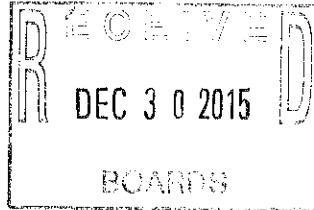


Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

RAC WI15041.MB

23 DEC 2015

Tom Kluberton, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99801



Dear Mr. Kluberton:

The Western Interior Alaska Subsistence Regional Advisory Council (Council) recently discussed several Alaska Board of Fisheries proposals affecting the Western Interior Region. I am writing to express the Council's opinions on several of those proposals.

The Council is one of ten Councils formed under the Alaska National Interest Lands Conservation Act (ANILCA). The Council is authorized by Title VIII of ANILCA to provide a forum for expressing opinions and offering recommendations on any matter related to subsistence uses of fish and wildlife within the region. The Council held a public meeting in Galena on November 3-5, 2015 to discuss matters related to subsistence in the Western Interior Region. During that meeting, the Council took public testimony and discussed Alaska State Board of Fish Proposals 123, 125, 126, 127, 128, 142, and 144, taking final action on those proposals as set forth below.

Proposal 123-Amend

The Council acknowledged the willingness to use alternate or modified gear types for the sake of Chinook Salmon conservation, but cannot support this proposal as written without thorough justification for the net specifications in this proposal, which would substantially increase harvest capacity and would result in incidental capture of Chinook Salmon in a time of conservation concern. This Council is in favor of amending the proposal to reduce the length and depth of the allowed nets to 50 fathoms and no more than 40 mesh in depth, with a 3.5" mesh size and a 2 year sunset clause to allow for reporting on the effects of the modifications.

Proposal 125-**Oppose**

This Council feels more information is needed regarding the effects of the proposed action before it can be supported, especially during this time of conservation concern. With Pink and Coho Salmon runs overlapping, fall Coho Salmon could be subject to undue bycatch if this proposal is adopted.

Proposal 126-**Oppose**

This Council believes there are not enough restrictions on the size and depth of nets being proposed, and that adopting this proposed action is not advisable at this time. Concerns exist regarding potential large mortality of Chinook Salmon and the negative effects on the users.

Proposals 127 & 128-**Oppose**

In times of critical conservation concern for salmon, this Council cannot support expanding these fishing districts to commercial fisheries. Until more information is gathered regarding the rationale behind the proposals and effects on the resources, these proposed actions are unwarranted.

Proposals 142-**Support**

The Council is in favor of allowing an additional subsistence opportunity for whitefish after August 15 in the Upper Middle Fork Koyukuk and South Fork Drainage.

Proposals 144-**Support**

The Council is in favor of allowing the use of nets to cross sloughs in non-spawning areas within the Koyukuk River drainage, as this has traditionally been done in the past.

Thank you for the opportunity for this Council to assist the Alaska Department of Fish and Game to meet its charge of protecting our sustainable resources for the maximum benefit of all Alaskans and the opportunity to comment on the Department's proposals for these important resources. We look forward to continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about the comments included in this correspondence, please contact me via Carl Johnson, Council Coordination Division Chief with the Office of Subsistence Management, at (800) 478-1456 or, (907) 786-3676.

Sincerely,



Jack Reakoff, Chair

Mr. Tom Kluberton

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cc: Western Interior Alaska Subsistence Regional Advisory Council

Federal Subsistence Board

Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management

Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management

Stewart Cogswell, Fisheries Division Chief, Office of Subsistence Management

Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management

George Pappas, State Liaison, Office of Subsistence Management

Drew Crawford, Federal Subsistence Liaison Program, Alaska Department of Fish and Game

Administrative Record