



# 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](mailto:info@kritfc.org) | [kuskosalmon.org](http://kuskosalmon.org)

June 2, 2022

Simon Kinneen, Chair  
David Witherell, Executive Director  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501

**Subject: KRITFC Public Comment for June 2022 Council Meeting**

Dear Chair Kinneen and Mr. Witherell,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) urges the North Pacific Fishery Management Council (Council) to take immediate and extensive action to reduce Chinook and chum salmon bycatch to zero; set a cap on chum salmon bycatch; and include Alaska Natives in management decisions.

KRITFC, based in rural Western Alaska, represents the 33 Federally recognized Tribes of the Kuskokwim River drainage in fisheries management, research, and monitoring. Since 2015, KRITFC has participated with Federal, State, and Tribal managers and regional stakeholders to conserve and rebuild Kuskokwim salmon populations, specifically Chinook salmon and, more recently, chum salmon. All of KRITFC's work is guided by our Yupik and Athabascan Dené values, which call for unity, sharing in abundance and scarcity, and avoiding all waste.

Now in its eighth year of collaborative management with U.S. Fish and Wildlife Service (USFWS), KRITFC's best efforts to restore Kuskokwim Chinook and chum salmon populations through in-river restrictions on subsistence users are not working. The 2021 Chinook salmon return, estimated at 129,000 fish (95% CI = 94,000–178,000 fish), compared with the past decade's below average returns have not met rural Tribal subsistence users' needs. The 2021 chum run was even more dramatic, recording the lowest chum salmon return ever documented; the sole tributary escapement goal on the Kogruluk River was not met (4,153 fish estimated to have escaped with an escapement goal of 15,000–49,000 fish and an average escapement of over 53,000 fish); and, by all accounts from subsistence fishermen and fisheries managers, the poorest chum salmon harvest in recent memory. Rural Tribal subsistence users' chum salmon needs were

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

far from being met in 2021. These are extensions of limited salmon returns and harvest opportunities that have been ongoing since at least 2010.

The necessity of meeting rural Tribal subsistence users' salmon needs is about more than meeting physical, nutritional needs, though it certainly includes that. Salmon is a critical form of protein, fats, and vitamins for rural Alaskans; it promotes healthy development in youth and provides food security in an area with an exorbitantly high cost of living. Beyond food, Chinook, chum, and all species of salmon are necessary components of rural Alaska Native culture, spirituality, and subsistence economies, and of Western Alaskan ecosystems. Salmon provide for the overall well-being of the people and environment of the Kuskokwim.

Rural Western Alaskans are experiencing a multi-species salmon disaster and ecosystem collapse. Without healthy, abundant salmon populations, our people are suffering from food insecurity, losing important ways of teaching traditions and culture, and lacking dried and canned fish to share and trade. The ecosystems of the Kuskokwim drainage are hurting, too, with, for example, more bears raiding fish camps and attacking moose for food. The full consequences of the lack of salmon nutrients for the land, waters, and other animals is yet to be told.

Certainly, salmon bycatch by Bering Sea-Aleutian Island (BSAI) commercial vessels is not the sole cause of declining Kuskokwim, Yukon, and Norton Sound Rivers salmon populations, nor is every bycaught salmon bound for one of our rivers. Our fishermen and biologists are convinced that climate change and ecosystem-wide dynamics are playing a role in this ongoing salmon collapse. Nonetheless, industrial over-fishing is something which people – specifically the members of this Council – have power over.

NOAA and the Council have an ongoing obligation under National Standard 9 to minimize bycatch to the maximum extent practicable. National Standard 8 requires management and conservation actions to consider effects on fishing communities, ensure sustained participation of fishing communities and, to the extent practicable, minimize adverse economic impacts on such communities. A number of Executive Orders require federal agencies to address environmental justice issues and advance racial equity.<sup>1</sup> The Endangered Species Act places additional requirements to reduce the impacts on listed stocks. Taken together, these legal mandates reinforce the need for the Council to take additional action to reduce salmon bycatch.

**Therefore, to help restore, conserve, and protect our Kuskokwim salmon, ecosystem, and ways of life, KRITFC urges the Council to consider the following actions:**

**1. The Council should use all research, funding, personnel, and management actions available to reduce BSAI salmon bycatch to zero fish.**

- This action should be immediate and extensive to prevent any more salmon bycatch from occurring in the 2022 BSAI commercial fisheries.

---

<sup>1</sup> See Executive Order 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations (Feb. 11, 1994); Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (Jan. 25, 2021).

- The Council should adopt a goal of zero salmon bycatch, commensurate with zero salmon harvest on the Yukon River in 2021 and aligned with Alaska Native the values of preventing all waste and respecting all life.

**2. The Council should establish a chum salmon bycatch cap that works to reduce bycatch to zero.**

- KRITFC looks forward to the establishment of a chum salmon bycatch cap. The Council and National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries) have the capacity and expertise to work with long-term data sets to create this number.
- The Council and NOAA Fisheries should collaborate directly with Alaska Native Tribal governments and organizations through a Tribal Consultation process to set this cap.

**3. The Council should support and pursue all avenues to include Alaska Native subsistence users in its management decisions.**

- The ecosystems of the BSAI region are intricately connected with Western Alaska ecosystems, and the people of Western Alaska are intimately tied to their ecosystems. To make decisions about BSAI intercept fisheries without consulting the terminal, in-river, Indigenous users is to deny the interconnectedness of these ecosystems and species.
- Currently, Alaska Native subsistence users can participate in the public Council process. However, under the federal trust responsibility, Alaska Natives should have government-to-government relationships with federal agencies, including NOAA Fisheries.
- NOAA Fisheries should encourage amendments to the Magnuson-Stevens Act, proposed by Rep. Jared Huffman (D-CA), to add two voting Alaska Native seats to the Council.
- The Council should form a collaborative salmon working group with Tribes, subsistence fishermen, and researchers to determine the best ways to manage the BSAI commercial fisheries and reduce salmon bycatch.
- The Council should ethically incorporate Indigenous Knowledge from Alaska Native subsistence users into its management decisions and research priorities.
- The Council should encourage ongoing NOAA Tribal Consultations with Alaska Native Tribal governments and organizations and engage with these groups itself.

We fear we are on the brink of a physical, cultural, and ecosystemic disaster. KRITFC respectfully and firmly urges the Council to utilize every action at your disposal to protect our salmon populations and salmon people. Any questions or comments can be directed to Kevin Whitworth, interim executive director, at [kevinwhitworth@kritfc.org](mailto:kevinwhitworth@kritfc.org) or 907-524-3088.

Quyana,



Mike Williams Sr.  
Chair, KRITFC