

# **Kuskokwim River Salmon Management Working Group**

1 (800) 315-6338 (MEET) Code: 58756# (KUSKO)

ADF&G Bethel toll free: 1 (855) 933-2433

## **Meeting Summary**

**June 6, 2012**

Called to order at 10:03 am at ADFG in Bethel and adjourned at 12:40 pm. Ten of thirteen members were present and a quorum was established.

### **AGENDA ITEMS:**

- 1.) Continuing Business
- 2.) Old Business
- 3.) New Business

### **WORKING GROUP ACTION ITEMS:**

- 1.) Kevin Schaberg will address information requested by AVCP and KNA in the June 5, 2012, letter to the KRSWMG.
- 2.) ADF&G will make maps of each rolling closure section, as well as an area map.
- 3.) Travis Elison will talk to KYUK and confirm having a call-in radio show at 11:00 am on Monday, June 11.
- 4.) Travis Elison will also ask KYUK about potentially having scheduled fisheries announcements throughout the day, as well as an announcement on the KYUK news program.
- 5.) The KRSWMG and other organizations will begin distributing conservation awareness posters throughout Kuskokwim communities. Posters will be given to Yukon-Kuskokwim Health Corporation and Yukon-Kuskokwim School District offices this year. Members should also brainstorm additional talking points for conservation to discuss at the next meeting.
- 6.) Lamont Albertson will draft a letter regarding House Bill 332.
- 7.) Bev Hoffman will draft a letter of recruitment for the vacant Upriver Elder seat.
- 8.) Bev Hoffman will ask the Kuskokwim River Watershed Council for their cooperation in creating a Calvin Simeon Award.

### **MEETING ACTION ANNOUNCEMENT:**

The next KRSMWG meeting will be Friday, June 8, at 1:00 pm.

### **ADF&G RECOMMENDATIONS:**

- 1.) ADF&G and USFWS jointly recommended an escapement Management Objective of 127,279 Chinook Salmon for the Kuskokwim River drainage, which corresponds to a Kogruklu River weir escapement of 8,889 Chinook. If inseason BTF Catch-Per-Unit-Effort (CPUE) indicates that there are not enough Chinook salmon to achieve this Management Objective, 7-day rolling closures may be initiated river-wide. Likewise, if inseason BTF CPUE indicates enough Chinook salmon to achieve this Management Objective, rolling closures may be lifted.
- 2.) ADF&G asked for a KRSMWG meeting on Friday, June 8, to further discuss rolling closures.

### **WORKING GROUP MOTIONS:**

- 1.) To support the joint USFWS and ADF&G recommendation of using 127,279 Chinook salmon a drainage-wide escapement Management Objective for the Kuskokwim. Motion passed unanimously.
- 2.) To accept to the boundary definitions of the five rolling closure sections, as defined by ADF&G. Motion passed unanimously. *Please see Appendix 1 for official rolling closure boundaries.*
- 3.) To accept 7-day rolling closures and the manner in which rolling closures would be implemented. Motion passed unanimously.

### **PEOPLE TO BE HEARD:**

- 1.) Mike Thalhauser (KNA) asked that the June 5 letter to the KRSMWG from AVCP and KNA be added to the agenda. The letter requested information from ADF&G and gave contexts for the requests. *Please see Appendix 2 to read the letter.*
- 2.) Jeff Sanders stated that he had read the AVCP and KNA letter and he thinks that "it is a milestone in cooperative management to see these two groups working together." He said the he was not advocating restrictions for the fishery, but if restrictions are necessary they need to be carefully managed.
  - Jeff asked the group to consider "If there was an adequate number of fish to harvest, if we are overharvesting, and is the Bethel Test Fish sensitive to harvest?"
  - He was concerned that an exaggerated Chinook harvest on the early portion of the run would be detrimental to upriver stocks.
  - He also stated that "real-time" subsistence monitoring would be important to compliment the BTF tool.

### **CONTINUING BUSINESS:**

#### **LOWER RIVER SUBSISTENCE REPORTS:**

- James Charles (Downriver Elder) reported that his "boys" had gone fishing and caught a couple of small Chinook in three hours and someone else caught one chum.
- Charlie Brown (Commercial Fisher) commented that his "boys" caught one Chinook and one chum. Charlie has not talked to many people, but he heard that other catches were small, as well.
- Mike Williams (Downriver Subsistence) reported that the smelt run had been very good and people had met their needs for this species. They were fishing for whitefish and there was a report of one small Chinook caught with a chum net. In Akiachak there had been reports of small Chinook and plenty of healthy-looking sheefish, and in Napakiak one person caught six Chinook. He said that people were getting their fish camps ready, a usual practice for this time of year. Many communities were having elders talk to young people about the importance of having respect for the subsistence way of living.
- Bev Hoffman (Chair) reported that people in Bethel were currently trying to catch fish to eat.

#### **ONC IN-SEASON SUBSISTENCE REPORT:**

ONC surveyed 29 families from June 1 to June 3. No salmon had yet been caught. Most families were preparing for the season and catching smelts. Two families were fishing with set

nets and caught sheefish. Many surveyed families reported that they had shared last year's catch with other families. *Please see June 6 Information Packet pages 3-5 for ONC's full report.*

**MIDDLE RIVER SUBSISTENCE REPORT:**

Gerald Simeon (Middle River Subsistence) reported that people were getting their fish camps ready, waiting for salmon, and catching sheefish in the meantime.

**KNA INSEASON SUBSISTENCE REPORT:**

KNA will begin inseason subsistence surveys next week.

**UPPER RIVER SUBSISTENCE REPORT:**

No report.

**HEADWATERS SUBSISTENCE REPORT:**

Daniel Esai thanked the Emmonak fishers for donating salmon to the Youth Conference in Nicolai. He said that the river was still low in Nicolai and the salmon usually come when the water is higher.

**DISCUSSION OF RUN ASSESSMENT DATA:**

Kevin Schaberg (ADF&G) reported a cumulative CPUE of two Chinook caught at BTF. At that time, the CPUE was similar to 2005 and 2006.

**WEIRS/SONAR/MARK-RECAPTURE/AERIAL SURVEYS:**

Kevin Schaberg reported that Kuskokwim Escapement weirs were being installed, and that the Kalskag fish wheel was ready for operation.

Steve Miller (USFWS) announced that USFWS was looking for families to participate in an ichthyophonous study.

**PROCESSOR REPORT:**

Neither processor had anything to report.

**SPORT FISH REPORT:**

Lamont Albertson (Sport Fish member) commented that sport fishermen were catching sheefish with rod and reel, but not any salmon yet. John Chythlook (ADF&G) had nothing to report.

**WEATHER FORECAST:** The forecast called for partial sun and scattered showers for the next week.

**RECOMMENDATIONS:**

1.) ADF&G and USFWS jointly recommended an escapement Management Objective of 127,279 Chinook Salmon for the Kuskokwim River drainage, which corresponds to a Kogruklu River weir escapement of 8,889 Chinook. If inseason BTF CPUE indicates that there are not enough Chinook salmon to achieve this Management Objective, 7-day rolling closures may be initiated river-wide. Likewise, if inseason BTF CPUE indicates enough Chinook salmon to achieve this Management Objective, rolling closures and other restrictions may be lifted.

2.) ADF&G asked for a KRSMWG meeting on Friday, June 8, to further discuss rolling closures. Travis Elison (ADF&G) stated that, "Based on what we know so far of Chinook abundance this season, the escapement objective, and the forecast, there is potential to not meet lower end of ANS (Amounts Reasonably Necessary for Subsistence)." A meeting on June 8 would allow for a few more days of BTF CPUE and KRSMWG members could be involved in the process of deciding whether or not to initiate closures on Sunday, June 10.

### **WORKING GROUP MOTIONS:**

**MOTION 1:** To support the joint USFWS and ADF&G escapement Management Objective of 127,279 Chinook for the Kuskokwim River drainage. Motion passed unanimously (10 years, 0 days).

Travis Elison explained how BTF operates:

- BTF has been operating consistently since 1984.
- The BTF crew goes out during both high tides each day.
- Heavy fishing pressure below BTF will show up in the BTF number (because there are less fish in the water). When there was unprecedented fishing in June of 2011, the BTF CPUE dropped.
- Heavy fishing above BTF will not be reflected in the CPUE, so managers will have to make assumptions about the level of harvest
- The BTF CPUE tool can be used to make projections of final escapement in season.
- If BTF projects that overall drainage wide escapement of 127,279 Chinook will not be achieved, the department will take further restrictive action.

### **COMMENTS FOR MOTION 1:**

Fritz Charles reminded the agencies to give plenty of notice before closures to prevent fishermen from being cited.

**MOTION 2:** To accept to the boundary definitions of the five potential rolling closure sections, as defined by ADF&G. Motion passed unanimously (10 years, 0 days).

Discussion and clarification as part of the motion:

- Many of the boundaries lines were the same as familiar commercial fishing boundaries. Travis Elison asked the KRSMWG members to help clarify the landmarks he used to create additional section lines, so that boundaries could be easily understood. Members helped revise the descriptions with local names.
- Members requested maps for each section, which ADF&G will distribute in the next information packet.
- ADF&G will place markers at the boundaries of each section.
- ADF&G will clarify any exemptions (such as non-salmon spawning streams) in news releases.
- Rolling closures only apply to the Kuskokwim River proper, not Kuskokwim Bay.

### **COMMENTS FOR MOTION 2:**

Tim Andrew (AVCP) was concerned that Akiak, Akiachak, Napaskiak, Kwethluk, and Oscarville were going to be combined with Bethel within Rolling Closure Section 2. He pointed out that there was heavy fishing congestion in this part of the river, whereas other areas of the

Kuskokwim were sparsely populated. He commented that the Yukon subsistence fishery is based on "efficiency of the fleet of fishermen," so more populated areas like Y1, Y2, and Y3 have shorter fishing windows than upriver areas. Bev Hoffman acknowledged that many communities have been "lumped with the Bethel fishery." However, she reiterated that the closure sections were created in order to protect fish based on how Chinook move up the river, not on community populations.

**MOTION 3:** To accept 7-day rolling closures and the manner in which rolling closures would be implemented. Motion passed unanimously (10 yeas, 0 nays).

Discussion and clarification as part of the motion:

- Rolling closures would be in addition to existing tributary restrictions.
- ADF&G would give a minimum of 24 hours notice before initiating a rolling closure
- Overlapping closures would allow fish to safely swim between sections.
- Seven days is the minimum amount of time for closures to be effective because Chinook swim 13.5 miles a day. The three and four day closures in 2011 were not long enough to ensure run passage
- Rolling closures were intended for the subsistence fishery, not the commercial fishery.

#### COMMENTS FOR MOTION 3:

Bob Aloysius (YK Delta RAC member) asked how the closures would be enforced. Robert Sundown (USFWS) replied that violators would be cited.

Members discussed the importance of communication:

- Charlie Brown was concerned that people out on the river would miss the announcements and be cited by law enforcement. Members replied that fishermen would at least hear the news of the closures on the radio.
- Beverly Hoffman replied that it was everyone's responsibility to start spreading the word immediately.
- Mike Williams commented that tribal governments need to receive information about the rolling closures so that they can inform their communities.
- Tim Andrew suggested using the radio for recorded fisheries announcements multiple times a day, like on Lower Yukon.
- Mark Leary suggested that text messaging could be effective.
- Dan Gillikin (USFWS) reminded the group that once the first lower river section was closed the news would spread quickly.

Lamont Albertson asked how the Sport Fish Division was going to handle the rolling closures. Travis Elison reminded him that sport fishing would automatically be closed and Sport Fish would issue their own news releases.

Mike Thalhauser asked if the Department had the tools to prioritize closures to benefit certain stocks, specifically lower river tributaries of concern. Travis Elison replied:

- Chinook escapements were of concern throughout the Kuskokwim drainage, so the Department was concerned about all fish.
- Upriver Chinook stocks arrive earlier in the run. Early season subsistence harvest may target these stocks and overharvest could occur before ADF&G knew it had happened. The message, to conserve these early Chinook, needed to go out right away.

- Managers will have more options and a better assessment of run size for lower river stocks. In addition to existing tributary restrictions, ADF&G will discuss other management strategies for these stocks in a few weeks.
- Mesh size restrictions could eventually be one management option. However, 6-inch mesh has proven very effective at catching Chinook when they are the dominant or nearly dominant species in the river. When there is greater abundance of chum and sockeye, 6-inch mesh catches more of these species than Chinook.

Regarding the intent of possible closures, Jeff Sanders wondered if the agencies' concern was biological instead of social (subsistence needs). He said that since most of the subsistence activity takes place below Tuluksak, downriver should be closed and not upriver. Robert Sundown (USFWS) replied that the agencies could not allocate fish in that way.

Tim Andrew asked if an 804 Action could be used.

- ANILCA Title VIII Finding 804: "Whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue such uses, such priority shall be implemented through appropriate limitations based on the application of the following criteria: customary and direct dependence upon the populations as the mainstay of livelihood; local residency; and the availability of alternative resources.
- Pippa Kenner (OSM) replied that the closures would be enacted through the state management system, not federal, so the 804 Action would not apply.

Henry Lupie (Member at Large) commented that people in the lower river were not fishing yet. From his experience, Eek and Tuntutuliak start fishing around June 15<sup>th</sup>.

Bev Hoffman asked if ADF&G would consider 5-day closures instead of 7-days. Much discussion about the length of closures followed:

- Travis Elison explained why rolling closures needed to be 7-days long:
  - 3-4 day closures would be similar to the windows enacted in the early 2000's. Hamachan Hamazacki's study (2011) showed that these windows did not reduce harvest and they were not designed to.
  - If we want to meet the Chinook conservation Management Objective of 127,279 that the KRSWGMG agreed upon, we need to reduce harvest if the run does not appear sufficient to meet the midpoint of the forecast.
  - Last year ADF&G attempted to reduce harvest with longer closures in District 1. The first closure was a 4-day closure from June 16 to June 18. The second closure was a 5-day closure from June 23 to June 27.
  - In 2011, Travis explained, "Based on the subsistence harvest and on my personal take from subsistence harvest surveys....villages that fish in the tributaries (Akiak, Akiachak, Kwethluk, and Tuluksak) were the only villages that reported a lower harvest than 2010 (when there was a smaller total run). Therefore, the 4-day closures in 2011 did not result in a reduction of harvest.
  - *Note: Most Kuskokwim River villages reported slightly lower harvests in 2011 from recent years, however the villages listed above showed more substantial reductions than any others surveyed.*

- Fish move slowly, and the areas we are talking about are very large. Shorter time periods are insufficient to allowing fish to move out of the area before fishing recommences.
- Gene Peltola said that USFWS supports 7-day closures.
- Eva Patton (ONC) mentioned that the ONC Subsistence Committee met on June 5 to discuss points of concern between AVCP, KNA, and ONC. She responded to Travis, "There was concurrence on a number of points: ONC recognizes that the [2011] closures were not intended to meet overall escapement, but to distribute harvest throughout the river, [which] is one goal of interest for the upriver communities. The main interest of the ONC Subsistence Committee members was that we get to this point of the dialogue, recognizing that more than 4-day closures would be needed and to have the opportunity to work with the community well in advance to plan and notify for that process."
- Charlie Brown commented that the month of June is the best month for drying fish so he prefers a 3-4 day closure. Bev Hoffman responded that even in years without closures sometimes June can be bad drying weather. She said that we deal with weather all of the time and this year "we will just have to deal with the sacrifice that we are all making to get fish to the spawning grounds."

#### **OLD BUSINESS:**

1.) Bev Hoffman discussed her draft letter to the National Pacific Fisheries Management Council requesting the addition of a tribal member seat. Don Rivard (OSM) reminded Bev that such a request would take an act of Congress and could take many years. Bev replied that the KRSMWG and AVCP realize that it will be a long process.

2.) The KRSMWG had discussed writing a letter to Representative Bob Heron regarding House Bill 332 at the March 20 meeting. The bill was for the establishment of a Chinook research and restoration endowment. Lamont Albertson said that he had discussed the bill with people but had not sent a letter yet.

3.) Plans for public outreach for Chinook conservation were discussed:

- A call-in talk show on KYUK was scheduled for Monday, June 11, at 11:00 am. Fritz Charles, Travis Elison, and Robert Sundown volunteered to facilitate a discussion on Chinook conservation measures and answer questions from callers.
- Posters will be distributed throughout Bethel and distributed to communities. The KRSMWG requested that posters be given to organizations that have orientations for people new to the YK Delta, such as the Yukon-Kuskokwim Health Corporation and the Yukon-Delta School District.
- Anyone interested can join an email list for ADF&G news releases. The link can be found on the ADF&G website at:  
[http://www.adfg.alaska.gov/index.cfm?adfg=cfnews.cfnr\\_instructions](http://www.adfg.alaska.gov/index.cfm?adfg=cfnews.cfnr_instructions)
- Fritz Charles has a Yupik talk show on KYUK from 10-11 am and he offered to mention Chinook conservation.

4.) Bev Hoffman will write a letter of recruitment to fill the Upriver Elder seat.

5.) The group discussed creating a Calvin Simeon Award. John Linderman (ADF&G) suggested making it a re-occurring award. He also suggested that the KRSWMG approach John Oscar, who lives in Bethel, at the Kuskokwim River Watershed Council because Calvin Simeon was an active part of that organization.

**NEW BUSINESS:**

1.) AVCP and KNA submitted a letter to the KRSWMG on June 5 explaining their opinion of Chinook management. The letter included bulleted requests for information from ADF&G. ADF&G will give a presentation addressing the letter and requested information at the June 8 meeting. *Please see Appendix 2 to read the letter.*

**GENERAL COMMENTS FROM WORKING GROUP MEMBERS:**

Robert Lee Cander, a Bethel resident, commented that the water was very high and he never fishes when water levels are high. He also asked ADF&G where the Chinook in the early of the portion of the run go. Kevin Schaberg replied that information suggests that early fish are bound for upriver.

**WORKING GROUP ATTENDANCE:**

<b>MEMBER SEAT:</b>	<b>NAME:</b>
UPRIVER ELDER	<i>vacant</i>
DOWNRIVER ELDER	James Charles
COMMERCIAL FISHER	Charlie Brown
LOWER RIVER SUBSISTENCE	Mike Williams
MIDDLE RIVER SUBSTENCE	Gerald Simeon
UPPER RIVER SUBSISTENCE	<i>absent</i>
HEADWATERS SUBSISTENCE	Daniel Esai
PROCESSOR	Nick Souza (CVS)
MEMBER AT LARGE	Henry Lupie
SPORT FISHER	Lamont Albertson
WESTERN INTERIOR RAC	Carl Morgan
Y-K DELTA RAC	Bob Aloysius
ADF&G	Travis Elison
CHAIR	Bev Hoffman

**Other Participants:**

ADF&G Comm. Fish : Jon Linderman, Dan Bergstrom, Jan Conitz, Travis Elison, Kevin Schaberg, Alice Bailey, Chris Shelden, Zach Liller, Brittany Blain

Sport Fish : John Chythlook, Tom Talby

Subsistence Division: Hiroku Ikuta

USFWS: Dan Gillikin, Gene Peltola Jr., Dustin Carl, Tom Doolittle, Robert Sundown

OSM: Don Rivard, Pete Probasco, Pippa Kenner, George Papas, Tred Levik



Jeff Sanders Tim Andrew (AVCP) Iyana Gusty (ONC) Eva Patton (ONC) Mark Leary Angela Denning Barnes (KYUK radio) Dave Cannon (Napaimute)	Fritz Charles (alternate member) Carl Morgan (alternate member) Angie Morgan (alternate member) Maridon Boario (Sen. Hoffman's) Mike Thalhauser (KNA) La Donn Robbins (KNA) Gerri Sumpster (Sen. Murkowski's)
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**GLOSSARY OF ACRONYMS:**

Alaska Department of Fish and Game (**ADF&G**), Orutsararmiut Native Council (**ONC**), Kuskokwim Native Association (**KNA**), Association of Village Council Presidents (**AVCP**), U.S. Fish and Wildlife Service (**USFWS**), Bethel Test Fishery project (**BTF**), Catch Per Unit Effort (**CPUE**), Coastal Village Seafoods (**CVS**), ADF&G Commercial Fisheries Division (**CF**), ADF&G Sport Fisheries Division (**SF**), Regional Advisory Council (**RAC**), Kuskokwim River Salmon Management Working Group (**KRSMWG or Working Group, WG**), Sustainable Escapement Goal (**SEG**), Biological Escapement Goal (**BEG**), Management Objective (**MO**), Amounts Reasonably Necessary for Subsistence (**ANS**), Emergency Order (**EO**)

## **Appendix 1: ADF&G Rolling Closure Definitions:**

### **Lower Section of Subdistrict 1-B: Section 1**

This area is defined as, that portion of the Kuskokwim River and its tributaries upstream from a line from Apokak Slough to the southernmost tip of Eek Island to Popokamiut to a line between ADF&G regulatory markers located between the Kialik and Johnson Rivers. This area is also known as the Lower Section of commercial fishing Subdistrict 1-B.

Excluded waters are non-salmon spawning tributaries; those portions of Kinak, Kialik, and Tagayarak rivers more than 100 yards upstream from the mouth of these rivers, are open with any mesh size gillnet and are not affected by these closures.

### **Upper Section of Subdistrict 1-B to Tuluksak: Section 2**

This area is defined as that portion of the Kuskokwim River and its tributaries upstream from a line between ADF&G regulatory markers located between the Kialik and Johnson Rivers to a line between ADF&G regulatory markers located approximately half a mile upstream of the Tuluksak River mouth. This section includes the slough (locally known as Utak Slough) on the northwest side of the Kuskokwim River adjacent to the Tuluksak River mouth.

### **Tuluksak to Chuathbaluk: Section 3**

This area is defined as that portion of the Kuskokwim River and its tributaries upstream from a line between ADF&G regulatory markers located approximately half a mile upstream of the Tuluksak River mouth to a line between ADF&G regulatory markers located at the downstream edge of Chuathbaluk. This section does NOT include the slough (locally known as Utak Slough) on the northwest side of the Kuskokwim River adjacent to the Tuluksak River mouth.

Excluded waters are non-salmon spawning tributaries; the Whitefish Lake drainage near Aniak and those portions of Discovery, Birch, and Swift creeks more than 100 yards upstream from the mouth of these rivers, are open with any mesh size gillnet and are not affected by these closures.

### **Chuathbaluk to the Holitna River mouth: Section 4**

This area is defined as that portion of the Kuskokwim River and its tributaries upstream from a line between ADF&G regulatory markers located at the downstream edge of Chuathbaluk to a line between ADF&G regulatory markers located downstream of the Holitna River mouth.

### **The Holitna River mouth to the Headwaters of Kuskokwim River: Section 5**

This area is defined as that portion of the Kuskokwim River and its tributaries upstream from a line between ADF&G regulatory markers located downstream of the Holitna River mouth upstream to the headwaters of the Kuskokwim River.

## Appendix 2: Information Request by AVCP and KNA

June 5, 2012

Kuskokwim River Salmon Management Working Group,

On behalf of the Association of Village Council Presidents and Kuskokwim Native Association, we are writing this letter to express our shared concerns and recommendations regarding the Chinook salmon management recommendations presented to the Working Group on 5/30/12. Also, we would like to identify some topics that we feel should be addressed at the next meeting.

First we would like to express our concern about the management strategy that the Alaska Department of Fish and Game (ADF&G) recommended. Concerns regarding this stem from the distinct possibility that lowering escapement goals (or in this case an in-season management objective) would not lead to an increase in the number of fish returning to those rivers and would decrease Chinook densities and opportunities for middle and upper Kuskokwim subsistence users.

Along these same lines, we echo the statement by USFWS in the letter dated May 25, 2012 that the in-season management strategy of 2012 should have been developed cooperatively well in advance of the season. The suggested changes in management strategy will no doubt have a great effect on Chinook salmon on the Kuskokwim, people who depend on them, and it should have been developed as an open process that allows for input from all users. Second, AVCP and KNA feel that the recommendation of an 87,000 Chinook salmon total river escapement threshold for conservation management actions is drastically lower than historical total river escapement levels. Given what appears to be a period of low productivity seen throughout Western Alaska it is our opinion that this is not the time to drastically lower escapement objectives. The risk is especially poignant given the low numbers of females often seen in tributary escapements, such that lowered escapement goals could be formally achieved through a strong return of age-4 males while the abundance of females is inadequate to reseed the population. Instead, we feel it is more prudent to develop management strategies that focus on ensuring adequate numbers of females and larger Chinook on the spawning grounds as well as maintaining densities of Chinook salmon in the mainstem Kuskokwim River such that residents in the middle and upper Kuskokwim villages experience catch per unit efforts comparable to historical levels and most importantly to be able to reach their subsistence needs.

There still are conservation concerns on the lower tributaries of the Kuskokwim and we feel that it would be more appropriate to manage for a goal similar to historical escapements to ensure an adequate distribution of spawning Chinook, to ensure adequate numbers of females reach the spawning grounds and to maintain genetic diversity throughout the Kuskokwim drainage. Despite differences in opinion expressed during the Working Group meeting we maintain that managing for 87,000 total Kuskokwim River Chinook salmon escapement as a "management objective" by waiting until this threshold to enact conservation actions is, in fact, managing for the low end of the historical range of Chinook salmon escapements. Given uncertainties associated with forecasting and in-season projections and management, it is more appropriate to follow conservative approach targeting the mid-point (~ 136,000) of the suggested total river escapement range (~86,500-~185,000).

In order for us to better understand the new in-season management approach proposed by ADF&G, we request ADF&G provide the following information to us and the Working Group:

1. How many times has Kuskokwim River Chinook salmon escapement been close to 87,000 fish? (best if provided as a historical bar graph with 87,000 labeled)
2. Due to the fact that current changes are linked to the nearly completed Kuskokwim River Chinook Run Reconstruction, we would like to see in a, a bar chart of the historical run reconstruction with the 2012 forecast, recognizing the information is draft and subject to change.
3. How was the 2012 forecast determined and what confidence does the department have in that forecast? How well do the same forecasting methods perform in hind casting abundance in 2011, 2010, and 2009
4. Using the reconstructed subsistence harvest estimates, what is the average subsistence harvest of Chinook on the Kuskokwim?
5. Is there a final 2011 Chinook subsistence harvest estimate available?
6. We would like to see the relationship between Kogrukluuk with the lower river tributaries of concern with years labeled.
7. Finally, we would like to see the relationship between Kogrukluuk with Total escapements with the years labeled.

AVCP and KNA formally support the U.S. Fish and Wildlife alternative with a management objective of 133,000, with the understanding that this will likely result in restrictions to subsistence harvest. We support this objective for the following reasons:

- The 133,000 proposed management objective is much closer to historic average total escapement, so is more appropriate for addressing the catch per effort needs of subsistence fisherman.
- The 133,000 is the closest of the proposed escapement objectives to the mid-point of the ADF&G suggested total river escapement goal range presented at last week's meeting
- Given the associated uncertainties and impression of in-season management tools, namely the Bethel Test Fish, we support using a conservative approach of management that targets the mid-point of the range as the basis for inseason management actions.
- The 133,000 management objective will result in densities of fish upriver of Bethel, and resulting catch per unit effort, similar to what subsistence fishermen have historically experience and hence provide reasonable opportunity for families to achieve their subsistence needs.
- We recognize there are other additional benefits to the ecosystem associated with having more fish in the river.

AVCP and KNA support announcing to the public immediately that there will be management actions taken on the main stem Kuskokwim River to protect the run and that managers will ensure good outreach and clear radio communication to the public notifying fisherman when

there will be closures and when there will be opportunities to fish. We need to work collaboratively to ensure the public is informed and engaged with the conservation measures at the outset and throughout the fishing season. The communications need to be clear and consistent to avoid confusion and build understanding for conservation objectives; close collaboration with the working group, public, Native organizations, ADFG and USFWS is necessary to achieve this.

We support using Bethel Test Fish to monitor the run to determine the time when management actions would most likely have an effect to protect the run, specifically addressing concerns with escapement in lower river tributaries. We suggest a plan be developed now at the outset of the season to establish "windows" fishing with closures of 3-4 days in length. However, we do not recommend a closure at the very beginning of the subsistence fishing season for two reasons. First, allowing some harvest during the best weather for drying will result in less conservation concern as there will be a lower chance of spoilage. Second, closures later in the run should protect those fish bound for the lower tributaries and the older, larger females that tend to come later in the run.

We are interested in working further with ADFG and USFWS to develop salmon conservation initiatives that will best meet that goal with the least impact to meeting subsistence needs. We have faith that this management plan can be successfully implemented through the cooperative work that has been so successful in the past. Through great efforts by all parties, the Kuskokwim River has been a hallmark of effective cooperative management between federal and state agencies and the public, and we need to keep this relationship strong to see us through these trying times of low king salmon abundance.

We feel the strategies we've expressed in this letter are consistent with the conservation message endorsed over the last few years and that they are in the best interest of sustaining our king salmon run and the subsistence way of life for our represented members.

Sincerely,

Cynthia Navarrette  
Executive Director  
Kuskokwim Native Association

Myron Naneng  
President  
Association of Village Council President