



# KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

P.O. Box 190 Bethel, AK 99559-0190 | (907) 545-7388 | info@kritfc.org | kuskosalmon.org

September 28, 2023

Mr. Bill Tweit, Vice-Chair  
North Pacific Fishery Management Council  
1007 West Third Ave., Suite 400  
Anchorage, Alaska 99501-2252

Dear Vice-Chair Tweit and Members of the Council:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC), representing 33 Federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, asks the North Pacific Fishery Management Council (Council) to **move forward regulatory action to reduce Western Alaska (WAK) chum and Chinook bycatch**. This is of utmost importance to our communities and Indigenous way of life.

Our families have spent the summer working to fill our freezers with salmon to sustain us for our long winter, now looming on the horizon. For yet another successive year, however, several of our salmon species remain depressed (*see attached 2023 End-of-Season Summary*). Though chum salmon passage at the Bethel sonar was roughly double the returns seen in the previous summer, the 240,000 fish counted in 2023 comprise a fraction of historic abundance. Preliminary in-season harvest information estimates lower Kuskokwim families met less than one-third of their chum salmon needs (Amounts Reasonably Necessary for Subsistence, ANS: 41,200–116,400 chum), and the sole weir-based chum salmon escapement goal on the Kuskokwim (Kogruklu River: 15,000–49,000 chum) was not met.

Though the Council is focused today on chum salmon bycatch management, we would be remiss to not mention the 2023 Chinook salmon season, as Western Alaska Chinook salmon abundance is among the lowest on record (*see Rabung, Chinook Index 2023 letter, September 2023*). The preliminary Chinook salmon run reconstruction of about 131,000 fish and estimated spawner abundance (escapement) of 104,000 fish signifies the co-stewardship of KRITFC and the U.S. Fish and Wildlife Service and the sacrifices of subsistence-dependent families helped meet the upper end of the drainage-wide Chinook salmon escapement goal (65,000–120,000 fish). For the 11th consecutive year, Chinook salmon harvests fell below the ANS level (67,200–109,800 fish), with a preliminary drainage-wide Chinook salmon harvest estimated at 27,000 fish. **Our Tribes urge the Council and industry to continue to review management of and minimize Chinook salmon bycatch.**

While our communities are still not harvesting the salmon that we need to support our health, traditions, and local economies, salmon bycatch in the Eastern Bering Sea (EBS) pollock fishery continues with significant waste numbers of Western Alaska salmon. Chum salmon bycatch

TELIDA | NIKOLAI | TAKOTNA | MCGRATH | LIME VILLAGE | STONY RIVER | SLEETMUTE | RED DEVIL  
GEORGETOWN | CROOKED CREEK | NAPAIMUTE | CHUATHBALUK | ANIAK | UPPER KALSKAG | LOWER KALSKAG | TULUKSAK  
AKIAK | AKIACHAK | KWETHLUK | BETHEL | OSCARVILLE | NAPASKIAK | NAPAKIAK | KASIGLUK | ATMAUTLUAK  
NUNAPITCHUK | TUNTUTULIAK | EEK | QUINHAGAK | KONGIGANAK | KWIGILLINGOK | KIPNUK | CHEFORNAK

specifically rose dramatically from 2012-2022, and the proportion of Western Alaska chum salmon (Coastal Western Alaska and Upper/Middle Yukon stocks combined) has annually averaged nearly 1 in 5 chum salmon (17.7%) caught as bycatch during this time series (*see Council staff analysis, September 2023*). This is astonishing given the tragically low chum salmon abundance our communities and ecosystems are experiencing.

**We urge the Council to continue its march forward to formally instate regulatory actions to reduce chum salmon bycatch by developing and analyzing a range of meaningful, precautionary alternatives aimed at protecting Western Alaska chum salmon.** We emphasize that these alternatives should include and be guided by Traditional Knowledge and values of our communities most impacted by the chum salmon crisis.

In addition to our EIS scoping comment submitted alongside several partners on September 15, 2023 (*see attached*), we emphasize the need for **holistic approaches to analyzing Western Alaska chum salmon abundance**. The most meaningful chum salmon bycatch management would be linked to in-river abundance, and the most meaningful abundance metrics would include an amalgam of salmon monitoring projects. For instance, Council staff indicates that the Bethel Test Fishery (BTF) cumulative CPUE data is sufficient to providing an index of Kuskokwim chum salmon abundance. Yet KRITFC knows from our own fisheries management experience the importance of utilizing multiple sources—not a single source—of information to combat the uncertainty inherent in fisheries management. We encourage the Council to create an index that also includes data from the Bethel sonar, weirs, and, importantly, Traditional/Indigenous Knowledge.

We also encourage the Council to **link low chum salmon abundance to the failure to attain the lower end of established ANS levels and escapement goals in Western Alaska**. Doing so will connect EBS fisheries management with the health of our communities and ecosystem and with in-river fisheries management, hopefully addressing the very heart of our collective attention.

We look forward to working further with the Council and the National Marine Fisheries Service to find meaningful, equitable ways to reduce chum salmon bycatch.

Quyana, Tsen'anh,

A handwritten signature in black ink, appearing to read 'Jonathan Samuelson', written in a cursive style.

Jonathan Samuelson  
Chair, KRITFC

# 2023 END-OF-SEASON SUMMARY



**KUSKOKWIM RIVER**  
INTER-TRIBAL FISH COMMISSION

This summary provides an overview of the 2023 season, highlighting the Kuskokwim River Inter-Tribal Fish Commission (KRITFC) fisheries management and conservation efforts.

## CO-STEWARDSHIP OF THE 2023 SALMON RUNS:

The U.S. Fish and Wildlife Service–Yukon Delta NWR and KRITFC co-stewarded the 2023 salmon season in Federal waters of the Kuskokwim under a Federal Temporary Special Action issued by the Refuge Manager. The Federal Special Action was in effect from June 1 to August 13 to provide conservation and limited fishing opportunities in our longest season of co-stewardship yet.

The Refuge Manager determined that Federal management was necessary in 2023 for the conservation and the continuation of subsistence uses for Chinook, chum, and coho salmon within the Federal public waters of the Kuskokwim River drainage. This 2023 Special Action was based on the provisions of Title VIII of the Alaska National Interest Lands Conservation Act, a delegation of authority letter from the Federal Subsistence Board and in consultation with the KRITFC.

*The overall aims of the KRITFC-USFWS 2023 approach to management were to:*

- Take precautionary actions to continue to rebuild Chinook and chum salmon populations by meeting escapement goals while providing subsistence harvest opportunities to the extent practicable.
- Encourage the harvest of sockeye salmon later in the season and with selective gear while protecting Chinook and chum salmon.
- Protect coho salmon until the strength of the coho run could be determined.

Additional information about the KRITFC-USFWS approach to management is found in our "Kuskokwim River Salmon Management Strategy."

Representatives from both USFWS-YDNWR & KRITFC met weekly during the time period the Federal Special Action was in effect. A total of 18 fishing opportunities were announced between June 1 and August 12.

## HARVEST OPPORTUNITIES:

- 16-hour setnet only- June 3, June 6, June 9
- 12-hour drift net/setnet- June 12, June 17, June 23, August 3, 9, and 12
- Kalskag line to Aniak opened to 24/7 gillnet fishing on June 20
- 24-hour setnet only- June 30 through July 1, July 7 through July 8
- 8-hour setnet only- July 4 through July 6
- 6-hour drift net/setnet- July 11
- 6-hour setnet only- July 24, July 26
- 12-hour setnet only- July 17, July 19, July 21
- Tributary rod and reel opened August 1

2023 Lower River Harvest Estimates (Tuntutuliak to Tuluksak) - KRITFC + ONC + USFWS Data

|                      | CHINOOK SALMON HARVEST | CHUM SALMON HARVEST | SOCKEYE SALMON HARVEST | COHO SALMON HARVEST | TOTAL SALMON HARVEST |
|----------------------|------------------------|---------------------|------------------------|---------------------|----------------------|
| <b>TOTAL HARVEST</b> | 21,055                 | 11,929              | 28,936                 | 7,425               | 69,346               |

# CHINOOK SALMON OVERVIEW:

2023 marks the 10th consecutive year of Federal management of the Kuskokwim River Chinook salmon run within federal waters. As a result of precautionary management and huge sacrifices by subsistence users during this period, this is also the **10th successive year in a row of achieving escapements** within or above the Chinook salmon drainage-wide escapement goal range (Figure 1). ADF&G's 2023 preliminary estimate of the drainage-wide escapement is about 104,000 Chinook salmon (Figure 1) (95% confidence bounds: 71,844-146,604), which is slightly below the escapement target of 110,000 listed in our 2023 Management Strategy but within our target range of 100,000-120,000 Chinook.

As a result of sacrifices by subsistence harvesters, the drainage-wide Chinook Escapement Goal was achieved for the past decade including 2023.

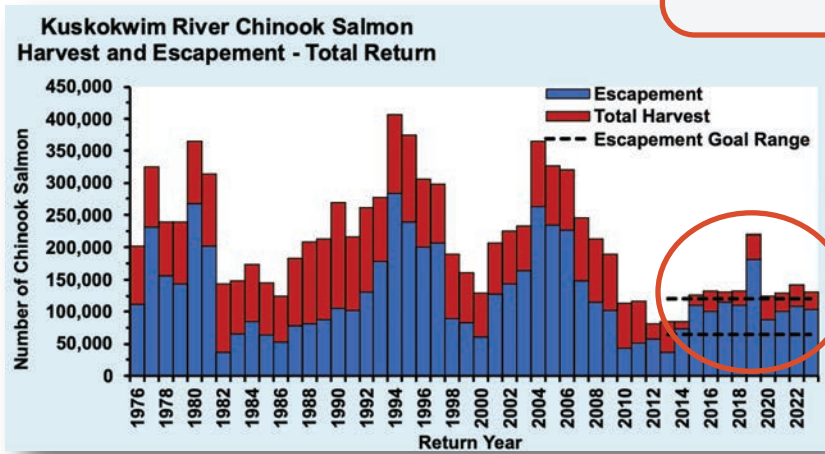


Figure 1: Kuskokwim River Chinook salmon harvest and total return, 1976-2023. Estimates for 2023 escapement and harvest are preliminary.

**BERING SEA BYCATCH**

2023 **CHINOOK** Bycatch  
**11,700**  
 (Includes Coastal Western AK, Asian hatchery, and other stocks)

As of September 21, 2023

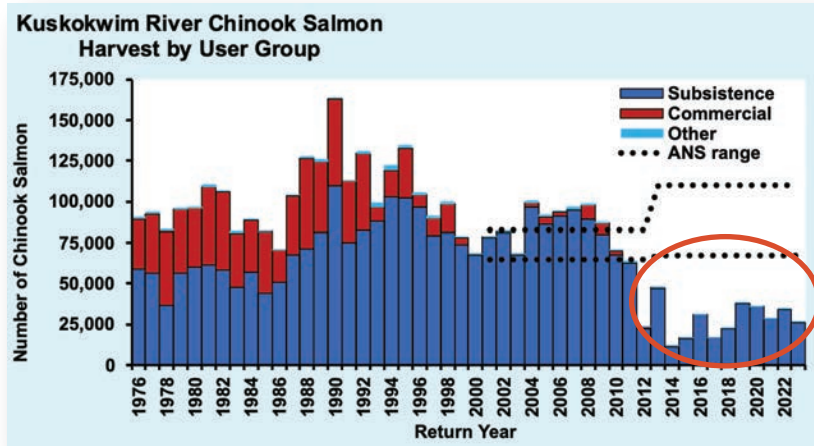
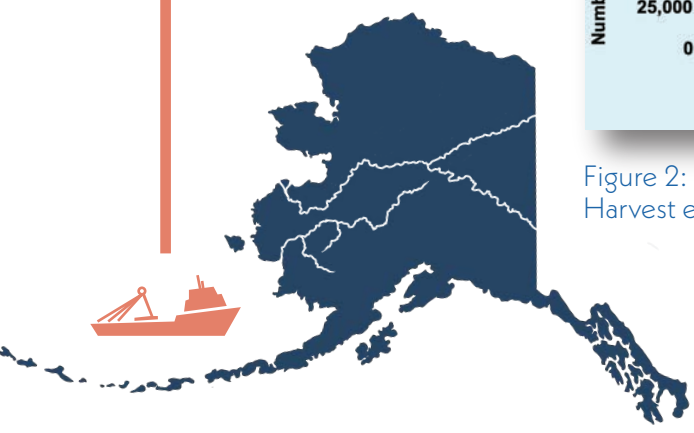


Figure 2: Kuskokwim River Chinook salmon harvest: 1976-2023. Harvest estimate for 2023 is preliminary.

To meet escapement goals, "Amounts Reasonably Necessary for Subsistence" have not been met since 2010.



## CHUM SALMON OVERVIEW:

Kuskokwim River chum salmon populations continue to be depressed (Figure 3). **Chum salmon passage at the Kuskokwim River sonar was about 240,000** (Figure 3). While this 2023 estimate was about twice the chum passage in the previous year, our chum salmon abundance remains far below their long-term levels. To increase protection of chum salmon escapement, subsistence gillnet fishing for sockeye salmon concurrently running was significantly restricted. The preliminary subsistence **harvest estimate for chum salmon is about 11,900 fish, representing 29% of the lower end of the ANS range.**

### 2023 KUSKOKWIM RIVER CHUM SALMON SONAR PASSAGE AND ESCAPEMENTS COMPARED TO LONG-TERM ESCAPEMENTS

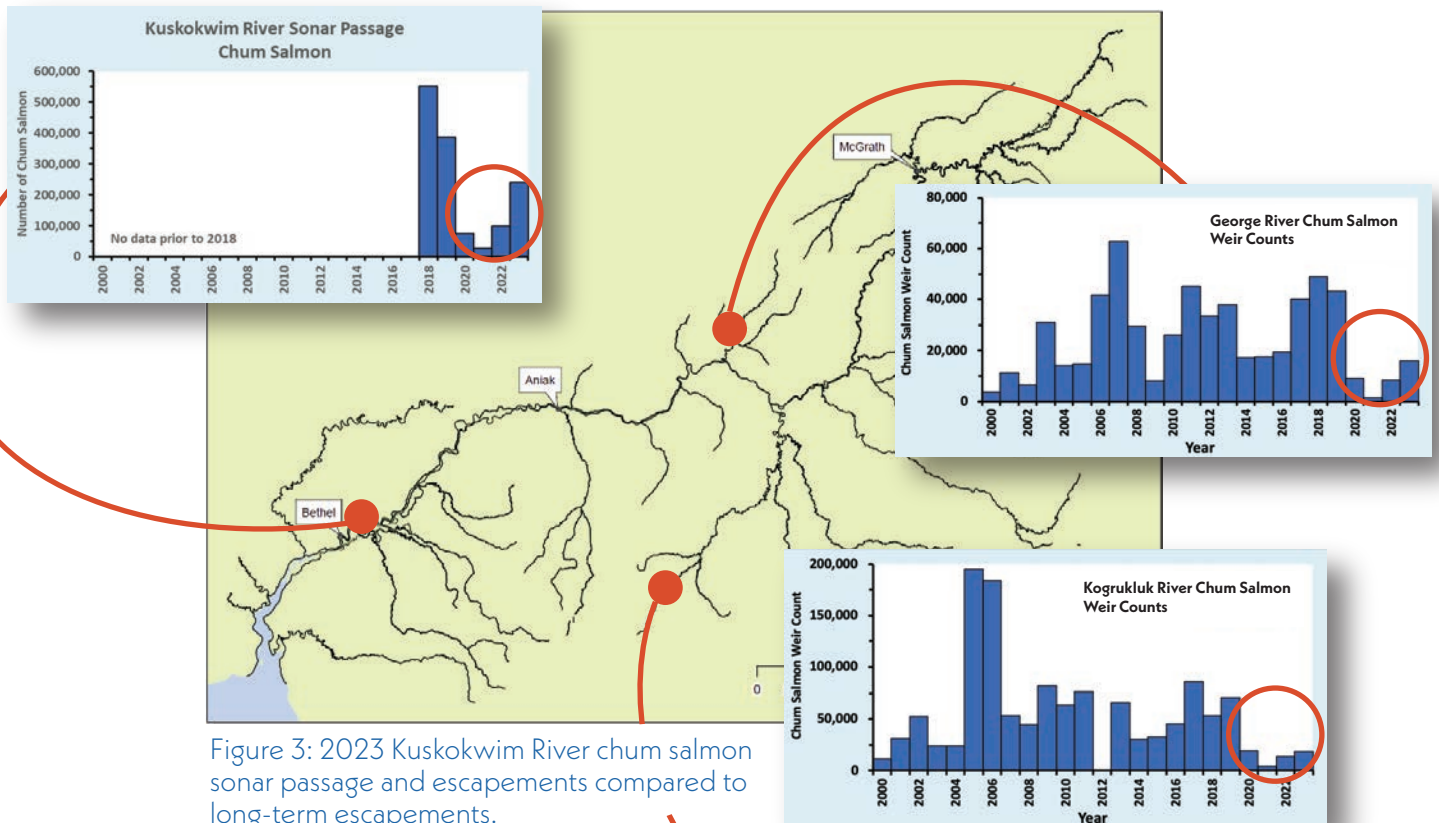


Figure 3: 2023 Kuskokwim River chum salmon sonar passage and escapements compared to long-term escapements.

### BERING SEA BYCATCH

Total  
2023 **CHUM** Bycatch  
**110,900**

(Includes Coastal Western AK, Asian hatchery, and other stocks)



As of September 21, 2023

### AREA-M JUNE HARVEST

Total  
2023 **CHUM** Intercept  
**198,700**

(Includes Coastal Western AK, Asian hatchery, and other stocks)





## **SOCKEYE SALMON OVERVIEW:**

The 2023 Kuskokwim River sockeye salmon run was again very large compared to other salmon species. The Kuskokwim River sonar passage in 2023 was about 903,000 sockeye salmon, the largest since the sonar project began and 29% larger than average passage in the previous 5 years. Preliminary inseason harvest estimates by subsistence gillnets totaled around 29,000 sockeye salmon. Given the relative abundance of sockeye salmon compared to Chinook and chum, KRITFC and YDNWR promoted sockeye harvest by alternative gears such as dipnets, but total harvest estimates are not yet available.

## **COHO SALMON OVERVIEW:**

After two years of very weak runs, the 2023 Kuskokwim River coho showed significant improvement during the period of Federal management. The Kuskokwim River sonar passage in 2023 was 372,000 coho salmon, the largest in the past 4 years. The cumulative CPUE for coho salmon in the Bethel Test Fishery was the largest since 2015, and 39% larger than the long-term average. Note that the duration of the coho salmon return extends well past operation of both BTF and the sonar project. A minimum total of 7,400 coho salmon were harvested by subsistence gillnets during the period of federal management. This was the first year of estimating inseason coho harvests and more harvesting occurred beyond the duration of the harvest estimation program.

## **ACKNOWLEDGEMENTS**

*We gratefully acknowledge the hard work the following individuals who made fisheries Co-Stewardship on the Kuskokwim River successful in 2023:*

**KRITFC In-Season Managers & Elder Advisors:** Betty Magnuson, Megan Leary, (alternate: Tracy Simeon), Mike Williams Sr., Henry Hunter Sr. (alternate: Ralph Nelson), Paul Cleveland, James Nicori and Robert Lekander

**YDNWR Fisheries Team:** Boyd Blihovde, Spencer Rearden, Aaron Moses, Christopher Tulik, Emmitt Nicori, Christian Alexie, Laurie Boeck

**Community-Based Harvest Monitors:** 2023 in-season harvest estimates were made possible by the hard work of following fourteen KRITFC harvest monitors hired in eight villages.

|                               |                              |
|-------------------------------|------------------------------|
| James Heakin - Eek            | Alfred Epchook - Kwethluk    |
| Sherrie Heakin - Eek          | Elizabeth Phillip - Kwethluk |
| Brianna Pavila - Tuntutuliak  | Kyra Phillip - Akiachak      |
| Isaiah Pavila - Tuntutuliak   | Moselle Alexie - Akiachak    |
| Peter Nelson - Napakiak       | Karleen Lake - Akiak         |
| Kimberly Nicholai - Napaskiak | Carl Napoka, Jr. - Tuluksak  |
| Wesley Nicholai - Napaskiak   | Wilfred Waska - Tuluksak     |





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September 15, 2023

Gretchen Harrington, Assistant Regional Administrator  
Sustainable Fisheries Division, Alaska Region NMFS  
Attn: Susan Meyer  
PO Box 21688  
Juneau, AK 99802-1668

Dear Ms. Harrington,

The Association of Village Presidents (AVCP), Bering Sea Fishermen's Association (BSFA), the Kuskokwim River Inter-Tribal Fisheries Commission (KRITFC), Tanana Chiefs Conference (TCC), Yukon River Inter-Tribal Fish Commission (YRITFC) and Yukon River Drainage Fisheries Association (YRDFA) jointly provide comments to the National Marine Fisheries Service (NMFS) on the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for Minimizing Non-Chinook Salmon Bycatch in the Bering Sea Pollock Fishery in the Bering Sea/Aleutian Islands Fishery Management Plan Area.

AVCP is an ANCSA regional non-profit and tribal consortium of the 56 Tribes of the Yukon-Kuskokwim Delta region. BSFA is a non-profit fisheries association serving the needs of Western Alaska commercial and subsistence fishermen. KRITFC is a consortium of 33 federally-recognized Tribes working together toward unified salmon co-management, research, and monitoring, TCC is a consortium of 42 Tribes residing in the Yukon River Watershed and is an Alaska Native non-profit corporation, charged with advancing Tribal self-determination and enhancing regional Native unity, YRITFC is a consortium of 33 Tribes that reside along the Yukon River, from the Canadian border to the mouth of the Yukon and YRDFA is an association of commercial and subsistence fishers on the Yukon River.

Salmon are essential to the food security and culture of Indigenous people who have been stewards of the Bering Sea region since time immemorial. Salmon play an important role in the ecosystem, connecting both marine and freshwater systems. Despite their cultural, economic and

ecological importance, both chum and Chinook salmon stocks in Alaska are declining; many are in a multi-year decline. From 2020-2022, all Western Alaska areas experienced a precipitous decline in chum salmon run sizes, and some chum returns were the lowest on record. Western Alaska Chinook salmon runs in 2020 and 2021 were the poorest observed over the past 40 years, and despite complete closures or substantial restrictions to all directed Chinook salmon harvest, too few salmon returned to Western Alaska in 2021 and 2022 to meet escapement goals in almost all areas of Western and Interior Alaska. This decline continued in 2023 and is expected to continue in years following; we are in the midst of a salmon crisis.

There are few words that can capture the grief, anxiety, and hunger caused by severe closures of our subsistence and commercial fisheries, but it suffices to say the shocking loss of salmon is palpable throughout communities in Western Alaska. For more information, data, and testimony about these declines across Western Alaska, we direct you to a few examples of Tribal publications and reports: including the 2015 Kawerak report, [“Always taught not to waste,” Traditional Knowledge and Norton Sound/Bering Strait Salmon Populations](#), the [2022 Kuskokwim River Salmon Situation Report](#), the [2022 Ecosystem Status Report](#), p.26-27), [State of Alaska’s Salmon and People](#).

Chum salmon bycatch in the EBS pollock fishery increased dramatically from 2012-2021 ([NOAA 2023](#)). From 2019-2022, concurrent with record low chum abundance, chum bycatch continued to increase and averaged over 355,000 chum annually. In 2021, chum bycatch was the second highest on record or over 545,000 chum. These numbers are staggering in magnitude and impact. Pollock fishery bycatch data demonstrate unequivocally that chum salmon bycatch increased in the 10 years after Amendment 110 was put in place and, therefore, the current incentive-based system is not sufficient on its own to reduce chum salmon bycatch.

Genetic data from [Barry et al. 2023](#) presented at 2023 North Pacific Fishery Management Council (Council) meetings confirmed that approximately 21% of chum bycatch during the 2022 B-season were Western Alaska chum. This is consistent with the long-term average Western Alaska chum genetic proportions 2011-2022 and indicates that Western Alaska chum compose a significant portion of overall annual chum bycatch, especially in genetic sampling area Clusters 1 and 2 ([Barry et al. 2023](#)). These numbers represent a significant proportion of Western Alaska chum populations caught as bycatch instead of returning to spawn in natal rivers.

NMFS and Council action is urgently needed to protect Western Alaska chum salmon, and it is critical that measures are put in place now to prevent more years of near-record high chum salmon bycatch while communities along Yukon, Kuskokwim and Norton Sound Rivers are unable to put food in our freezers and practice our traditional ways of life.

We therefore urge NMFS and the Council to address the following items in an EIS for Minimizing Non-Chinook Salmon Bycatch in the Bering Sea Pollock Fishery in the Bering Sea/Aleutian Islands Fishery Management Plan Area:

- **We do not support taking a status quo approach as presented in Alternative 1.**



- **An overall or Western Alaska chum Prohibited Species Catch (PSC) limit, as presented in Alternatives 3 and 4, must be low enough to have a meaningful impact short- and long-term. A high static cap will have no conservation outcome for communities that depend on salmon returns as a way of life.** The values suggested in the 2023 April Council motion call out “average” bycatch levels to be analyzed from 2011-2022. However, during that 12-year time period, chum bycatch was well-above (nearly double) the long-term average from 1991-2022. This sets a dangerous precedent for selecting an “average” PSC limit based on historically high and unacceptable levels of bycatch. For PSC limits to be impactful, they must be low enough to effectively alter the pollock fleet’s fishing behavior.
- **A chum PSC cap should be linked with chum abundance to the extent possible.** At times of very high abundance, it makes sense to ease PSC restrictions, and at times of low and very low chum abundance, PSC limits should be ratcheted down to better account for salmon sustainability as well as community and subsistence needs. Regardless of high or low abundance, PSC caps should still be meaningful to reduce overall chum salmon bycatch, as well as consider other PSC and bycatch species like Chinook salmon, halibut, herring, and sablefish.
- **A chum salmon abundance index should consider both escapement and the subsistence needs of fishery-dependent communities.** To be more equitable, NMFS and the Council must concede that the unique life history of salmon and the ecosystems and people dependent upon them necessitates a comprehensive, gravel-to-gravel approach to management. When escapement goals are consistently not met and communities are significantly below their subsistence harvest goals (as measured by Amounts reasonably Necessary for Subsistence, or ANS), managers are not fully evaluating the systems impacted by their decisions. Bycatch is one of the few salmon life-stage specific mortalities that managers can control, and NMFS and the Council must do more to reduce Western Alaska chum salmon bycatch in a way that is responsive to community and ecosystem needs.
- **We support the priority stated in the Notice of Intent and Purpose and Need to focus this action on reducing bycatch of chum salmon of Western Alaska origin.** Advances in genetic sampling indicate there may be significant spatial trends in chum bycatch in the pollock fishery. For instance, Western Alaska chum is a greater proportion of overall chum bycatch in certain areas, especially in genetic sampling area Clusters 1 and 2 ([Barry et al. 2023](#)). It follows that management measures to reduce chum bycatch should utilize spatial, temporal and thermal trends in extant data to identify ways to maximize reductions in Western Alaska chum bycatch specifically. We encourage NMFS and the Council to consider emerging technologies, such as genetic sampling, proactively in the EIS so that the document is forward-thinking and responsive to the development of more precise management tools longer-term.
- **Time and area closures must also be considered *in addition* to a PSC cap.** The migratory behavior of chum salmon lends itself to an evaluation of time and area closures as part of the analysis. For instance, findings from [Barry et al. 2023](#) indicate that early B-

season tends to see higher proportions of Western Alaska chum, especially in genetic sampling or Cluster Area 1. Focusing timed closures in areas with high Western Alaska chum salmon bycatch rates will ease choke points for returning chum salmon and will allow the most fit individuals to return to their natal rivers to spawn or provide for subsistence users.

- **Additional regulatory requirements to the pollock industry’s Incentive Plan Agreements (IPA) are insufficient to ensure meaningful reduction of chum salmon bycatch now and in the future.** As previously stated, the increase in overall non-Chinook salmon bycatch after the implementation of Amendment 110 and its reliance on IPA-level chum salmon avoidance demonstrates the inadequacy of the industry to reduce chum salmon bycatch without rigorous Tribal, agency, Council, and public oversight and pressure. We do not support Alternative 4 to insert regulatory requirements into the IPAs without also implementing provisions in Alternatives 2 and 3, including a PSC cap linked to Western Alaska chum salmon abundance and time and area closures.
- **An EIS must equitably address cultural, spiritual and social impacts to subsistence users associated with salmon declines.** While there are economic impacts to communities associated with commercial and subsistence fishery closures, the catastrophic impacts of these closures extend well beyond economics. Traditional and Indigenous Knowledge should be a key component of an EIS and its analysis of social and environmental impacts of salmon bycatch in the pollock fishery, especially as it relates to impacts to Western Alaska coastal and rural communities.

An Elder from the Kuskokwim cautions us “to look at both ends” to address controllable causes of salmon declines, from the beginning of the salmon’s life in Alaskan rivers, through its migrations in the North Pacific, and back to freshwater. As AYK Tribes and communities partake in the conservation of chum salmon stocks through restrictions to our subsistence and commercial fisheries, we impart this caution to NMFS as the agency begins this scoping and EIS process. It is imperative that this analysis comprehensively address the Bering Sea pollock fishery’s contributions to Western Alaska chum salmon declines, and work with Tribes to construct meaningful, equitable, and far-sighted mechanisms to control these impacts.

Sincerely,



Vivian Korthuis, CEO, Association of Village Council Presidents



Amy Sparck, Executive Director, Bering Sea Fishermen’s Association



Kevin Whitworth, Executive Director, Kuskokwim River Inter-Tribal Fish Commission



Brian Ridley, Chief/Chairman, Tanana Chiefs Conference



Karma Ulvi, Chair, Yukon River Inter-Tribal Fish Commission



Gabe Canfield, Policy Coordinator, Yukon River Drainage Fisheries Association