



December 20, 2011

Tri-RAC Customary Trade Committee
c/o Office of Subsistence Management
U.S. Fish & Wildlife Service
1011 East Tudor Road, MS-121
Anchorage, AK 99503

Re: YRDFA Board Comments on Tri-RAC Customary Trade Proposal

Dear Members of the Tri-RAC Committee on Customary Trade:

The Yukon River Drainage Fisheries Association (YRDFA) appreciates the opportunity to comment on the Tri-RAC committee's customary trade proposal. As you may know, YRDFA is an association of commercial and subsistence fishermen and women on the Yukon River in Alaska with a mission of promoting healthy, wild fisheries and cultures on the Yukon River. Our Board consists of 16 members and 14 alternates from each of the fishing districts on the Yukon River in Alaska as well as one non-voting member and one alternate from Canada. While our full Board of Directors has not yet had an opportunity to consider the proposal, our Executive Committee consisting of 9 of our Board members recently met and considered the committee's proposal. After much discussion, the YRDFA Executive Committee unanimously passed the following recommendations:

1. We recommend to the Federal Subsistence Board that whatever they do regarding customary trade restrictions, it be only in times of shortage—when there is no Chinook salmon commercial fishery and restrictions on subsistence fishing.
2. The YRDFA Executive Committee recommends that if conservation measures are necessary, subsistence periods should be reduced or shut down rather than addressing customary trade specifically.

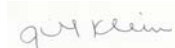
While the Executive Committee did not have consensus to support either of the options put forth by the Tri-RAC Committee, everyone present felt that if either of these measures or other restrictions on customary trade are put in place that it should only be in times of shortage. When/if harvests are restored and there is a Chinook salmon commercial fishery and no restrictions on subsistence the restrictions on customary trade should be lifted as well.

The second recommendation of the Executive Committee focused on the idea that the tool of reducing subsistence periods is one which already exists for limiting harvest. Reducing subsistence fishing periods would have the ultimate effect of reducing customary trade harvest as well and in some areas could be a less disruptive means of restricting customary trade than the options presented.

While this represents our recommendations at this time, YRDFFA plans to consider and comment on the final proposal to the Federal Subsistence Board at the appropriate time.

If you have any questions or would like additional information please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jill Klein". The signature is written in dark ink on a light-colored background.

Jill Klein

Executive Director