

June 29, 2018

The Tribal Chiefs of the Native Villages of Grayling, Anvik, Shageluk, and Holy Cross request that the Alaska Board of Fisheries consider an emergency petition **to amend regulations for the lower portion of Subdistrict 4A on the Yukon River to allow for drift gillnet subsistence fishing after August 2**. With low king salmon returns on the Yukon River in the past 5 years, fishermen have been supplementing severely reduced subsistence king salmon harvests with other species of salmon that are more abundant and have a harvestable surplus. The requested regulation change would allow fishermen to harvest a biologically allowable surplus of fall chum salmon moving through the district.

Currently, there are very limited stationary gear (i.e. set net) locations in this region of the river, which make it difficult for fishermen to capitalize on the harvestable surplus of fall chum salmon. Regulation changes at previous Board meetings allowed the department to open up subsistence salmon fishing with **drift** gillnets for **summer** chum salmon, 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 fishermen to capitalize on the surplus of summer chum salmon better than set gillnets. Limiting salmon fishing to stationary gear alone has resulted, in the past, in fishermen in this area not having reasonable opportunity to meet their subsistence salmon needs.

The 2018 king salmon run is unexpectedly coming in much lower than pre-season forecasts and the Alaska Department of Fish and Game has had to considerably reduce subsistence salmon fishing opportunity and limit gear to smaller mesh gillnets to ensure enough sufficient numbers of king salmon escape to spawning grounds. These fishing restrictions are causing significant and unexpected burden on Yukon River subsistence fishermen and fishermen will need to supplement their reduced king salmon harvests with other species of salmon. The 2018 summer chum salmon run is slightly lower than average, but is still large enough to meet escapement goals and provide for a full subsistence harvest and a harvestable surplus for the commercial fishery. There is a linear, positive relationship between the summer chum salmon run sizes and the subsequent fall chum salmon run sizes on the Yukon River. As such, 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 significantly more deteriorated.

This emergency petition meets the criteria outlined in the Joint Board Petition Policy, 5 AAC 96.625(f), as it is an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future. Fall chum salmon typically enter the Yukon River in mid-July and arrive to this region early to mid-August. Delayed regulatory action would be burdensome to the petitioners, as they would not be able to harvest a biologically allowable surplus of fall chum salmon and meet their salmon subsistence needs with stationary gear alone to supplement their low king salmon harvests.

Please see the attached signed resolution from the Tribal Chiefs in support of this emergency petition.

June 29, 2018

Proposed regulation change by this emergency petition:

5AAC 01.220(e) is amended to read:

- (1) in Subdistrict 4-A upstream from the mouth of Stink Creek,
 - (A) king salmon may be taken by drift gillnets from June 10 through July 14, unless closed by emergency order;
 - (B) from June 10 through August 2, the commissioner may open, by emergency order, fishing periods during which chum salmon may be taken by drift gillnets;
 - (C) chum salmon may be taken by drift gillnets after August 2;
- (2) in Subdistrict 4-A downstream from the mouth of Stink Creek,
 - (A) king salmon may be taken by drift gillnets from June 10 through July 14, unless closed by emergency order;
 - (B) from June 10 through August 2, the commissioner may open, by emergency order, fishing periods during which chum salmon may be taken by drift gillnets;
 - (C) chum salmon may be taken by drift gillnets after August 2;**