

PROPOSAL 243

5 AAC 01.595. Subsistence bag, possession, and size limits.

Allow the harvest of other salmon in place of king salmon in the Tyonek Subdistrict subsistence fishery, as follows:

Amend Tyonek Subdistrict annual possession limits as follows:

(a) The total annual possession limit for each subsistence salmon fishing permit is as follows:

(1) there is no annual possession limit for holders of Port Graham, Koyuktolik, Port Chatham, and Windy Bay Subdistrict and Seldovia Bay subsistence salmon fishing permits, except that in Seldovia Bay a person holding a subsistence salmon fishing permit may not take more than 20 king salmon per household;

(2) 25 salmon for the head of a household and 10 salmon for each dependent of the permit holder;

(3) **The holder of a Tyonek Subdistrict subsistence salmon fishing permit may take 95 salmon and 10 salmon for each dependent of the permit holder, with a maximum of 70 king salmon.**

[IN ADDITION TO THE LIMITS IN (2) OF THIS SUBSECTION, THE HOLDER OF A TYONEK SUBDISTRICT SUBSISTENCE SALMON FISHING PERMIT MAY TAKE 70 KING SALMON; NO MORE THAN 4,200 KING SALMON MAY BE TAKEN IN THE TYONEK SUBDISTRICT FROM MAY 15 THROUGH JUNE 30.]

What is the issue you would like the board to address and why? Allow the harvest of ‘other salmon’ (non king salmon) in place of allowed king salmon harvest for the Tyonek Subdistrict subsistence fishery.

Restrictive measures and low king returns have made it difficult for Tyonek Subdistrict subsistence permit holders to harvest their allowed quota of salmon. Multiple King salmon stocks in Upper Cook Inlet, including seven stocks of concern, have failed to meet escapement goals in recent years. For 2019, EO 2S-01-19 further restricts subsistence permit holders’ ability to harvest by changing the number of fishing days per week from 3 to 2.

This regulation change would allow subsistence users to fill their household quota with other species of salmon, instead of kings. Current regulations are clear that 70 kings are allowed and 25 ‘other salmon.’ With the current situation of Upper Cook Inlet salmon, protecting a chinook by allocating a sockeye, coho etc. is a good move. This would preserve the subsistence lifestyle, and remove some pressure on the sensitive king salmon stocks of concern.

This change would adhere to the Upper Cook Inlet Management Plan, with the statutory priority for subsistence. It would not provide for an increase the number of king salmon harvested, but would allow subsistence users to maintain their subsistence lifestyle. The board has found that all species of salmon are customarily and traditionally taken in Tyonek, and that 700 – 2,700 king salmon, and 150 – 500 other salmon are reasonably necessary for subsistence uses in the Tyonek subdistrict (5 AAC 01.566).

It is arguable that if this proposal were placed into regulation, that the Tyonek Subdistrict subsistence fishery’s harvest could exceed the 150 – 500 (other salmon) previously found

reasonably necessary by the board. However, there are strong indications that this number needs reexamined. The ‘other salmon reasonably necessary number’ is based upon a presumption that subsistence users are able to harvest sufficient numbers of Chinook salmon. This has not been the case in recent years, and in 2019 will be further impacted by the actions of EO 2S-01-19.

The fishery has consistently fallen within the reasonable necessary harvest numbers for Chinook. Historically, the fishery also consistently fell well within the reasonable harvest numbers for other salmon, until recently when king salmon numbers began to decline, users began to harvest more ‘other salmon.’ There is a preference towards kings, yet in difficult times, subsistence users simply want to fill their smokehouses and freezers with the fish that they can. On page 69 of Technical Paper 439, “Subsistence Harvests and Uses of Salmon in Tyonek, 2015 and 2016,” it was found that, “Coho salmon have recently become an important species of salmon for the residents of Tyonek. Community members who were unable to obtain enough Chinook salmon during the early fishing season rely upon coho salmon to sustain their subsistence salmon needs.”

Subsistence fisheries regulations state that (Sec. 16.05.258): “(b) The appropriate board shall determine whether a portion of a fish stock or game population identified under (a) of this section can be harvested consistent with sustained yield. If a portion of a stock or population can be harvested with sustained yield, the board shall determine the amount of the harvestable portion that is reasonably necessary for subsistence uses and... (A) Shall adopt regulations that provide a reasonable opportunity for subsistence uses of those stocks or populations;” In this case, the fish stock being discussed is UCI salmon, other than king salmon. If the amount found reasonably necessary for subsistence use in the Tyonek subdistrict is 150 – 500 fish, with commercial harvest exceeding 1 million fish and an unknown sport fish harvest, failure to address this issue would be a violation of the BOF’s statutory priority for subsistence.

Upper Cook Inlet Salmon Harvest – (2018)

Season to Date

District Name	Deliveries	Chin.	Sockeye	Coho	Pink	Chum	Total
244 UCI Ctr Total (Drift)	5252	2,658	693,892	110,843	108,478	121,428	1,037,299
245 UCI Ctr Total (Set)	265	117	38,073	20,588	432	2,558	61,768
246 UCI Ctr Total (Kalgin Is.)	283	328	34,270	25,374	6,834	611	67,417
247 UCI Northern Total	587	130	48,310	64,056	10,861	5,085	128,442
Grand Total	6387	3,233	814,545	220,861	126,605	129,682	1,294,926

If nothing is changed, the livelihood of the subsistence fishery is negatively affected, and no means to alleviate pressure on the king salmon stocks of concern would be provided.

PROPOSED BY: Tyonek Fish and Game Advisory Committee (HQ-F19-131)
