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Dr. Richard  
Cannon

**Western Interior Alaska Subsistence  
Regional Advisory Council**  
c/o Office of Subsistence Management  
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January 30, 2009

Robert D. Mecum, Acting Administrator  
Alaska Region, National Marine Fisheries Service  
National Oceanic Atmospheric Administration  
Post Office Box 21668  
Juneau, Alaska 99802

Re: Comments and Recommendations on the Draft Environmental Impact Statement for the  
Bering Sea Chinook Salmon Bycatch Management

Dear Mr. Mecum:

The Western Interior Alaska Subsistence Regional Advisory Council has a keen interest in the sustainability of the returning salmon to Western Alaska, especially the Yukon and Kuskokwim rivers. The Regional Council again strongly recommends that the Bering Sea/Aleutian Islands pollock fishery salmon bycatch be reduced immediately. Rural subsistence and commercial fishermen across the Yukon and Kuskokwim river drainages are facing another difficult Chinook salmon fishing season in 2009 when the conservation burden to meet escapement needs in Alaska and Canada may result in subsistence families not meeting their Chinook salmon needs.

The twenty-seven villages along the Yukon and Kuskokwim rivers, within the Western Interior Region the Regional Council represents, heavily depend on subsistence caught salmon for personal and community consumption and for their livelihoods. Every community within our Region, through sharing or trading, utilizes returning salmon for a significant part of their subsistence diet. The dramatic rise in salmon bycatch, especially of Chinook salmon, by the Bering Sea/Aleutian Islands pollock fishery cannot be allowed to continue to threaten the future sustainability of the Yukon River salmon stocks and the continuation of a subsistence way of life in Interior Alaska. The continuing decline in the returning salmon stocks has to stop and a key component with reversing this decline is the immediate reduction in the BSAI Chinook bycatch.

The Regional Council appreciated the presentation from Dr. Diana Stram and Nicole Kimball, and the discussions with North Pacific Fishery Management Council members Sam Cotton and Dave Benson during our public meeting on October 27, 2008 in McGrath, Alaska. Based on the presentation and discussions, past Regional Council discussions, and personal knowledge of the

Regional Council members, the Regional Council unanimously adopted the following recommendations for the DEIS:

1. The Regional Council recommends a hard cap of 29,323, which represents the long-term historic range of Chinook salmon bycatch. A hard cap within the 10-year average 29,000 – 38,000 would be acceptable to the Regional Council.
2. The Regional Council does not support the high cap of 68,000 fish in the preferred alternative. This figure represents the average of the three highest bycatch years on record. This cap level is unacceptable.
3. If the higher cap figures are adopted, selling or trading the caps should not be allowed within the fishery. Such activity would result in reaching the higher cap figures instead of providing incentive for the fishing industry to have bycatch amounts below the caps.
4. All salmon bycatch should be processed and returned to the Alaskan communities within the rivers of origin by apportionment by percentage of the bycatch. This bycatch distribution to Alaska would not replace the subsistence activities of the people of Western and Interior Alaska.
5. The Regional Council requests a review of the pollock quota and consideration of season time reductions to protect the pollock fish stocks. Our concern is that as the desired commercial fish stock becomes less abundant more fishing effort follows, which results in additional salmon bycatch.

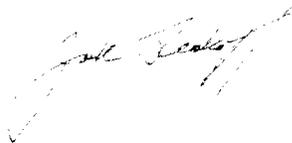
The subsistence and commercial in-river fishermen and their communities are incurring extreme expense from the increasing fishing restrictions, high fuel costs, and their decreasing catch per unit of effort from the pollock fishery's salmon bycatch. Rural villages are declining in population because of the increasing high cost of living in rural Alaskan communities. Couple these challenges with the declining size of the returning Chinook salmon and fewer large females reaching the spawning grounds and we may be looking at a serious conservation concern that may result in a serious burden on subsistence fishermen they are unable to withstand.

The Regional Council is authorized by the Alaska National Interest Lands Conservation Act and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Regional Council's charter establish the Regional Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife on public lands within the region and to provide a forum for the expression of opinions and recommendations on any matter related to the subsistence uses of fish and wildlife on public lands within the region.

Thank you for the opportunity to present the Regional Council's recommendations on the DEIS. We and the residents of the Western Interior Region look forward to a substantial reduction in the BSAI salmon bycatch. A substantial reduction would rebuild the Yukon River salmon stocks so that, first and foremost, biological escapement needs would be met, the subsistence needs of Alaska and Canada would be met, and the Yukon and Kuskokwim rivers' commercial fisheries would return. Continuation of a subsistence way of life and the economic underpinnings of our villages depend on viable and sustainable salmon stocks.

If you have any questions or need additional information please, contact me or our council coordinator, Vince Mathews (contact information in letterhead). I can be reached directly at 1-907-678-2007.

Sincerely,



Jack Reakoff, Chair

cc: Eric Olson, Chair, North Pacific Fishery Management Council  
Michael R. Feagle, Chair, Federal Subsistence Board  
Peter J. Probasco, Assistant Regional Director, Office of Subsistence Management  
Rod Campbell, Fisheries Liaison, OSM  
Larry Buklis, Chief, Fisheries Division, OSM  
Tim Jennings, Fisheries & Ecological Service, Fish and Wildlife Service  
Ann Wilkinson, Chief, Council Coordination Division, OSM  
Jill Klein, Executive Director, Yukon River Drainage Fisheries Association  
David Bedford, Deputy Commissioner of Fisheries, ADF&G  
Sue Entsminger, Chair, Eastern Interior Alaska Subsistence Regional Advisory Council  
Lester Wilde, Chair, Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Western Interior Alaska Subsistence Regional Advisory Council members