Comments on Yukon River proposal 131:
"Require pulse protection in the King salmon management plan"
Submitted by, Jill Klein YR DFA Executive Director
January 16, 2013

My name is Jill Klein and I am the executive director of the Yukon River Drainage
Fisheries Association, also known as YR DFA. 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, YR DFA, 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, YR DFA 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 YR DFA 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 YR DFA 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 YR DFA 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.