



# KUSKOKWIM RIVER

## INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

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September 30, 2022

Simon Kinneen, Chair  
North Pacific Fishery Management Council  
1007 West Third Ave., Suite 400  
Anchorage, AK 99501

Dr. Jon Kurland, Regional Administrator  
NOAA Fisheries, Alaska Region  
PO Box 21688  
Juneau, AK 99802

### **RE: KRITFC Written Comment, October 2022 Council Meeting**

Dear Chair Kinneen, Dr. Kurland, and Council members,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) appreciates the opportunity to provide written comment to the North Pacific Fishery Management Council (Council) at their October 2022 meeting. KRITFC represents the 33 Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, and works to protect and sustain Kuskokwim salmon fisheries and traditional ways of life.

During the 2022 salmon season, Kuskokwim fishing communities yet again experienced prolonged subsistence fishing closures due to a multi-species, multi-year salmon collapse. The entire Kuskokwim drainage was open to subsistence fishing only 40 days between June 1 and September 15 – or less than 40% of the bulk of the Chinook, chum, sockeye, and coho salmon runs. For the first time, conservation closures initially implemented to protect Chinook and chum salmon stocks extended into August to protect a record-low coho salmon return. Prolonged closures in a multi-stock fishery prevented subsistence fishing families from fishing on healthy sockeye salmon stocks and whitefish and other non-salmon species, meaning there were no backup species for subsistence users to meet their fish needs.

In its 2022 three-river index letter, the Alaska Department of Fish & Game (ADF&G) preliminarily estimates a Chinook salmon total return of 143,662 fish; drainage-wide escapement of 105,774 fish; and drainage-wide subsistence harvest of 37,848 fish. While KRITFC's and U.S. Fish and Wildlife Service's (USFWS) joint escapement goal target of 100,000–120,000 Chinook salmon is met by this preliminary escapement estimate, the total Chinook salmon run estimate still pales in comparison to run abundance before Chinook salmon declines began a decade ago. Moreover, while the estimated 2022 Chinook salmon subsistence harvest is higher than recent years, subsistence communities still did not meet their amounts necessary for subsistence (ANS) levels for Chinook salmon; instead, they harvested roughly 40% of their long-term subsistence needs, leaving a crucial unfilled gap. Similarly, with a near record-low chum salmon return and the lowest coho salmon return seen in recent memory, subsistence users harvested only a fraction of their chum and coho salmon needs and were far from meeting chum and coho salmon ANS levels.

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

Our communities, ecosystem, and entire way of life are at stake with the disappearance of our salmon. While there are many factors contributing to the decline of Western Alaska salmon, marine bycatch is directly within the Council's management jurisdiction. We look forward to further discussion of salmon bycatch at the December 2022 meeting and continue to request that Council drive Chinook salmon bycatch towards zero and set meaningful limits and controls on chum salmon bycatch. In the meantime, during this October 2022 meeting, KRITFC asks that the Council strongly consider:

- The impacts of salmon bycatch on Western Alaska subsistence users during its review of the 2023-2024 pollock fishery acceptable biological catch (ABC), overfishing limits (OFL), and total allowable catch (TAC) limits, and factor subsistence-dependent communities' and ecosystem needs into its deliberations (Agenda Item C-5).
- The impacts of climate change on salmon populations and subsistence fishing communities when reviewing the Climate Readiness Synthesis Report and Ecosystem Committee report (Agenda Items D-6 and D-7).
- Initiating a comprehensive National Environmental Policy Act (NEPA) evaluation of the impacts of our current fishery management system, given the level of change since the 2004 Programmatic Supplemental Environmental Impact Statement (PSEIS). A comprehensive evaluation could also be a space to include Traditional, Indigenous, and local Knowledge (TK/IK/LK) related to recent ecosystem changes, in light of the Council's push to include TK/IK/LK in its decision-making process. The process should begin with a scoping process and consultation with Tribes, engagement with the public, communities, and the fishing industry to identify issues and problems that need to be considered.

Quyana, Tsen'ahn, Thank you for your time and attention to our Tribal subsistence communities' needs.

Respectfully,



Kevin Whitworth  
Executive Director, KRITFC