

Western Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
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RAC/WI 18014.ZS

MAR 05 2018

John Jensen, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
Boards Support Section
1255 West 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 Western Interior Alaska Subsistence Regional Advisory Council (Council) to submit comments on Alaska Board of Fisheries (BOF) 2017/2018 Proposals. The Council discussed BOF 2017/2018 proposals 230, 231, 232, 233, and 237 during its winter 2018 public meeting held on February 20-21, and developed the following comments to address issues of concern to Federally qualified subsistence users in Western Interior Alaska. The Council requests the BOF provide a written response, summarizing efforts to address the concerns stated in this letter, to be circulated and read at the Council's fall 2018 meeting, scheduled for October 10-11 in Galena.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western 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 establish 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 their regions 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.

Proposal 230

The Council **supports Proposal 230**. The Council supports authorizing the use of drift gillnets

in the waters near Galena. The Council notes the proposal covers stretches of non-Federal public waters to allow gillnet fishing. The Council also notes that the proposal provides equity of methods for all residents of the river. The Council expressed support for the BOF liberalizing regulations so that drift gillnets will be allowed in Districts 4-B and 4-C. The Council noted that the implementation of this proposal would result in negligible increase in harvest and, therefore, does not present a conservation concern. Finally, the Council noted that adoption of this proposal helps align State and Federal Regulations.

Proposal 231

The Council **opposes Proposal 231**, stating that the proposal is premature given the incomplete recovery of Chinook Salmon (*Oncorhynchus tshawytscha*) on the Yukon River and because other districts would still be on conservation status. The Council emphasizes the need for continued pulse protection. The Council noted pulse protection was instrumental from the first season and every subsequent season to Chinook Salmon recovery and resulted in improved age-sex-length (ASL) characteristics on the spawning grounds. Additionally, the Council noted its support for the original Yukon River Drainage Fisheries Association (YRDFA) proposal that specifically provides for the transboundary conservation of the fishery and spawning grounds. The Council emphasized that pulse protection has been an effective and critically important fisheries management strategy for rebuilding Chinook Salmon runs and should not be overlooked out of the normal meeting cycle. Removing pulse protection could create a negative population trend.

Proposal 232

The Council **opposes Proposal 232** to allow the sale of Yukon River Chinook Salmon caught incidentally during open commercial fishing periods for other salmon species. The Council noted that the proposal only applies to the gillnet commercial fishery. The Council stated that some fishers will target Chinook Salmon using Chum Salmon (*Oncorhynchus keta*) gear and sell them, noting that this is especially problematic before July 15. The Council noted that the proposal is too broad. The Council also noted that the proposal would incentivize the sale of Chinook Salmon. The Council expressed concern that this could increase incidental harvest in gillnets two or three fold, to 10,000 or 15,000 Chinook Salmon. The Council noted it is too easy for fishers to change fishing area or strategy to target Chinook Salmon. The Council added that Chinook Salmon runs have not fully recovered. Specifically, the Council noted that the U.S. subsistence harvest is still below the historical average. The total Yukon River Chinook Salmon run accounts for only half of the historical average. Similarly, the Council noted that Canadian subsistence harvest is at 60% of historical average. The Council emphasized that conservative salmon harvest is biologically, economically, and culturally necessary at this time (Moncrieff, C.F. 2017).¹ The Council noted this proposal may have more merit in the future.

¹ Moncrieff, C.F. 2017. How People of the Yukon River Value Salmon: A case study in the lower, middle, and upper portions of the Yukon River. Final report to the North Pacific Research Board project #1413. Yukon River Drainage Fisheries Association. Anchorage, Alaska.

Proposal 233

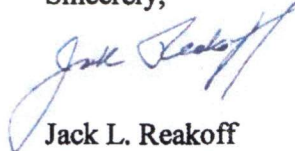
The Council **supports Proposal 233**, stating it appears not to create a conservation concern.

Proposal 237

The Council **supports Proposal 237**, stating it appears not to create a conservation concern.

For your convenience, the Council plans to submit a copy of this letter in-person at the Alaska BOF Meeting on Statewide Dungeness Crab, Shrimp, and Miscellaneous Shellfish 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 vital importance to the subsistence needs of the people of Western Interior Alaska. Thank you for consideration of our request. Any questions regarding this letter can be addressed directly to me or through our Subsistence Council Coordinator, Zach Stevenson, at (907) 786-3674, zachary_stevenson@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jack Reakoff", is written over the typed name.

Jack L. Reakoff
Chair

cc: Federal Subsistence Board

Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management

Thomas C.J. Doolittle, Deputy Assistant Regional Director

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Jennifer Hardin, Ph.D., Subsistence Policy Coordinator, Office of Subsistence Management

George Pappas, State Subsistence Liaison, Office of Subsistence Management

Carl Johnson, Council Coordinator Supervisor, Office of Subsistence Management

Zachary C. Stevenson, Subsistence Council Coordinator, Office of Subsistence Management

Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game

Glenn Haight, Executive Director, Alaska Department of Fish and Game

Nissa Pilcher, Regional Coordinator, Interior Region, Board Support Section

Alaska Department of Fish and Game

Western Interior Alaska Subsistence Regional Advisory Council

Interagency Staff Committee

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