



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

January 15, 2013

Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Re: Comments on 2012-2013 AYK Board of Fisheries Proposals

Dear Mr. Johnstone and Board of Fisheries Members:

The Yukon River Drainage Fisheries Association (YRDFA) appreciates the opportunity to comment on the 2012-2013 Alaska Board of Fisheries proposals for the AYK region. YRDFA is an association of commercial and subsistence fishermen and women on the Yukon River in Alaska with a mission of protecting and promoting healthy, wild fisheries and cultures within the Yukon River drainage. The salmon of the Yukon River provide a primary source of healthy food for the people and tribes of the region and are essential to the subsistence way of life on the Yukon River. For many residents the commercial salmon harvest also provides the only means of income for those who live in the remote villages along the Yukon River.

YRDFA's Board of Directors is composed of sixteen board members and fourteen alternates representing every fishing district within the Yukon River watershed. YRDFA is the only river-wide group of fishermen that work together on fisheries issues impacting the entire Yukon River. Our board operates on a consensus basis and when we have 80% of our board members present that support or oppose a proposal we will report the specific vote.

The YRDFA Executive Board met on January 14, 2013 to take action on the Board of Fisheries proposals. The attached comments reflect the Executive Board's positions at this time. Many of these proposals are seeking opportunity to fish for subsistence and commercial harvests when stocks are healthy and many other proposals are seeking conservation measures for depressed salmon stocks. We know firsthand the challenge of trying to balance the complexity of the Yukon River fishery. We ask the Board of Fisheries to consider the many multifaceted aspects of the issues at hand and to work with all fishers on the Yukon River to address these proposals.

Sincerely,

Jill Klein
Executive Director

**YRDFA BOARD POSITIONS:
Arctic-Yukon-Kuskowim Finfish Proposals
Alaska Board of Fisheries 2013**

PROPOSAL 130: Review amounts necessary for subsistence salmon in Yukon-Northern Area

YRDFA Board Position: Support option c

Justification: While there is new data to utilize, the low king salmon runs over the past ten years have affected not only the king salmon harvests but also the chum salmon harvests. The lack of king salmon fishing has driven down all harvests and new decisions should not be based on data points from a collapsing fishery. We understand the reason for reviewing ANS and that the use of ANS is as a report card. Things are changing right now on the Yukon River and need for chum salmon may increase. Harvests are in fluctuation due to changing salmon returns and future harvests may be changing in response to this. In light of the recent declining king salmon runs and the impact this has had on the entire Yukon River fishery we feel it best to leave the ranges as is based on historical data and no change on the ANS range should happen at this time.

PROPOSAL 131: Require pulse protection in the king salmon management plan

YRDFA Board Position: No action

8 support and 2 oppose (no consensus) the concept of pulse protection as a tool for managers. We want to emphasize that all pulses of king salmon entering the Yukon River are protected (and conversely equally harvested when abundant) are protected throughout a summer fishing season.

Justification:

The YRDFA Executive Board did not take action on proposal 131 due to the complexity of the need to balance harvests with conservation and the need to allow flexibility in the management of the king salmon run, yet continue the progressive steps that have been taken in 2009, 2011 and 2012 to move king salmon to the spawning grounds.

The YRDFA full delegation supported pulse protection in regulation at their 22nd annual meeting in Galena but at this time most board members supported the concept of pulse protection. In specific, the concept of protecting all pulses of king salmon is needed to protect the genetic integrity of the salmon stocks in the Yukon River. YRDFA thinks this is a good step towards conservation but understands the interests of others such as in the lower river where fishermen want to harvest summer chum salmon for subsistence and commercial pursuits and others who are hesitant to put this into regulation.

PROPOSAL 132: Prohibit commercial sale of king salmon from the Yukon River drainage unless there is a directed king salmon commercial fishery.

YR DFA Board Position: No consensus.

Justification: The YR DFA board as well as the river is divided on this issue. Lower river fishermen would like the ability to sell incidentally caught king salmon in the commercially directed chum salmon fisheries when possible to offset the costs of subsistence fishing and living in Western Alaska. The upper river fishermen believe that every king salmon counts and needs to move up to the spawning grounds. They also believe in equitable river wide harvests and fear that incidentally caught king salmon sold for cash are salmon that they could catch in their subsistence harvest. Additionally upper river people believe that if the king salmon can be sold, lower river people may directly target them, even with gear restrictions in place. We understand and support economic opportunity when possible but we are also working to conserve declined salmon stocks.

PROPOSALS 133 & 134: Directed commercial chum salmon fishery in Yukon districts 1, 2, and 3 during times of king salmon conservation using 5&1/2 inch or smaller mesh and Require 6-inch or smaller mesh maximum depth of 30 meshes, June to July in District-1 if king salmon are a stock of concern.

YR DFA Board Position: Do not support

Justification: The maximum mesh size on the Yukon River was just changed 2 years ago. While we understand the desire to allow for increase fishing opportunity for chum salmon, not all fishermen have the gear sizes required by these proposals at this time and could be an added cost to fishermen. Even with smaller mesh gear there may be significant amounts of king salmon in the river at the time of the summer chum commercial fisheries and while we appreciate the good faith efforts of the lower river to share their incidental harvests of king salmon with upper river fishing families, upper river fishermen would rather leave these king salmon in the river. We support efforts like the Kaltag fish wheel fishery where it is proven that the impact to king salmon is minimal to none. We would like to support commercial fisheries when possible so that there is not forgone harvest of abundant species but at this time we are trying to conserve king salmon. We feel that management can work with the specific fishing districts through their in-season authority to allow for opportunity when possible.

PROPOSAL 135: Allow commercial chum salmon fishery with 6-inch or smaller mesh in Yukon River beginning July 1 during times of conservation of king salmon.

YR DFA Board Position: Do not support

Justification: In 2012, a portion of kings were still coming into the river on July 1. A mandated start for the commercial summer chum salmon fishery of July 1 could therefore incidentally catch a significant number of kings. We would like to support commercial fisheries when possible so that there is not forgone harvest of abundant species but at this time we are trying to conserve king salmon. We feel that management can work with the specific fishing districts through their in-season authority to allow for opportunity when possible.

PROPOSAL 136: Cap bycatch of king salmon in the summer chum fishery in districts 1 and 2 at 2,000 fish.

YRDLA Board Position: **Do not support**

Justification: While we did not have consensus on proposal 132 to prohibit sales entirely, a cap would be difficult to manage for with current management data. When there is sufficient abundance of Chinook salmon, sale of incidentally caught kings could be allowed without a cap.

PROPOSAL 137: Develop an optimum escapement or in-river goal for the Yukon River summer chum salmon stock that originates above Pilot Station.

YRDLA Board Position: **Do not support**

Justification: YRDLA has historically worked on management plans with river wide input. We believe a public process should be initiated to establish drainage wide escapements that will impact management triggers. We want to support more opportunity for fishing for both subsistence and commercial while balancing the need for sustaining the stocks over time.

PROPOSAL 138: Lower the fall chum salmon management plan trigger point from 500,000 to 400,000.

YRDLA Board Position: **Do not support**

Justification: YRDLA does not feel that changes to management plans should be suggested by individual proponents. Historically YRDLA has worked by consensus with management agencies to develop trigger points for fisheries management plans. Any future changes to management plans should continue to follow this process and have greater public input. Again we support opportunity for added subsistence and commercial fisheries to take place, but want to follow the public process we have historically used. YRDLA would be happy to continue to work on management plans.

PROPOSAL 139: Align Yukon subsistence regulations in districts 1-3 with current management practices.

YR DFA Board Position: No consensus

Justification: YR DFA executive board positions on this proposal are divided between regions of the Yukon River. In the upper Yukon River they are used to concurrent periods and there are less people fishing so they are in support of this. In the lower river, there has been a history of some subsistence users illegally selling subsistence king salmon in the commercial fishery when there were concurrent periods in the past. There are more people fishing in districts 1-3 thus raising concerns about people fishing subsistence and commercial at the same time.

PROPOSAL 140: Revert back to a windows-only fishing schedule in the Yukon River.

YR DFA Board Position: No consensus (2 support, 8 oppose)

Justification: Most of the board supports allowing management to relax the regulatory windows schedule when adequate numbers of fish are indicated in season. Some supported continuing the windows schedule regardless of abundance to provide for stronger conservation based management.

PROPOSAL 141: Allow for concurrent subsistence and commercial fishing periods in districts 1-3 of the Yukon River area.

YR DFA Board Position: Do not support

Justification: For reasons similar to 139, the board did not support this proposal with unanimous consent as even the upper river users who support the concept of allowing concurrent commercial and subsistence openings do not support making this mandatory. We support the ability of management to use their authority in-season to schedule concurrent periods when feasible.

PROPOSAL 142: Open Yukon River District 5-D from July 4-18 for subsistence fishing.

YR DFA Board Position: Do not support

Justification: We understand the hard position that the people in the Yukon Flats are in by being the last district in US waters before the Canadian border. They are at the end of the line and they harvest predominantly Canadian bound fish. When the Yukon River is being managed conservatively this leads to more closures in Y-5D. Additionally, it takes more fishing effort to harvest fish in this region as compared to the lower fishing districts. Despite these concerns, the need to conserve salmon by protecting pulses of salmon that are of Canadian origin is a priority.

PROPOSAL 143: Remove restrictions during the subsistence fall chum season in districts 1, 2, and 3 of the Yukon Area.

YR DFA Board Position: Do not support

Justification: While we understand the desire to reduce fishing restrictions, it does not seem prudent to remove restrictions in regulation regardless of abundance during times of conservation. Management can use their authority in-season to lift restrictions when abundance is indicated.

PROPOSAL 144: Restrict gillnets to 35 meshes in depth in the Yukon River drainage.

YR DFA Board Position: Do not support

Justification: The maximum mesh size was just changed two years ago. Another gear change, such as reducing the maximum depth of gillnets as proposed, is not warranted at this time.

PROPOSAL 145: Restrict depth of subsistence and commercial nets in districts Y1-5 to 35 meshes

YR DFA Board Position: No consensus (1 support, 9 oppose)

Justification: The YR DFA executive board of directors does not feel that another gear change is warranted at this time. One board member does feel that more conservative gear changes are needed to protect king salmon in the Yukon River.

PROPOSAL 146: Allow only 6-inch stretched mesh gillnet gear in the Yukon River drainage.

YR DFA Board Position: No consensus (1 support, 9 oppose)

Justification: The YR DFA executive board of directors does not feel that another gear change is warranted at this time. One board member does feel that more conservative gear changes are needed to protect king salmon in the Yukon River.

PROPOSAL 147: Allow drift gillnets as legal gear in the subsistence fishery in District 4-A of the Yukon River, upriver to the community of Ruby.

YR DFA Board Position: No action.

Justification: Members of the executive board felt that the proposal was not written correctly, and therefore took no action.

PROPOSAL 148: Extend subdistricts 4-B and 4-C drift gillnet area downstream from the mouth of the Yuki River for king salmon.

YR DFA Board Position: Support

Justification: This is a fishery that attracts people from another area and causes friction with the people who live in the area. This proposal would create a new area for people to fish. We support increasing the space for fishing opportunity here in order to alleviate crowding. We don't feel this will lead to increased fishing effort but spread out the crowd.

PROPOSAL 149: Create a harvest reporting system for subsistence-taken salmon in the Yukon River.

YR DFA Board Position: No consensus (2 support, 8 oppose)

Justification: Most opposed the proposal because it would be a burden on Elders and other users. Some supported the proposal to provide better harvest reporting data, more timely data and more accurate information to be used in management decision-making.

PROPOSAL 150: Create a harvest reporting system for subsistence taken salmon in the Yukon River.

YR DFA Board Position: No action

Justification: The Yukon River stakeholder group did not develop this placeholder proposal because they learned that a mandatory permit system would be required and members were not in support of this.

PROPOSAL 151: Require primary use of subsistence-caught salmon within the Yukon Area be for direct personal or family consumption as food.

YR DFA Board Position: No consensus (2 support, 8 oppose)

Justification: While YR DFA did pass a resolution to support the primary use of subsistence caught salmon to be for human consumption at their Galena 2012 annual meeting, we do not support this concept going into regulation. We believe the wording of this particular proposal targets customary trade and will dictate personal decisions related to how people share their fish. This would limit bartering and sharing with Elders. There are already provisions in place to prohibit the use of king salmon for dogs, so this is not a necessary regulation. It would place a burden on subsistence users.

PROPOSAL 152: Open Acharon Channel in the Yukon River drainage to salmon fishing.

YR DFA Board Position: No action

Justification: We will defer to people in this region for suggested action on this proposal.

PROPOSAL 154: Close the Black River and its tributaries to sport fishing for king salmon.

YRDFA Board Position: Support

Justification: This fishery that is still allowed is in a spawning area and we don't support fishing in spawning areas especially where there is a depleted stock. We would like to protect the stocks as much as we can, and closing the spawning area to fishing seems prudent.

PROPOSAL 240: Establish times when a commercial gillnet permit holder in the Lower Yukon Area districts 1–3 may use dip net and beach seine gear to commercially harvest chum salmon during the summer season, including specifications and operations provisions for dip net and beach seine gear.

YRDFA Board Position: Do not support

Justification: There are many potential risks to using new gear in the king salmon fishery with the current state of declining king salmon runs in the Yukon River. New gear types may not be used properly and there is concern that fish could be harmed leading to increased rates of mortality. It is therefore not prudent to adopt these new gear types at this time in regulation. We support the ability of management to use their management authority in-season to allow for new opportunities for commercial fishing in the lower river.

PROPOSAL 241: Provide department emergency order authority to restrict gear to fish wheels only, require fish wheels to be closely attended, and live-release of king salmon in District 6 during times necessary to conserve king salmon

YRDFA Board Position: No consensus (2 support, 8 oppose)

Justification: The YRDFA board was in support of this type of proposal in Y-4 but many have concerns with applying this in the Tanana River. There are many more king salmon that will be going through the fish wheels in Y-6 with potential for harming the king salmon. Additionally, the Tanana River stocks are vulnerable to fishing pressure and this could cause undue stress on the king salmon. The way the fish wheels are designed in the Tanana River could lead to challenges that are different than in the Kaltag-designed fish wheels. Some supported the proposal, understanding the need for people to harvest fish, as long as the fish were handled properly and felt this would increase opportunity for income in the area and is proven to work elsewhere such as in Y-4.