

Eastern Interior Alaska Subsistence Regional Advisory Council
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MAR 05 2018

John Jensen, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
1255 W 8th Street
Juneau, Alaska 99811-5526

Re: Comments on Alaska Board of Fisheries 2017/2018 Proposals 230, 231, 232, 233, and 237

Dear Chairman Jensen:

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to submit its positions and comments on Alaska Board of Fisheries (BOF) 2017/2018 proposals 230, 231, 232, 233, and 237. The Council deliberated these proposals during its winter 2018 public meeting held on February 28 – March 1, 2018, and developed the following comments to address issues of concern to Federally qualified subsistence users in the Eastern Interior Alaska Region.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Eastern Interior Alaska Region. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charter established the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council **unanimously opposes** Proposal 230: 5 AAC 01.220.230. Lawful gear and specifications.

Allow the use of drift gillnets to harvest salmon for subsistence purposes in Yukon River Subdistricts 4-B and 4-C.

Council comments: The Council stressed that Chinook Salmon populations in the Yukon River drainage have been below historical levels, and more opportunity to harvest Chinook Salmon should not be provided in permanent regulations, since there is still a continuing need for conservation of this salmon species. Additionally, drift gillnets are efficient and can harvest larger, more fecund Chinook Salmon that are needed to increase reproduction and future run sizes. The Council noted that large gillnet mesh sizes contributed to the historically low Chinook Salmon run sizes in recent years in the Yukon River drainage.

The Council **unanimously opposes** **Proposal 231:5 AAC 05.360. Yukon River King Salmon Management Plan.**

Repeal the prohibition on subsistence fishing in Yukon River Districts 1 and 2 during the first pulse of King salmon.

Council comments: The Council feels that the continuing conservation and rebuilding of the Yukon River Chinook Salmon run are still needed. In the Council's opinion, strong Chinook Salmon returns of the last two of years are not indicative of complete restoration of the Chinook Salmon run. The first pulse of Chinook Salmon, which is predominately Canadian bound, contains a significant number of large females, and the Council states that removing these fish from the population will be detrimental to Chinook Salmon conservation. Currently, the Alaska Department of Fish and Game has the ability to keep the first pulse closed using its emergency order authority, even if Proposal 231 passes. However, if the prohibition on fishing in Yukon River Districts 1 and 2 during the first pulse of Chinook Salmon is repealed, the Council opined that there will be more pressure on fisheries managers to open fishing on the first pulse in Districts 1 and 2. The Council feels that this proposal is premature and suggests revisiting it in the next 5 to 10 years.

The Council **unanimously opposes** **Proposal 232: 5 AAC 05.360. Yukon River King Salmon Management Plan.**

Allow sale of Yukon River King Salmon caught incidentally during open commercial fishing periods for other salmon species.

Council comments: The Council opined that if Proposal 232 passes, it may increase the harvest of Chinook Salmon later in the season. The Council noted that commercial fishermen may specifically target Chinook Salmon in the Chum Salmon fishery due to their higher commercial value. The Council emphasized that the Chinook Salmon run has not been completely rebuilt, management needs to remain in conservation mode, and it is premature to allow commercial sales at this time.

The Council **unanimously supports** **Proposal 233: 5 ACC 05.200. Fishing districts and subdistricts; 5 ACC 05.330. Gear; and 5 AAC 05.350. Closed waters.**

Clarify the District 1 boundary and allow set gillnets to be operated up to three nautical miles seaward from any grassland bank in District 1 after July 15.

Council comments: The Council recognized the regulation would be both a clarification and allocative. The intent of the regulation is to continue to allow the set gillnet commercial salmon fishery to be prosecuted in a portion of District 1 without competition from the drift gillnet commercial salmon fishery. The Council supports continuation and protection of this long-established set gillnet fishery.

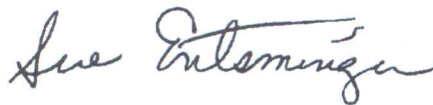
The Council **unanimously supports** **Proposal 237: 5 AAC 05.310. Fishing Seasons.**

Repeal the District 6 commercial fishing season fixed closure date and replace with a closure date established by emergency order.

Council comments: The Council reported that the Fall Chum Salmon run on the Tanana River can still be running as late as Christmas, and in the Delta Clear Water River it can be running as late as February. The market for salmon after October 1 includes many dog mushers living in the area who prefer these later run salmon so that they can "crib" them for later use as dog food. Cooler temperatures after October 1 allow salmon to be preserved and stored with less preparation. Since strong Chum Salmon returns were recorded in the last several years, allowing more fishing openers later in the year will present fishermen with opportunities to earn additional income while providing quality products to buyers.

For your convenience, the Council plans to submit a copy of this letter in-person at the Alaska BOF Meeting scheduled to be held on March 6-9, 2018 in Anchorage, Alaska. Additionally, a copy of this letter has been submitted to the Federal Subsistence Board. The Council shares this letter with the BOF and the Federal Subsistence Board, emphasizing these issues are of great importance to the subsistence needs of the people of Eastern Interior Region. Any questions regarding this letter can be addressed directly to me through our Subsistence Council Coordinator, Katerina "Katya" Wessels, at (907) 786-3885, katerina_wessels@fws.gov.

Sincerely,



Susan L. Entsminger
Chair

cc: Federal Subsistence Board

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Katerina Wessels, Subsistence Council Coordinator, Office of Subsistence Management

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Alaska Department of Fish and Game

Eastern Interior Alaska Subsistence Regional Advisory Council

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