



KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

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September 29, 2021

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

Dear Mr. Kinneen and Mr. Witherell,

The Kuskokwim River drainage is experiencing a salmon disaster and ecosystem collapse. Since at least 2010, Chinook salmon returns to the Kuskokwim have been in decline, with several of the past years showing some of the lowest returns on record. In 2020 and 2021, the Kuskokwim River chum salmon returns, typically abundant and critical for the food security of subsistence fishing families and biomass in the headwaters ecosystem, crash unexpectedly.

The drastic declines of Kuskokwim Chinook and chum salmon populations severely limit subsistence fishing opportunities, represent some of the lowest harvests on record for both species, and prevent in-river commercial fisheries for either species from taking place. Furthermore, the heavy regulation of Chinook and chum salmon curtails subsistence sockeye salmon fishing due to harvest restrictions during mixed stock run timing. Without strong Chinook and chum salmon populations on the Kuskokwim, the health of subsistence communities, Alaska Native Yupik and Athabascan cultures and spiritualities, subsistence economies, and ecosystems is immensely threatened.

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) writes this letter to urge the North Pacific Fishery Management Council (Council) to take immediate and thorough action to intervene in the unfolding collapse of our river and marine ecosystems. KRITFC represents the 33 Tribes of the Kuskokwim River drainage in fisheries management 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. In 2016, KRITFC signed a memorandum of understanding with the U.S. Fish and Wildlife Service at Yukon Delta National Wildlife Refuge to establish a formal federal collaborative management partnership.

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

Despite the sustainable fisheries management KRITFC has brought to the management table for the past seven years – such as managing to the high end of the drainage-wide Chinook salmon escapement goal range, incorporating Traditional Knowledge into fisheries management, and equitably managing salmon runs for the entire river ecosystem and fishing communities – Kuskokwim Chinook and chum salmon populations are not rebuilding. This is indicative of a larger, much more complex disaster unfolding in Western Alaskan and Bering Sea ecosystems. Undeniably, several factors in the Bering Sea marine environment are affecting Kuskokwim salmon populations and the many communities of fishermen/women, mammals, migratory birds, and flora who depend on them. These factors include but are not limited to salmon bycatch in the Bering Sea pollock fishery, changing marine temperatures, and marine debris. Moreover, these factors are causing unprecedented salmon declines in parts of Western Alaska other than the Kuskokwim River, notably in the Norton Sound and Yukon River systems.

To conserve and protect our Kuskokwim salmon, ecosystem, and subsistence ways of life, KRITFC urges the Council to consider the following actions:

- 1. The Council should take emergency action to limit Chinook and chum salmon bycatch to zero in 2022 in the Bering Sea pollock fishery.**
 - We are amid a multi-species salmon collapse within the Kuskokwim River watershed.
 - Chinook and chum salmon runs throughout the Artic-Yukon-Kuskokwim region were disastrous in 2020 and 2021. Chinook and chum salmon fisheries were completely shut down or severely limited.
 - People on the Kuskokwim have lost a critical source of food and a key component of their culture. Every possible action must be taken to protect salmon stocks and ensure a collapse does not happen again.
 - Given the current state of Chinook and chum salmon, and the lack of information about why this is happening, sustainable fishery management requires that the Council limit salmon bycatch in the Bering Sea pollock fishery to ensure that NO salmon are taken as bycatch in the Bering Sea pollock fishery in 2022.
- 2. Ensure Alaska Native Tribes have a seat at the decision-making table.**
 - Support amendment to the Magnuson-Stevens Act to add 2 Tribal seats to the NPFMC table.
 - Ensure Alaska Native Tribal representation on all Council bodies, including the AP, SSC, and plan teams.
- 3. Send a letter to NMFS supporting funding for disaster declarations and research, observation and monitoring by Tribal organizations and co-management organizations.**
- 4. Support and encourage NOAA to initiate Tribal Consultation on the issue of salmon bycatch so that both NOAA and the Council have the best available information.**

KRITFC has prepared a “Kuskokwim River Chinook and Chum Salmon Situation Report” with further details about this salmon disaster and its effects on subsistence fishing communities. In light of the four aforementioned action considerations, please review the following report and

consider its testimony in Council management deliberations. As the Kuskokwim River is interconnected with the Bering Sea, any action the Council chooses to take invariably affects our salmon, ecosystem, and communities.

If the Council wishes to speak further about the issues presented here, please contact Mary Peltola, KRITFC Executive Director, at (907) 545-6206 or marypeltola@kritfc.org.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Williams Sr.", with a stylized flourish at the end.

Mike Williams Sr.
Chair, KRITFC