

RC 5



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



IN REPLY REFER TO:

FWS/OSM 13001.SF

JAN 08 2013

Mr. Karl Johnstone, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811

Subject: U.S. Fish and Wildlife Service Response to Revisions of Kuskokwim River Chinook Salmon Escapement Goals.

Dear Mr. Johnstone:

The purpose of this letter is to provide the U.S. Fish and Wildlife Service's (FWS) position on proposed escapement goals for Chinook salmon in the Kuskokwim River. This is a follow-up to a letter sent to you on October 5, 2012, indicating our inability to support the proposed SEGs until further analyses of the data were completed by ADF&G and FWS. After receiving requested data from ADF&G, our staff was able to become more familiar with the data and models used to analyze these data, and followed up with a meeting with ADF&G staff on December 12, 2012. As a result of this, we have been able to reach agreement on most issues, although some concerns still remain.

Overall, FWS finds ADFG's technical development of both the run reconstruction and Bayesian space-state models to be of high quality, and agrees that data generated from the run reconstruction model strongly fit a density-dependent Ricker-type spawner-recruitment relationship. However, FWS remains concerned that annual total run estimates obtained from the run reconstruction model are likely too low. This is attributable to two factors: subsistence harvests, which comprise a large proportion of each year's total run, are likely under-reported and mark recapture estimates which are used to scale run reconstruction total run estimates, are likely biased too low. Thus, while we agree with ADF&G's decision to take a more precautionary approach to setting escapement goals, we would have been more comfortable in delaying escapement goal revisions until the issues of under-reporting and mark recapture bias could have been more fully explored and addressed. It will be particularly interesting to observe Chinook runs over the next few years since these are from a relatively low escapement that, according to the Ricker model used to set the SEG, would be expected to produce large returns.

TAKE PRIDE
IN AMERICA 

Mr. Karl Johnstone

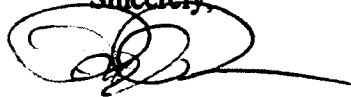
2

Management of the Tuluksak River Chinook salmon run still remains a central FWS concern since ADF&G proposes eliminating the SEG for this system as part of escapement goal revisions. Although mining operations have damaged fishery habitat, this system should still be capable of supporting more spawning Chinook salmon than have been returning. While the Federal fishery manager has the authority to make targeted time and area closures that may be needed to protect this run, determining when to take such actions, as well as justifying such actions, becomes more problematic without an escapement goal.

In closing, we cannot overstate the need for ADF&G and FWS to continue to productively work together and with stakeholders in evaluating, setting, and delivering escapements that will sustain this valuable resource. Currently, FWS and ADF&G are working together to reduce the risk of not delivering desired escapements by exploring options for establishing inseason management objectives that account for assessment error and bias.

Thank you for the opportunity to comment.

Sincerely,



Pete Probasco
Assistant Regional Director, OSM

cc: Cora Campbell, Commissioner, ADF&G
Jeff Regnart, ADF&G
Jennifer Yuhas, ADF&G
Geoff Haskett, Regional Director, FWS
Laverne Smith, Deputy Regional Director, FWS
Mitch Ellis, Assistant Regional Director, Alaska Refuges, FWS
Gene Peltola, Refuge Manager, Yukon Delta NWR, FWS
Tim Towarak, Chair, Federal Subsistence Board