

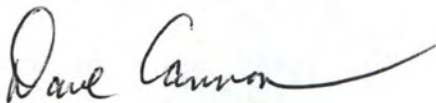
February 27, 2014

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section

Dear Chairman Johnstone,

The Kuskokwim Salmon Management Working Group would like the Board of Fisheries to consider two Emergency Petitions, which are enclosed, at the upcoming Board of Fisheries Meeting.

Sincerely,



Dave Cannon  
Middle River Subsistence Representative – KSMWG  
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Chairman Karl Johnstone  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK  
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Dear Chairman Johnstone:

The purpose of this letter is to request the Alaska Board of Fisheries (BOF) to consider an emergency petition to add the additional gear limitation of 25-fathom net length during times when the commissioner determines it to be necessary for the conservation of king salmon. This request would be added as a legal gear option for Emergency Order gear restrictions 5AAC 01.270 (n) the following option:

(4) a gillnet may not exceed 25 fathom in length.

We believe that an emergency action by the Board of Fish is warranted in accordance with AS AAC 96.625 which states:

In this section, an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a **biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.**

The Working Group justifies this request for emergency action based on our conviction that an emergency exists pertaining to both resource conservation and to food security for local residents:

1. First and foremost, 5AAC 07.365 – The Kuskokwim Salmon Management Plan states: *(a) The purpose of this management plan is to provide guidelines for management of the Kuskokwim salmon fisheries that result in the sustained yield of salmon stocks large enough to meet escapement goals, amounts reasonably necessary for subsistence uses, and for nonsubsistence fisheries.* Unfortunately, these objectives have not been attained in recent years.
2. In 2013 all seven of the Kuskokwim's salmon enumeration projects observed the lowest king salmon escapements on record, resulting in a failure to meet the drainagewide escapement goal (Figure 1). A new drainagewide escapement goal of 65,000 to 120,000 king salmon was adopted in 2013. For the second time in the past four years, escapements on the Kuskokwim fell below this mark.
3. The Alaska Department of Fish and Game's (department) preseason forecast for 2013 was for between 160,000-240,000 king salmon, however, the department's preliminary run reconstruction estimate for the entire river was only 94,000 king salmon. Of these, roughly 46,000 were harvested by subsistence fishermen, allowing only about 47,000 to

escape to the spawning grounds. Subsequently, the 2013 escapement was the lowest on record, dipping below the 2010 estimate of 49,000.

4. The 2012 preseason forecast was also imprecise and in November and December of 2013, the department reassessed the accuracy of the many preseason modeling tools. The department concluded that management for the upcoming year (i.e., 2014) could be better informed based on the outcome from the prior year. Consequently, the 2014 preseason forecast range is projected to be in the ballpark of 70,000-117,000 (i.e.,  $\pm$  25% of 94,000).
5. The annual king salmon subsistence harvest for the entire Kuskokwim drainage often exceeds 80,000. Considering that the upper bound of the 2014 forecast is 117,000 - that would leave a harvestable surplus of 52,000 above escapement needs. This is well below the average harvest of king salmon among Kuskokwim River communities and would be burdensome to many residents in regards to food security.
6. Significant restrictions during 2012 resulted in a subsistence harvest of only 22,000 kings; the restrictions included 288 hours of total closure during the mid-part of the season and 216 hours where only 6" mesh or less nets were allowed toward the end of the season. This reduction did result in an escapement consistent with the newly established 2013 drainagewide goal. In 2013 a mesh size restriction of 6" or less was implemented during the later part of the season that contributed to a harvest estimated at 46,000 - twice as many as in 2012; but unlike 2012, the escapement goal was not achieved. Unfortunately, there was a substantial disparity among fishers' success in 2013. The lower river residents, although still below their average harvest levels, did manage to put away a considerable amount of kings (many of the lower river fishers fish with 50-fathom nets); the middle and upriver residents, however, were unable to meet their needs (these fishers tend to fish with 25-fathom nets).

All indications point to a need for restrictions in 2014, even more restrictive than what were imposed in 2012; that year residents experienced the most severe limits ever enacted on the Kuskokwim River. Figure 2 shows one possible schedule proposed by the department allowing very limited opportunity in June and July. Regardless of what restriction are in place, and given the likely limited surplus expected, it's unlikely that subsistence fishers will be allowed one opening per week as spelled out in the Management Plan (5 AAC 07.365).

If the king salmon run in the Kuskokwim River continues to decline, it is possible and downright frightening, that no harvestable surplus would be available from the get go. As noted, restrictions are almost a certainty. No one wants to repeat last year's scenario of the disparity among fishers' ability to harvest king salmon and the non-attainment of escapement.

By enacting this regulation, a significant reduction in per-drift fishing efficiency would occur for a large number of fishers who currently use 50-fathom nets. The use of the larger nets along with the sizeable number of households reliant on subsistence fishing is a contributing factor to why the subsistence fishery has "enormous fishing power" as described by Travis Elison, the department's Area manager; hence, the consideration of the tentative two 4-hour periods shown in Figure 2.

Reducing the subsistence fleet's fishing power would derive two benefits. It would not only improve the chances of king salmon escaping the fishery and reaching the spawning grounds, it could allow for additional openings which would give fishers more time to harvest other salmon species to fill the void of the weak king abundance.

Limiting the customary methods of fishing that most Kuskokwim residents employ for extended time periods would certainly hinder fishers' ability and opportunity to fulfill their subsistence fisheries needs. Depending on the king salmon conservation measures executed, it is likely that they would interfere with the ability of fishers to harvest other abundant salmon species like chum or sockeye salmon. Based on a conversation with Sergeant Ken Actin with the Wildlife Troopers in Bethel, there are ways to reduce net length without cutting nets that would make it acceptable for enforcement yet not excessively burden fishermen.

Figure 1. Kuskokwim Weir Project King Counts 2003 - 2013

Year	Chinook Salmon Escapement						Takotna Salmon
	Kwethluk	Tuluksak	George	Kogrukuk	Tatlawiksuk	Takotna	
2003	14,474	1,064	4,693	11,771	1,683	378	<sup>a</sup>
2004	28,605	1,475	5,207	19,651	2,833	461	<sup>a</sup>
2005	<sup>a</sup>	2,653	3,845	22,000	2,918	499	<sup>a</sup>
2006	17,619	1,043	4,357	19,414	1,700	539	<sup>a</sup>
2007	13,267	374	4,883	13,029	2,061	418	6,220
2008	5,312	701	2,698	9,730	1,071	413	2,376
2009	5,710	362	3,663	9,702	1,071	311	<sup>a</sup>
2010	1,693	201	1,500	5,690	567	178	<sup>a</sup>
2011	4,079	288	1,571	6,891	1,012	134	<sup>a</sup>
2012	<sup>a</sup>	560	2,302	<sup>a</sup>	1,116	228	<sup>a</sup>
2013 <sup>b</sup>	<sup>a</sup>	193	1,158	1,713	495	94	598
SEG	4,100-7,500		1,800-3,300	4,800-8,800			
Average							
2003-2012	11,345	872	3,472	13,098	1,603	356	4,298

<sup>a</sup> Weir did not operate or counts were incomplete.

<sup>b</sup> Preliminary numbers subject to change.

Figure 2. ADF&G Preliminary Subsistence Fishing Schedule

January 8, 2014

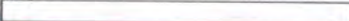

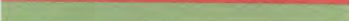
**Preliminary 2014 Subsistence Fishing Schedule**

	June																				
Rolling Closure/Open Section	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat
Section 1: Lower Section of 1-B																					
Section 2: Lower Section 1-B to Tuluksak																					
Section 3: Tuluksak to Chuathbaluk																					
Section 4: Chuathbaluk to Holitna River mouth																					
Section 5: Holitna River mouth to Headwaters																					

	June										July											
Rolling Closure/Open Section	22	23	24	25	26	27	28	29	30	1	2	3	4	5	6	7	8	9	10	11	12	
	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat	
Section 1: Lower Section of 1-B																						
Section 2: Lower Section 1-B to Tuluksak																						
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Section 4: Chuathbaluk to Holitna River mouth																						
Section 5: Holitna River mouth to Headwaters																						

	July																					August	
Rolling Closure/Open Section	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	1	2		
	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat	Sun	Mon	Tues	Wed	Thu	Fri	Sat		
Section 1: Lower Section of 1-B																							
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Section 5: Holitna River mouth to Headwaters																							

**Key**

	No restrictions
	Closed to salmon fishing
	Gillnets restricted 6-inch or less mesh size and livebox is required on fishwheels