 1