



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Fish and Game

DIVISION OF COMMERCIAL FISHERIES
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To: Mr. John Jensen, Chair
Alaska Board of Fisheries

Date: July 11, 2018

Through: Scott Kelley, Director
Division of Commercial Fisheries

From: John Linderman, Regional Supervisor
Region III
Division of Commercial Fisheries

Subject: Emergency petition from the Tribal Chiefs of the Native Villages of Grayling, Anvik, Shageluk, and Holy Cross to allow subsistence fishing for fall chum salmon with drift gillnet gear after August 2 in Yukon Area Subdistrict 4A downstream from the mouth of Stink Creek.

The Tribal Chiefs submitted a petition to the Alaska Board of Fisheries (board) on July 3, 2018. The board scheduled this petition to be heard on July 17, 2018.

This letter provides information from the Alaska Department of Fish and Game (department) concerning matters raised in the petition and assessment of petition policy criteria.

Action Requested

This petition requests the board amend regulations for the portion of Yukon Area Subdistrict 4A downstream from the mouth of Stink Creek to allow subsistence fishing for fall chum salmon with drift gillnet gear after August 2.

Background

Though drift gillnets have not been legal gear in the upper Yukon Area since 1976, they have historically been an important gear type for subsistence salmon fishing. Fishermen living in the communities of Grayling and Anvik report travelling downriver to District 3 to subsistence fish for salmon with drift gillnet gear. Though they can harvest salmon with drift gillnet gear much more efficiently than with set gillnet gear, traveling long distances to do so can be cost prohibitive for some. Subsistence fishermen from many communities have informed the department about the loss of suitable set gillnet fishing sites due to bank erosion causing changes to the efficacy or loss of the eddies where fish congregate. This is causing increased competition in Subdistrict 4-A for viable set gillnet sites.

There are very few locations to operate set gillnet gear in this region of the river, which makes it difficult for fishermen to capitalize on the harvestable surplus of fall chum salmon. Regulation changes at previous board meetings allowed the department to provide subsistence fishing opportunity with drift gillnets, by emergency order, so that fishermen could more effectively harvest abundant summer chum salmon, especially to supplement low king salmon harvests. This board decision was based on limited stationary gear fishing locations in this area of the river, and that drift gillnets would allow subsistence fishermen more opportunity to capitalize on the surplus of summer chum salmon. Allowing drift gillnets in this section of the river after August 2 would be expected to have a similar effect on subsistence opportunity for fall chum salmon.

There is a positive customary and traditional use finding for king, summer chum, fall chum, coho, and pink salmon in the Yukon Area. The board has found that 45,500–66,704 king salmon, 83,500–142,192 summer chum salmon, 89,500–167,900 fall chum salmon, 20,500–51,980 coho salmon, and 2,100–9,700 pink salmon are reasonably necessary for subsistence uses.

Finding of Emergency

Under criteria listed in the Subsistence Proposal Policy used to consider petitions directed at subsistence hunting or fishing, paragraph (a) of 5 AAC 96.615 reads, in pertinent part:

- ...1) the proposal must address a fish or game population that has not previously been considered by the board for identification as a population customarily and traditionally used for subsistence under AS 16.05.258; or
- 2) the circumstances of the proposal otherwise must require expedited consideration by the board, such as where the proposal is the result of a court decision or is the subject of federal administrative action that might impact state game management authority.

The circumstances of this petition may require expedited consideration by the board. A delay may result in the fall chum salmon resource not being available for harvest in the current season. Fall chum salmon typically enter the Yukon River in mid-July and arrive to this region early to mid-August. The next Arctic–Yukon–Kuskokwim board meeting is scheduled for January 2019. Any regulatory changes at that meeting would not go into effect until the 2019 season and such a delay would be burdensome to the petitioners

Summary

The 2018 Yukon River king salmon run is unexpectedly coming in much lower than preseason forecasts and the department has had to considerably reduce subsistence salmon fishing opportunity and limit gear to smaller mesh-size gillnets to ensure sufficient numbers of king salmon escape to spawning grounds. These fishing restrictions are causing a substantial and unexpected burden on Yukon River subsistence fishermen. Fishermen will need to supplement their reduced king salmon harvests with other species of salmon to meet subsistence needs. The 2018 fall chum salmon run is expected to provide for escapement and a biologically allowable harvestable surplus. Fall chum salmon are a preferred salmon species for human consumption in this region because summer chum salmon quality and condition are poor when they reach this subdistrict.

The request by the Tribal Chiefs is for the board to amend regulations for the lower portion of Subdistrict 4A on the Yukon River to allow for subsistence fishing for salmon with drift gillnet after August 2. With low king salmon returns on the Yukon River in the past 5 years, subsistence fishermen have been supplementing severely reduced king salmon harvests with other species of salmon that are more abundant and provide a harvestable surplus. The requested regulation change would allow fishermen to harvest a biologically allowable surplus of fall chum salmon moving through the district.

cc: Glenn Haight, Executive Director, Alaska Board of Fisheries
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