

Kuskokwim River Salmon Management Working Group

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Information Packet

May 31, 2012

This letter was discussed at the May 30, 2012, KRSMWG meeting. It is being distributed at the request of USFWS staff and the KRSMWG members.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Yukon Delta National Wildlife Refuge
807 State Highway
P.O. Box 346
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May 25, 2012

Travis Ellison, Acting
Area Management Biologist
Alaska Dept. of Fish & Game
Commercial Fisheries Division
PO Box 1467
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Travis:

I appreciate the opportunity to review the Alaska Department of Fish and Game's (Department) new in-season management strategy for the Kuskokwim River basin. Please regard our comments as preliminary since the new model is un-tested and refuge staff had a short time frame to respond to a complex process. For the refuge to embrace the new strategy it must assure that stocks of concern and subsistence priority in the conservation unit are protected for refuge purposes (Title VIII of ANILCA). In the future substantial changes in management strategy (i.e. actions that may affect future escapement goals) should be cooperatively done well in advance of the field season and in the spirit of the Memorandum of Understanding (MOU) between the Department and the federal agencies (dated: 6/17/05). The Department's first proposed management strategy was sent to our office on May 15, 2012 only a few weeks from the start of the Chinook salmon run.

After review of the revised proposal from the Department submitted to our office on May 17, 2012, Yukon Delta National Wildlife Refuge (Refuge), the Office of Subsistence Management (OSM), and the Refuges Office in Anchorage (RO) all concur to the Departments' revised approach, if the following two recommendations are included:

1) The FWS proposed Krogruluk River (KOG) escapement objective of 9,389 and the corresponding 132,947 basin escapement are utilized as the basis for in-season modeling and subsequent decisions by in-season managers.

Although there is not a statistically significant difference between revised numbers presented by the Department (8,234 and 119,854) and the proposed numbers by the refuge, using the proposed target of 9,389 the model more closely predicts non-achievement of tributary escapement objectives for 2011. Model fit improves in the context of run prediction for the lower tributaries when the higher threshold is incorporated. Consequently, the refuge is compelled to use a management approach to have the best chance at meeting refuge purposes for a



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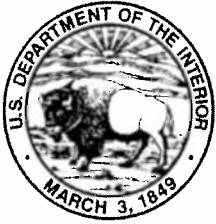
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resource of conservation concern. The refuge's deference through ANILCA is first to conservation concerns, then to subsistence and then to sport harvest. In 2012, if the Chinook salmon run is poor and if the escapement fails again on the Kwethluk and Tuluksak rivers, this will be the 5th and 6th years respectively that escapement has not been met. The escapement goals for these rivers were cooperatively agreed upon by the Department, federal agencies, and accepted by the Board of Fish. These are the existing rules that drive our management strategy and our cooperative decisions. Considering the possibility of another poor Chinook salmon run, appropriate and prudent management for the species is in order.

2) Concurrent to the application of the new model, use last years' management tool(s) as a check and balance for in-season management decisions. The refuge understands the transition to a new management strategy would include more data inputs and accommodate more run variables which may result in better predictive qualities on run strength. However, the 2011 management tool did accurately predict run strength for lower river tributaries. If there were any failures in last years' in-season management, it was timing issues for implementation, duration and frequency of closures to accommodate stock utilization. In the refuge's opinion, the 2011 model performed adequately with the understanding that its performance was best when run timing was average. Considering this is the second year of using predictive tools for in-season management, the new model may not perform under certain conditions as well, so also using last years management tool as a reasonable check and balance seems sensible. In order to ensure the refuge meets our conservation and subsistence mandates as stipulated under ANILCA, the refuge encourages that this step be taken.

The refuge does not support commercial sale of incidentally caught Chinook salmon from the Kuskokwim River while restrictions to subsistence users are in place, either on the mainstem or tributaries within the conservation unit boundaries of the Kuskokwim River basin. The Department has stated that there is no statutory mechanism to preclude such action, although I would ask you to discuss this with your Yukon River counterpart and your predecessor. The strategy the refuge advocates is similar to that being used this season on the Yukon River. This additional step could assure that we assimilate state regulations throughout the regulatory season without federal intervention. To advocate any commercial exploitation at this juncture may be premature.

In early winter this year the Assistant Regional Director of OSM and I meet with the Regional Supervisor for the Alaska Yukon Kuskowim Region. It is at this level and at



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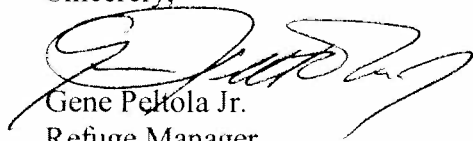
this time we expect any substantial changes to our respective management strategies to be first discussed. One of the goals of the MOU was to develop a process of reviewing and developing escapement goals which should lead to improved cooperation and communication, minimized disruption to fisheries, and minimized duplication of effort. In our opinion, this is a good standard for in season management planning and needs to have advanced cooperation to affect the spirit of the MOU and foster our cooperative relationship.

The refuge also wants to ensure our participation in the development of any proposed basin wide escapement goals for the Kuskokwim basin and related changes to escapement goals that may be submitted to the Board of Fish. The refuge's consistent and purposeful engagement in this process will be imperative for future cooperative in-season management. Therefore, the refuge respectfully requests any information and current progress on tentative changes of escapement goals in the basin so we can professionally respond in a timely manner.

Chinook salmon escapement are part and parcel of ecosystem function for associated terrestrial and aquatic ecosystems, and a long-term loss of biomass from decaying salmon represents a loss of historic function and integrity of these systems. The refuge is mandated to "conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, shorebirds, seabirds, whistling (tundra) swans, emperor, white-fronted and Canada (cackling) geese, black brant and other migratory birds, **salmon**, muskox, and marine mammals". Therefore, appropriate management on the mainstem of the Kuskokwim River may be necessary to protect lower tributary river Chinook salmon stocks as a measure to ensure ecosystem function and protect biological diversity as a matter of federal law and policy. Commercial interests are not a mandated priority for the refuge, subsistence is. It is the refuge's hope that the Department joins us in managing up rather than down to protect Chinook salmon stocks that are emblematic of the refuge.

The refuge would like to thank the Department's research staff for their efforts and cooperation to enhance lower river tributary escapement. The extra work between our staff's is commendable and appreciated.

Sincerely,



Gene Peltola Jr.
Refuge Manager
Yukon Delta National Refuge