

Ahtna Intertribal Resource Commission**Re: Proposal 51**

As we see later run timing, by as much as two weeks in recent years, we agree that **“Variability should be considered a critical metric in management of any biological system in this era of climate change” (RC 061). Adoption of Proposal 51 would serve to adaptively link management objectives to commercial management actions.**

We have continually heard that management should remain flexible to achieve our “outstanding record on the Copper River.” However, our record is not “outstanding,” in fact we are failing in terms of genetic diversity, only a handful of years behind the Yukon River crash. Chinook salmon in the Copper River have failed to reach escapement goals **3 of the last 5 years**. This is grounds for designation at a stock of concern. Upper Copper River subsistence users have not been able to feed families, as sockeye that used to escape the fisheries now are not. **See tables 2 & 3 in AITRC’s on time public comment PC10**, that shows the catch per permit has declined.

Proposal 51 would in fact account for this variability. The current flexible management is not working for Chinook salmon and is disproportionately harvesting the uppermost sockeye stocks. These points are illustrated in **PC658 figure 5, and attachment D (WRST)**. The failures of these stocks which are critical to the genetic portfolio of copper river salmon, and ultimately the longevity of all Copper River salmon as environmental conditions shift, are being masked by the ability to get adequate numbers of **total salmon** into the river. We have the tools now to guide management differently (genetics, radio telemetry, terminal sonars/weirs), why don’t we use all available information to halt this inevitable Copper River salmon crisis before it is too late?

The Ahtna people do not want to prevent anyone from participating in the Copper River fisheries, but ensure that we have fish for many generations to come.