

September 3, 2009
At Emmonak
Lower Yukon River, Alaska

PETITION FOR EMERGENCY FINDING BY THE BOARD OF FISHERIES

Submitted by Yukon Delta Fisheries Development Association
Representing the Villages Of: Alakanuk
Emmonak
Kotlik
Mountain Village
Nunam Iqua
Grayling

Yukon Delta Fisheries Development Association hereby requests the Board of Fisheries to consider and find an emergency condition exists in the Yukon Fall Salmon Fishery. We are petitioning the Board to take into account the situation and dilemma how current regulations have positioned the fishery and prevents the Department of Fish and Game from allowing a commercial harvest of surplus coho salmon in the Lower Yukon River fishery.

The current regulation that is preventing a commercial harvest from occurring on a harvestable surplus is the Yukon River Drainage Fall Fish Management Plan as adopted by the Board of Fisheries. That plan restricts any commercial fishing from taking place if the fall chum salmon returns are below 525,000 fish.

At the same time the coho run is tracking to be a record run with over 190,000 fish reported to have passed the Pilot Station Sonar as of September 1st. As reported by ADF&G on August 31, **Yukon River Fall Salmon Fishery News Release #18**: "On an average year, over three quarters of the fall chum salmon and over one half of the coho salmon are in the river by August 31." ADF&G data would further demonstrate that at the very least, a minimum of another 130,000 coho salmon would enter the river. This would provide for a total coho run of 320,000 fish. The largest coho run on record for the Yukon River is 270,000 fish in 2003.

We clearly understand the intent of the Fall Fish Management. We fully acknowledge and support the State of Alaska's mandate that all State regulated fisheries are to be managed above all else for sustainability. The Yukon River Drainage Fall Chum Management Plan specifies a minimum escapement goal of 300,000 fish to maintain a sustainable fishery. Again, according to that news release from the Department, the goal will be achieved.

Due to the extremely low ratio of chums to coho moving into the river, allowing a directed coho fishery would have little if any impacts on the fall chum run. The ratio of chum to coho based on

ADF&G sonar data clearly demonstrates this. During the last week of August (25th thru 31st) 35,861 coho passed the sonar at Pilot Station compared to 2,953 chum salmon. That is a 12 to 1 ratio, and the chum composition is only 7.5% of the run during this time. (Enclosed with petition is ADF&G Pilot Station Sonar Report)

We are requesting emergency action based on the following issues.

The likelihood of over escapement pertaining to the coho run: This issue has most recently come to our attention due to the fact that ADF&G has stated that the most likely cause of the low return of this year's fall chum is over escapement during the parent brood year of 2005. That year, the fall chum salmon spawning escapement was estimated at 1,996,700 fish. The previous 10 year average was 503,000 fish. Due to the inability to harvest the surplus in 2005, the fall chum run in 2009 is well below average. The coho run now in progress is tracking at a pace that will very likely put over 300,000 fish on the spawning grounds. This amount of fish is nearly double the managed average of 150,000 fish. Due to the uncertainty of what could occur due to over escapement, we feel preventing harvests of this sizable surplus will most likely cause future coho run failures. Prevention of future runs failures should be a priority of the Department, whenever possible.

Exclusion of a biological allowable resource harvest: The regulations now in effect are preventing the harvest of surplus coho salmon. Not allowing the residents of the Lower Yukon to fish is severely restricting their ability and capabilities to provide for themselves financially. It further prevents them from being able to carry out much needed subsistence activities. The economy on the Lower Yukon is a one resource only economy – salmon fishing. There currently is extra ordinary economic distress in the region. The primary cause of the economic distress is the inability of the Department to allow commercial fishing on surplus stocks due to the complexities of managing a drainage that is larger than the State of Texas. This occurred during this past season's summer chum fishery, as the Department was very reluctant to permit a directed chum fishery due to concerns over the king run. Similar situations have occurred during the past three seasons. In order to exemplify the level of economic hardship this has placed on the families here, please take into consideration that the ex-vessel value of the Yukon River fishery is now only 5% of what it averaged during the late 80's and 90's. Fishermen averaged less than \$1,700 in gross earnings this season. Permitting even a limited directed coho fishery would present a great deal of relief to the residents of the Lower Yukon. It would undoubtedly provide the much needed cash so that fuel, hunting ammunition, and supplies could be purchased in order to carry out and provide for subsistence food in order to get through the winter. Gasoline and bullets cannot be purchased with food stamps.

Denying a group people the ability to earn money when there is a biological allowable resource available was clearly not the intent of the Yukon River Drainage Fall Fish Management Plan.

Other Considerations:

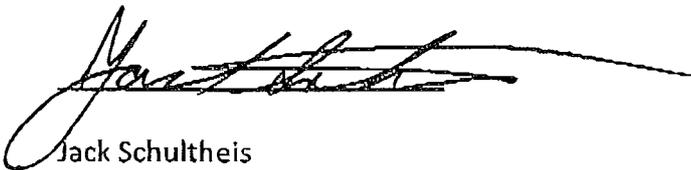
Living on the Lower Yukon for hundreds of generations we fully understand the importance of the fall salmon run providing subsistence fish to communities up river from our villages. Our subsidiary, Kwipak Fisheries LLC based in Emmonak has agreed to provide all necessary processing and freight costs to deliver any and all incidentally caught fall chum salmon to any villages in the Yukon drainage that have been impacted by the fall salmon run and are in need of subsistence fish. Kwipak Fisheries facilitated several shipments of incidentally caught king salmon that were donated by fishermen to upriver villages during the summer chum fishery. Donated fish were processed and delivered in good condition by our subsidiary all the way up river to Eagle.

Again we respectfully request emergency consideration by the Board of Fisheries concerning this extremely urgent issue.

Respectfully submitted by:



Ragnar Alstrom
Executive Director
Yukon Delta Fisheries Development Association



Jack Schultheis
General Manager
Kwipak Fisheries

Yukon Area project updates of daily and cumulative coho salmon test fishery CPUEs, escapements, and fish wheel catches, 2009.

****Preliminary project information, subject to change.****

**For more detailed information on individual projects and qualifiers of the daily information please contact 907-408-7283.

Date	O'Chone Dm Test Fishery		B'and MM Dm Test Fishery		Mo Village Dm Test Fishery		Pilo Station Dm Test Fishery		Tsnjals-Aw Viljan Test Fishery		Nenane Tag Viljan Test Fishery		Date
	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily Passago	Cumulative Passago	Adjusted (24hrs) Daily Catch	Adjusted (24hrs) Cumulative Catch	Adjusted (24hrs) Daily Catch	Adjusted (24hrs) Cumulative Catch	
16-Jul	0.00	0.00	0.00	0.00									16-Jul
17-Jul	0.00	0.00	0.00	0.00	4.32	4.32							17-Jul
18-Jul	0.00	0.00	0.00	0.00	0.00	4.32							18-Jul
19-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					19-Jul
20-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					20-Jul
21-Jul	-	0.00	0.00	0.00	0.00	4.32	0	0					21-Jul
22-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					22-Jul
23-Jul	-	0.00	0.00	0.00	0.00	4.32	0	0					23-Jul
24-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					24-Jul
25-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					25-Jul
26-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					26-Jul
27-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	0					27-Jul
28-Jul	-	0.00	0.00	0.00	0.00	4.32	160	160					28-Jul
29-Jul	0.00	0.00	0.00	0.00	0.00	4.32	0	160					29-Jul
30-Jul	0.00	0.00	4.17	4.17	0.00	4.32	40	210					30-Jul
31-Jul	0.00	0.00	0.00	4.17	0.00	4.32	0	210					31-Jul
1-Aug	0.00	0.00	0.00	4.17	4.10	8.42	48	258					1-Aug
2-Aug	0.00	0.00	1.40	5.58	0.00	8.42	1,241	1,500					2-Aug
3-Aug	0.00	0.00	0.00	5.58	0.00	8.42	599	2,104					3-Aug
4-Aug	0.00	0.00	0.70	6.28	8.89	17.31	0	2,104					4-Aug
5-Aug	0.00	0.00	7.49	13.77	12.00	30.17	1,394	3,498					5-Aug
6-Aug	0.00	0.00	2.91	16.68	8.85	38.82	751	4,249					6-Aug
7-Aug	0.00	0.00	0.71	17.37	37.00	76.00	872	5,061					7-Aug
8-Aug	0.00	0.00	15.04	33.02	37.00	114.18	1,239	6,300					8-Aug
9-Aug	0.00	0.00	28.07	61.08	16.89	133.07	2,360	8,660					9-Aug
10-Aug	0.40	0.40	41.33	103.32	25.95	159.02	1,858	10,530					10-Aug
11-Aug	0.00	0.40	9.51	112.83	45.72	204.74	10,760	21,290					11-Aug
12-Aug			4.54	117.37	10.70	223.00	10,820	31,920					12-Aug
13-Aug			3.00	121.03	122.92	346.42	13,377	45,244					13-Aug
14-Aug			3.02	124.04	25.70	372.18	5,088	51,230					14-Aug
15-Aug			2.21	126.26	22.35	394.53	7,085	58,088					15-Aug
16-Aug			8.18	132.44	34.03	428.36	3,482	62,877					16-Aug
17-Aug			11.95	144.36	21.17	450.53	2,215	64,582					17-Aug
18-Aug			3.73	148.12	21.05	471.58	8,857	71,240					18-Aug
19-Aug			28.94	177.08	21.82	493.10	9,399	80,640					19-Aug
20-Aug			37.01	214.07	55.82	548.92	10,227	90,870					20-Aug
21-Aug			12.73	226.80	58.28	608.20	20,378	111,793					21-Aug
22-Aug			13.87	240.67	30.00	648.25	17,301	128,814					22-Aug
23-Aug			3.75	244.42	87.18	712.03	12,730	141,344					23-Aug
24-Aug			1.50	245.92	21.88	733.89	10,572	151,916					24-Aug
25-Aug			0.73	252.66	38.40	772.30	4,508	156,485					25-Aug
26-Aug			5.08	257.72	4.44	777.74	3,954	160,439					26-Aug
27-Aug			5.07	262.79	4.44	781.23	3,070	163,500					27-Aug
28-Aug				265.04	15.24	796.47	7,510	171,010					28-Aug
29-Aug					8.21	804.68	2,862	174,001					29-Aug
30-Aug					42.09	846.77	8,742	180,750					30-Aug
31-Aug					23.41	870.18	7,027	187,777					31-Aug
1-Sep													1-Sep
2-Sep													2-Sep
3-Sep													3-Sep
4-Sep													4-Sep
5-Sep													5-Sep
6-Sep													6-Sep
7-Sep													7-Sep
8-Sep													8-Sep
9-Sep													9-Sep
10-Sep													10-Sep
11-Sep													11-Sep
12-Sep													12-Sep
13-Sep													13-Sep
14-Sep													14-Sep
15-Sep													15-Sep

a. This project will evaluate the feasibility of run timing and relative abundance fall chin and coho salmon offshore of Seaman Bay.

****Preliminary project information, subject to change.****

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Yukon Area project updates of daily and cumulative fat chemical test factory CPUEs, setpoints, and fish steel catches, 2008.

Preliminary project information, subject to change.

**For more detailed information on individual projects and quality of the daily data please contact ADFAG at 807-469-7293.

Date	Ukrova (21m)		E-4 and M-1		V-10		P-10		E-10		H-10									
	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE	Daily CPUE	Cumulative CPUE
18-Jul	7.77	7.77	4.50	4.50	10.75	10.75														
17-Jul	0.00	7.77	4.64	8.04	97.27	4.64														
16-Jul	2.53	10.29	2.04	12.00	4.16	49.17														
15-Jul	1.63	11.92	1.50	13.68	8.21	50.38														
14-Jul	2.58	14.50	0.00	13.68	8.21	50.38														
13-Jul	-	14.50	0.77	14.37	8.21	50.38														
12-Jul	1.58	16.08	0.10	14.37	16.63	61.22														
11-Jul	-	16.08	2.98	17.27	17.19	64.77														
10-Jul	0.00	16.08	0.00	17.27	44.00	107.20														
09-Jul	0.00	16.08	1.60	19.12	8.21	145.43														
08-Jul	2.97	18.45	0.75	19.87	0.00	145.43														
07-Jul	0.00	18.45	1.54	21.41	0.00	149.43														
06-Jul	-	18.45	0.00	21.41	4.19	149.43														
05-Jul	0.00	18.45	0.75	22.16	12.21	161.64														
04-Jul	0.00	18.45	22.57	44.50	4.10	165.74														
03-Jul	0.00	18.45	18.01	62.50	17.50	183.04														
02-Jul	0.00	18.45	2.23	64.73	64.29	247.89														
01-Jul	0.00	18.45	4.29	69.02	47.48	294.87														
30-Jun	0.00	18.45	1.52	70.54	0.00	291.82														
29-Jun	0.10	18.45	1.40	71.94	12.00	303.82														
28-Jun	0.00	18.45	8.00	79.94	22.12	325.94														
27-Jun	0.00	18.45	2.92	82.86	12.37	338.31														
26-Jun	0.00	18.45	14.97	97.84	12.31	351.32														
25-Jun	0.00	18.45	24.62	120.45	12.31	363.63														
24-Jun	0.00	18.45	44.41	164.87	210.23	617.88														
23-Jun	0.00	18.45	14.09	179.86	279.02	891.89														
22-Jun	0.00	18.45	2.91	182.78	188.05	1,079.93														
21-Jun	0.00	18.45	4.80	187.58	0.55	1,080.48														
20-Jun	1.52	166.10	27.11	1,114.69	17.184	1,097.66														
19-Jun	1.40	169.54	4.71	1,119.39	1.578	1,101.90														
18-Jun	2.64	172.82	4.44	1,123.74	2,303	1,123.74														
17-Jun	2.81	175.63	12.87	1,136.61	132	1,136.61														
16-Jun	3.75	200.20	4.21	1,140.82	473	1,140.82														
15-Jun	0.70	200.90	21.09	1,160.97	2,333	1,160.97														
14-Jun	47.74	248.74	12.83	1,173.80	5,028	1,173.80														
13-Jun	16.92	265.66	1.04	1,174.84	4,033	1,174.84														
12-Jun	4.62	270.28	117.87	1,186.08	10,839	1,186.08														
11-Jun	19.71	278.38	20.00	1,206.08	7,319	1,206.08														
10-Jun	4.54	283.12	8.89	1,214.97	2,718	1,214.97														
09-Jun	4.30	287.42	4.44	1,219.41	2,540	1,219.41														
08-Jun	0.75	288.17	21.17	1,240.58	787	1,240.58														
07-Jun	11.83	300.00	22.07	1,262.65	597	1,262.65														
06-Jun	0.00	307.07	0.00	1,262.65	200	1,262.65														
05-Jun	3.04	311.01	4.32	1,266.97	201	1,266.97														
04-Jun	0.00	311.01	0.00	1,266.97	807	1,266.97														
03-Jun	15.61	311.25	58	1,315.20	188	1,315.20														
02-Jun	0.00	311.25	89	1,315.20	161	1,315.20														
01-Jun	-	-	-	-	-	-														
31-May	-	-	-	-	-	-														
30-May	-	-	-	-	-	-														
29-May	-	-	-	-	-	-														
28-May	-	-	-	-	-	-														
27-May	-	-	-	-	-	-														
26-May	-	-	-	-	-	-														
25-May	-	-	-	-	-	-														
24-May	-	-	-	-	-	-														
23-May	-	-	-	-	-	-														
22-May	-	-	-	-	-	-														
21-May	-	-	-	-	-	-														
20-May	-	-	-	-	-	-														
19-May	-	-	-	-	-	-														
18-May	-	-	-	-	-	-														
17-May	-	-	-	-	-	-														
16-May	-	-	-	-	-	-														
15-May	-	-	-	-	-	-														
14-May	-	-	-	-	-	-														
13-May	-	-	-	-	-	-														
12-May	-	-	-	-	-	-														
11-May	-	-	-	-	-	-														
10-May	-	-	-	-	-	-														
09-May	-	-	-	-	-	-														
08-May	-	-	-	-	-	-														
07-May	-	-	-	-	-	-														
06-May	-	-	-	-	-	-														
05-May	-	-	-	-	-	-														
04-May	-	-	-	-	-	-														
03-May	-	-	-	-	-	-														
02-May	-	-	-	-	-	-														
01-May	-	-	-	-	-	-														

* The project will evaluate the feasibility of run timing and relative abundance fall chum and coho salmon offshore of Rasmussen Bay.

Preliminary project information, subject to change.

Preliminary project information, subject to change.

Pilot Station
Fall Chum Data