

RC12

Alaska Board of Fisheries Work Session October 9-10, 2013

Comments on ACR #3 AND ACR #4

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Do you consent to your contact information being included on printed copies of your comment?

Yes No

YDFDA supports ACR 3 and ACR 4.

ACR 4:

Please note that the proposer, YDFDA, has two separate purposes in submitting ACR 4. The first, primary and foremost purpose is to allow purse seine gear as legal commercial gear for targeting summer chum salmon in times of king salmon conservation.

The second purpose, which is secondary, is to allow the web of purse seine gear to be constructed from multi-strand monofilament.

We respectfully suggest that the Alaska Board of Fisheries consider these two purposes separately. We did not intend to tie these purposes together as an all or nothing type scenario.

RC 2: STAFF COMMENTS

ACR3 and ACR 4

In RC 2, Staff Comments, please note that in both ACR 3 and ACR 4 the proposer is not listed as YDFDA. YDFDA is the proposer for both ACRs.

STAFF ASSESSMENT OF THE AGENDA CHANGE REQUEST:

- a) Is there a fishery conservation purpose or reason?

YDFDA recognizes that there are two purposes of ACR 3 and 4, staff only recognizes one. We agree with staff comments that a purpose of both ACRs is to increase the commercial harvest of summer chum salmon. However, although the ACR specifically addresses the conservation concern of allowing too many of the commercially harvestable surplus of summer chum salmon to spawn, causing a conservation concern from overescapement, the staff comments does not mention this concern as a possibility. Just because ADF&G has not completed the analysis of the Yukon River summer chum salmon escapement goal, along with the replacement point assessment, does not mean that a conservation concern does not exist. YDFDA has presented evidence (Sandone 2013) that allowing more than 2.0M summer chum salmon to spawn reduces the productivity of the stock and will most likely result in below average runs in the future. Note that escapements during the past three years have been over 2.0M salmon, with the 2013 escapement exceeded 2.6M salmon.

ADDITIONAL INFORMATION:

In both ACR 3 and ACR4, staff states that

In 2013, despite the marked improvement in commercial summer chum salmon harvest in Yukon Area districts 1 and 2, there was a foregone commercial harvest of approximately one million fish.

We want to point out that the foregone harvest of approximately one million fish was for District 1 and 2 alone. The drainage-wide foregone harvest was over 1.6M summer chum salmon.

Although there was a marked improvement in commercial summer chum salmon harvest in Yukon Area districts 1 and 2, the commercial exploitation rate was dismal. Note that the commercial exploitation rate for District 1 and 2 was 12% while the targeted commercial exploitation rate was over 41%. Likewise, while the actual drainage-wide commercial exploitation rate was 15%, the target commercial exploitation rate was 65%. Approximately 1.6M of the 3.2M run, or 50% of the total run, was foregone harvest.

Sandone, G.J. 2013. Yukon River summer chum salmon escapement goal analysis. A report to Yukon Delta Fisheries Development Association by G.Sandone Consulting, LLC.

2013 YUKON AREA SUMMER CHUM SALMON SYNOPSIS		
	Numbers	Proportion
Est. Total Summer Chum Run	3,200,886	1.000
Targeted Drainage Escapement	1,000,000	0.312
Est. Subsistence Harvest	115,000	0.036
Targeted Commercial Harvest	2,085,886	0.652
Est. Drainage-wide Escapement	2,600,307	0.812
District 1 and 2 Com. Allocation	1,324,538	0.414
Actual District 1, and 2 Harvest	379,143	0.118
Value of the District 1 & 2 Fishery	\$1,721,524	
District 1 and 2 Foregone Com Harvest	945,395	0.295
Foregone revenue to Dist 1 & 2 Fishers	\$4,292,626	
Other District Com. Harvests	106,436	0.033
Total Area Foregone Com Harvest	1,600,307	0.500