PROPOSAL 107 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan. Close the Yukon River summer chum salmon commercial fishery to protect king salmon, as follows:

5 AAC 05.362 is amended to read:

No commercial openings on summer chum run in Yukon River as a means of protecting king run.

What is the issue you would like the board to address and why? At issue here the Tanana Rampart Manley Fish and Game Advisory Committee felt that while they support reasonable and sustainable commercial harvests they felt that management was unable to say no to the extreme pressures by commercial interests to have summer chum commercial openings and protect king salmon at the same time. Corruption of the pulse protection principle to not protect the last main

pulses of king salmon in order to allow commercial chum fishing sooner is an example. Members also pointed out regulations passed (fish wheel live box use) and management bowing to pressure to consider things such as drift seining and Board of Fisheries passing of beach seining and live box fishing for summer chum while releasing kings caught in same gear.

Basically members felt that until time can be found to deal properly with these issues the best move would be to stop all commercial summer chum fishing.

PROPOSED BY: Tanana Rampart Manley Fish and Game Advisory Committee

(EF-C15-023)

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PROPOSAL 108 – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan. Reduce management triggers in the Yukon River Summer Chum Salmon Management Plan based on the run size of summer chum salmon, as follows:

We suggest that:

1. Subsistence fisheries should be managed below the low end of the BEG range, 600,000 salmon, so that no less than 400,000 salmon are allowed to spawn;
2. The commercial exploitation rate shall be 50% of the commercially available harvestable surplus of runs between 700,000 and 800,000; and
3. The commercial exploitation rate shall be up to 100% of the commercially available harvestable surplus of runs in excess of 800,000.

Suggested changes to the Yukon River Summer Chum Salmon Management Plan follows:

5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan

(b) When the projected run size of summer chum salmon is **400,000** [600,000] fish or less, the commissioner shall, by emergency order, close the…

(c) When the projected run size of summer chum salmon is more than **400,000** [600,000] fish, but not more than **600,000** [700,000] fish,

(1) the commissioner shall close, by emergency order, the commercial, sport, and personal use directed summer chum salmon fisheries;

(2) the department shall manage the subsistence directed summer chum salmon fishery to achieve drainage-wide escapement of no less than **400,000** [600,000] summer chum salmon, except that, if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a less restrictive directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict.

(d) When the projected run size of summer chum salmon is more than **600,000** [700,000] fish, but not more than **700,000** [1,000,000] fish,…

(e) Notwithstanding (d) of this section, when the projected run size of chum salmon is more than **700,000** [900,000] fish, but not more than **800,000** [1,000,000] fish, the commissioner may, by emergency order, open a drainagewide commercial fishery to harvest up to 50,000 fish above

the run size of **700,000** [900,000] chum salmon distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.

(f) When the projected run size of summer chum salmon is more than **800,000** [1,000,000] fish, the commissioner may open, by emergency order, a drainagewide commercial fishery with the harvestable surplus distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.

What is the issue you would like the board to address and why? The Alaska Department of Fish and Game (ADF&G) recently completed a Biological Escapement Goal (BEG) analysis for Yukon River summer chum salmon. Based on that analysis, ADF&G may establish a BEG range for the entire Yukon River drainage of 600,000 to 1,000,000 salmon. The current Yukon River Summer Chum Salmon Management Plan was based on an implied drainage-wide escapement above Yukon Sonar project of at least 1,000,000 salmon. At that time, this implied escapement goal was based on the fact that half of the summer chum salmon passing the Yukon Sonar project site were destined to the Anvik River and that the established BEG for the Anvik River was point estimate of 500,000. At that time also, ADF&G assumed that productivity for the non-Anvik River stocks within the Yukon River drainage was probably similar to the Anvik River, so escapement to that portion of the drainage above the Yukon Sonar site should be similar.

Therefore, we ask the BOF to critically examine the current summer chum management plan and alter the trigger points in relation to the newly established drainage-wide summer chum salmon BEG, with consideration not to burden the subsistence fishery with Maximum Sustained Yield (MSY) management in years of low runs. Note that the strategy that allows the subsistence fishery to harvest summer chum salmon below the established BEG does not alter the trigger points that are associated with the commercial fishery.

Since there will likely be a new drainage-wide escapement goal for summer chum salmon, the management plan needs to be modified accordingly. We suggest that because Yukon River summer chum salmon have good production at low levels of escapement, subsistence harvests should be allowed to occur when runs are projected to provide for the escapements less than the lower end of the BEG. Note that there hasn't been an escapement below 400,000 salmon in recorded history, but escapements within the 400,000 to 500,000 range have produced well. For example, the estimated escapement of 486,000 salmon in 2000 produced an estimated 750,000 salmon, while the estimated escapement of 423,000 salmon in 2001, the lowest escapement recorded, produced a record 5.1M salmon, with an associated return per spawner (R/S) of 11.8, which is the also the highest on record. The only other escapement near the 600,000 lower end of the BEG range occurred in 1990 with an escapement of 622,000 salmon that produced the third highest return on record at 3.2M salmon, with a R/S of 4.9, which ranks second.

BEG-based management, on the average, is expected to produce MSY 90% of the time. We believe that when low runs occur (<600,000 salmon), management of the subsistence fishery to the attainment of escapements within the BEG is not in the best interest of the state. We believe that closing subsistence fisheries when runs are projected to be between 400,000 and 600,000 manages the stock for an expected MSY 4 or 5 years in the future on the backs of the subsistence fishers, which is unnecessary. The people of the Yukon River, particularly the people of the Lower Yukon Area, are extremely dependent on the summer chum salmon to sustain them

through the winter. It is, and always has been, the major and most important salmon species to for food. In our opinion, denying people the food they need because of MSY management is totally and absolutely wrong. Summer chum salmon subsistence fisheries of the Lower Yukon Area are necessary for the people's food security. The state should not be managing for future MSY when runs are below the low end of the BEG. I also note that in 2000 and 2001, ADF&G was reluctant to close the subsistence fisheries even though it was obvious inseason that the escapement target in the summer chum salmon management plan was not going to be achieved.

Strictly speaking, with an assumed subsistence harvest of 100,000 summer chum salmon, and in consideration of the established BEG, commercial fishing should be able to harvest the surplus over a run projected in excess of 700,000 salmon. However, we realize that the subsistence fishery may take more summer chum salmon because of the reduced king salmon subsistence harvest and that projections may not always be accurate. Therefore, we suggest that, similar to the present summer chum management plan, an exploitation rate of 50% be applied to the run between 700,000 and 800,000 salmon, with the possibility of full commercial exploitation on the commercially-available surplus for runs projected in excess of 800,000 salmon. This management strategy allows a commercial harvest to occur when runs are a full 200,000 fish less than the current management trigger point of 900,000 salmon. This change in the management plan will allow some income for commercial fishers when runs are lower than the current management plan triggers and will also foster maintaining commercial markets for the unique chum salmon of the Yukon River. Of course, we realize and expect that escapements should and will fall within the BEG, commensurate with run size. However, we also believe that ADF&G should do everything in their power to eliminate escapements in excess of 1.8M salmon. No escapements over 1.8M salmon have replaced themselves and usually have detrimental repercussions on the productivity of the stock.

Two other considerations should be discussed by the BOF regarding the summer chum salmon management plan: 1. Summer chum salmon subsistence harvests will probably fall below the assumed 100,000 salmon when more kings are taken for subsistence in the future, thereby eliminating that need for a buffer; and 2. The inability of the commercial fishery to efficiently harvest the commercial surplus available when king conservation strategies are in place, provides an additional buffer to escapement and subsistence needs. For example, in 2013 an estimated 1,487,000 summer chum salmon were available for harvest in Districts 1 and 2 of the Yukon Area. Actual commercial harvest was only 379,000 salmon, or about 25% of the allocation

PROPOSED BY: Kwik'pak Fisheries (EF-C15-123)

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<u>PROPOSAL 109</u> – 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan. Modify Yukon River Summer Chum Salmon Management Plan triggers, as follows:

5 AAC 05.362(a)–(f) are amended as follows:

(a) The objective of this management plan is to provide the department with guidelines to manage for the sustained yield of Yukon River summer chum salmon. The department shall use the best available data, including preseason run projections, test fishing indices, age and sex composition, subsistence and commercial harvest reports, and passage estimates from

escapement monitoring projects to assess the run size for the purpose of implementing this plan. **Management of the summer chum salmon fisheries may be affected during times of king salmon conservation.**

(b) When the projected run size of summer chum salmon is 600,000 fish or less, [THE COMMISSIONER SHALL, BY EMERGENCY ORDER CLOSE THE]

(1) **the commissioner shall close, by emergency order, the** commercial, sport, and personal use directed summer chum salmon fisheries;

(2) **the department may restrict or close the** subsistence summer chum salmon fisheries, except that, if indicators show an individual escapement goal in a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict.

(c) When the projected run size of summer chum salmon is more than 600,000 fish, but not more than **750,000** [700,000] fish,

(1) the commissioner shall close, by emergency order, the commercial, sport, and personal use directed summer chum salmon fisheries;

(2) the department **may restrict** [SHALL MANAGE] the subsistence [DIRECTED] summer chum salmon fishery [TO ACHIEVE DRAINAGEWIDE ESCAPEMENT OF NO LESS THAN 600,000 SUMMER CHUM SALMON], except that, if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a less restrictive directed subsistence summer chum fishery in that district, subdistrict, or portion of a district or subdistrict**;**

(3) if indicators show that individual escapement goals within a district, subdistrict, or portion of a district or subdistrict will be met, the commissioner may open, by emergency order, a summer chum fishery for commercial, sport, or personal use fishing in that district, subdistrict or portion of a district or subdistrict.

(d) **Repealed / /** [WHEN THE PROJECTED RUN SIZE OF SUMMER CHUM SALMON IS MORE THAN 700,000 FISH, BUT NOT MORE THAN 1,000,000 FISH,

(1) THE COMMISSIONER MAY OPEN, BY EMERGENCY ORDER, A SUBSISTENCE FISHERY WITH FISHING SEASONS AND PERIODS AS SPECIFIED IN 5 AAC 05.360(d);

(2) AND IF INDICATORS SHOW THAT INDIVIDUAL ESCAPEMENT GOALS WITHIN A DISTRICT, SUBDISTRICT, OR PORTION OF A DISTRICT OR SUBDISTRICT WILL BE MET, THE COMMISSIONER MAY OPEN, BY EMERGENCY ORDER, A SUMMER CHUM FISHERY FOR COMMERCIAL, SPORT, OR PERSONAL USE FISHING IN THAT DISTRICT, SUBDISTRICT OR PORTION OF A DISTRICT OR SUBDISTRICT].

(e) **Repealed / /** [NOTWITHSTANDING (d) OF THIS SECTION, WHEN THE PROJECTED RUN SIZE OF CHUM SALMON IS MORE THAN 900,000 FISH, BUT NOT MORE THAN 1,000,000 FISH, THE COMMISSIONER MAY, BY EMERGENCY ORDER, OPEN A DRAINAGEWIDE COMMERCIAL FISHERY TO HARVEST UP TO 50,000 FISH ABOVE THE RUN SIZE OF 900,000 CHUM SALMON DISTRIBUTED BY DISTRICT OR SUBDISTRICT IN PROPORTION TO THE GUIDELINE HARVEST LEVELS ESTABLISHED IN (g) OF THIS SECTION].

(f) When the projected run size of summer chum salmon is more than **750,000** [1,000,000] fish, the commissioner may open, by emergency order, a drainagewide commercial fishery

managed to achieve escapements within the established drainagewide escapement goal range of 600,000 – 1,000,000 summer chum salmon. The targeted harvest of the surplus will be [WITH THE HARVESTABLE SURPLUS] distributed by district or subdistrict in proportion to the guideline harvest levels established in (g) of this section.

What is the issue you would like the board to address and why? The Yukon River summer chum salmon management plan originated in 1990 with abundance and escapement triggers based upon historical estimates of abundance and potential escapement needs. The department is developing a Yukon River drainagewide escapement goal of 600,000 – 1,000,000 summer chum salmon. Therefore, some modifications of the summer chum salmon plan are appropriate at this time. The summer chum salmon escapement goal is based on a stock-recruit analysis aimed at maximizing sustainable yield in the fishery. However, escapements as low as 400,000 summer chum salmon have yielded a sustainable population. The amount necessary for subsistence (ANS) for summer chum salmon on the Yukon River is 83,500 – 142,192 fish. Recent subsistence harvests from 2010–2014 have ranged from 88,000 – 127,000 summer chum salmon. Given that escapements as low as 400,000 have yielded a sustainable population, there could be some flexibility for allowing subsistence opportunity at a run size at below 600,000. There is increasing demand for summer chum salmon to supplement declining king salmon subsistence harvests on the Yukon River. This proposal seeks to provide the department flexibility to provide a subsistence harvest when the summer chum salmon run size is at or near 600,000 fish. Other uses, primarily the commercial fishery, would be allowed commensurate with the new escapement goal and providing for the subsistence priority.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F15-028)

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PROPOSAL 110 – 5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan. Increase the commercial fishery threshold trigger in the Yukon River Drainage Fall Chum Salmon Management Plan, as follows:

5 AAC 01.249. **Yukon River Drainage Fall Chum Salmon Management Plan (3)(C)(5) is amended to read:**

> (5) when the projected run size is more than **600,000** [500,000] chum salmon, the commissioner may, by emergency order, open and close, commercial fisheries drainage-wide and manage the fisheries to achieve escapements within the established drainage-wide escapement goal range of 300,000 - 600,000 chum salmon; the targeted harvest of the surplus will be distributed by district or subdistrict proportional to the guideline harvest range established in 5 AAC 05.365; the department shall distribute the harvest levels below the low end of the guideline harvest range by district or subdistrict proportional to the midpoint of the guideline harvest range;

What is the issue you would like the board to address and why? When projected run estimates for Yukon River fall chum salmon are 600,000 or less, second pulse protection of fall chum would be put in place with no commercial fishing allowed in Districts Y1 through Y5 so

that sufficient fall chum salmon will move upriver to meet subsistence needs and escapement goals.

Fall chum is the only salmon available to the upper Yukon River communities since Chinook salmon declines and closure of all directed Chinook harvest projected for the foreseeable future. Fall chum salmon is now needed to provide food for Yukon River communities more than ever before. Protections are needed to ensure commercial harvest of fall chum in the lower Yukon River does not prevent subsistence families from meeting their harvest needs in the upper river. This proposal is to increase the threshold at which the fall chum salmon commercial fishery can open from projected run size of 500,000 chum salmon to 600,000 chum salmon.

What would happen if nothing is changed? The current fall chum salmon commercial fishery threshold trigger of 500,000 is the lowest it has ever been in regulation. While currently the fall chum returns have been strong, this may not continue to be the case in the future and regulations take a long time to go into effect to be responsive and thus require proactive conservation management. If the regulation is not changed the uncertainty of projected run size could cause circumstances again in the future where a commercial fishery is prosecuted and runs do not return as expected, causing escapement goals to not be met and also place all the burden of limiting harvest on subsistence communities in the upper river (as well as commercial and sport fisheries in District 5) in order to meet escapement goals. Fall chum salmon is relied on more heavily now by subsistence communities in times of low Chinook returns and any restriction to subsistence fall chum salmon harvest caused by overharvest in the commercial fisheries causes great hardship to subsistence communities in the upper Yukon River that have no other salmon options.

This commercial fishery threshold increase will help build in protection for uncertain run size projections so that more fall chum can move upriver where they are necessary to meet increasing subsistence needs in the upper river prior to any accidental overharvest in the lower river by missed projections and still will allow for the commercial opportunity for the lower river. Increasing the projected run size commercial fishing threshold trigger will be a tool for managers to assure escapement goals are achieved and subsistence needs are met in the upper river Yukon River districts prior to removal of fall chum salmon from the system before fully knowing the run strength. The example is that if fall chum salmon don't actually return in the numbers that were projected, but a commercial fishery is already prosecuted in the lower Yukon districts then subsistence fishing in district Y5 has to be restricted in order to meet escapement goals.

PROPOSED BY: Eastern Interior Alaska Subsistence Regional Advisory Council

(EF-C15-125)

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<u>PROPOSAL 111</u> – 5 AAC 05.360. Yukon River King Salmon Management Plan. Eliminate the use of GHLs in the Yukon River King Salmon Management Plan, as follows:

We recommend the elimination of the GHL in numbers of fish and just use the associated percentages that are already in regulation.

5 AAC 05.360. Yukon River King Salmon Management Plan

(b) The department shall manage commercial fishing as follows:

(2) the department shall manage the Yukon River commercial king salmon fishery [FOR A GUIDELINE HARVEST RANGE OF 67,350 - 129,150 KING SALMON, DISTRIBUTED AS FOLLOWS:

(A) DISTRICTS 1 AND 2: 60,000 - 120,000 KING SALMON;

(B) DISTRICT 3: 1,800 - 2,200 KING SALMON;

(C) DISTRICT 4: 2,250 - 2,850 KING SALMON;

(D) DISTRICT 5:

(i) SUBDISTRICT 5-B AND 5-C: 2,400 - 2,800 KING SALMON;

(ii) SUBDISTRICT 5-D: 300 - 500 KING SALMON; AND

(E) DISTRICT 6: 600 - 800 KING SALMON ;

(3) WHEN THE PROJECTED KING SLAMON HARVEST RANGE FOR DISTRICT 1 - 6 COMBINED IS BELOW THE LOW END OF THE HARVEST LEVEL FROM ZERO TO 67,350 FISH, THE DEPARTMENT SHALL ALLOCATE] **by allocating** the commercial harvest available by percentage for each district as follows:

(A) Districts 1 and 2: 89.1 percent;

(B) District 3: 2.7 percent;

(C) District 4: 3.3 percent;

(D) Subdistricts 5-B and 5-C: 3.6 percent;

(E) Subdistrict 5-D: 0.4 percent; and

(F) District 6: 0.9 percent.

What is the issue you would like the board to address and why? Yukon River commercial king salmon Guideline Harvest Ranges (GHR), in numbers of fish, are meaningless. They should be deleted because they do not represent expected commercial harvest of Yukon king salmon. Originally, they were established so that fishers could have some expectation of the harvest within a district or subdistrict. Commercial harvests of king salmon have not been within the guideline harvest level since 1999. The last directed king salmon commercial fishery occurred in 2007. The state prohibited the sale of incidentally caught king salmon from the directed summer chum salmon fishery in 2009, and from 2010 through 2014. Sale of incidentally caught king salmon caught in the fall season fisheries was prohibited since 2012. Drainage-wide commercial harvests of equal to or more than 67,350 king salmon are highly unlikely for the foreseeable future. Therefore it does not make any sense to have this GHR, expressed in numbers of fish, as an expectation in regulation.

We suggest using the percentages in regulation to distribute any commercially-harvestable surplus by district and or subdistrict.

PROPOSED BY: Kwik'pak Fisheries (EF-C15-124)

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