



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

Comments on Yukon River proposal 131:
"Require pulse protection in the King salmon management plan"
Submitted by, Jill Klein YRDFA Executive Director
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My name is Jill Klein and I am the executive director of the Yukon River Drainage Fisheries Association, also known as YRDFA. We all know the king salmon run on the Yukon River has been steadily declining. There have been subsistence restrictions, little to no commercial fishing, missed border passage goals with Canada; all resulting in impacts to community and social well being in Yukon River villages.

More than a year ago, YRDFA, with funding from the State of Alaska, launched a project to work with stakeholder groups across the drainage to address how to handle the management of declined king salmon stocks. A committee was formed and included representatives from the lower, middle, and upper Yukon, including the Yukon River Panel, the three river-wide tribal non-profits, the three Federal Subsistence Regional Advisory Councils, YRDFA co-chairs, and fish processors.

The committee identified two top priorities which were to formalize pulse protection and to manage the fishery equitably across districts.

The YRDFA river-wide delegation at their 22nd annual meeting last year in Galena passed a resolution supporting pulse closures in regulation to help rebuild the Chinook salmon stock. The YRDFA executive board of ten river-wide members, more recently did not take action on this proposal. They instead continued to discuss the concept of pulse protection, with 8 supportive and 2 opposing. The executive board did not have consensus on the details of implementation of pulse protection but they want to stress that pulse protection take place on all pulses of king salmon throughout the run to maintain genetic diversity of Yukon River salmon stocks.

We see firsthand at YRDFA the complexity of working river-wide to address challenging fishery issues.

Formalizing pulse protection and adding it to the management plan is not meant to be an added restriction on subsistence users. It is instead a tool that has been used, many would say successfully to manage the king salmon during years of low runs.

Not everyone is in support of this proposal. We understand the need to harvest other species of salmon in the river at the same time as king salmon; we understand the fear people have about creating new regulations that limit fishing activity, even though it is

only in times of low abundance, and when subsistence restrictions are projected to take place; and we understand the need for flexibility in management.

The concepts of equity and pulse protection received so much support across the drainage that we want to keep it in the management tool box, even if just through management authority in-season. It is a recognized tool of preference. In this RC you will find suggested language for inclusion into the king salmon management plan.

Thank you.

King Salmon Pulse Protection Proposal

(underlined text represents additions to the current language)

5 AAC 05.360 (a) The objective of this plan is to provide the department with guidelines to manage for the sustained yield of Yukon River king salmon. The goal of this plan is to ensure that adequate escapements, both in numbers and quality, are maintained on the spawning grounds to facilitate rebuilding of the run to historical levels. The department will manage for quality of escapement that provides for full representation of the genetic and phenotypic characteristics of the stock and shall use the best available data, including preseason run projections, test fishing indices, age and sex composition, subsistence and commercial harvest reports, and passage estimates from escapement monitoring projects to assess the run size for the purpose of implementing this plan.

5 AAC 05.360 (XX). Pulse protection.

- (1) The Yukon River king salmon run usually enters the river in three distinctive pulses of fish. Management of the first pulse of the king salmon run will be based on preseason projections. Management of the second and third pulses will be based on in-season run assessment data.
- (2) The department will manage the first pulse of the king salmon run based on preseason run projections to not allow any harvest from the first pulse when the preseason projection of run size indicates that subsistence harvests will likely be restricted in one or more districts or sub-districts.
- (3) Based on the in-season run assessment, the department will restrict harvest opportunities on the second and third pulses of Yukon River king salmon, as necessary, to provide for escapements and international treaty obligations;
- (4) The department shall distribute reductions in subsistence harvest opportunities equitably among users.