



United States Department of the Interior



FISH AND WILDLIFE SERVICE
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REPLY REFER TO: YDNWR

April 13, 2020

TO: Anthony Christianson, Chairman,
Federal Subsistence Board
Office of Subsistence Management
1011 E. Tudor Road
Anchorage, Alaska 99503

FROM: Ray Born, Acting Refuge Manager, Kuskokwim River Federal In-Season Manager,
Yukon Delta National Wildlife Refuge (YKD NWR)

RE: Kuskokwim River 2019 Salmon Management Questions

The following are responses to Federal Subsistence Board (Board) questions posed during the January 2020 Board meeting.

1. Explain actions taken by the Federal In-Season Manager after the Alaska Department of Fish and Game (ADF&G) implemented Emergency Order 3-S-WR-5-19?

Federal Subsistence Board Temporary Fishery Special Action (FSA) 19-02 closed Federal public waters of the Kuskokwim River drainage to the harvest of Chinook Salmon except by federally qualified subsistence users from June 1 to July 1. The Federal In-season Manager (Manager) discussed the options for the need to submit an emergency special action with the Office of Subsistence Management on June 25, 2019 and it was advised that no emergency special actions were required to open the Chinook Salmon fisheries on July 1 as Temporary FSA 19-02 would expire.

The ADF&G Emergency Order 3-S-WR-5-19 to open the Chum and Sockeye Salmon fishery was announced at the Kuskokwim River Salmon Management Working Group (KSMWG) meeting on the morning of June 26, 2019. At 1 pm on June 26, 2019, the Refuge In Season Manager participated in an emergency conference call with the Kuskokwim River Inter-Tribal Fish Commission (KRITFC) in-season managers, KRITFC Executive Director, KRSMWG advisor for KRITFC, the refuge fisheries biologist, and refuge subsistence coordinator. The unanimous consensus of the KRITFC in-season managers was to keep the Federal closure in place for Chinook Salmon despite the State Action that allowed harvest of Chum and Sockeye Salmon and potential incidental take of Chinook Salmon. On June 26, it was apparent that the mutually agreed upon escapement objective of 110,000 Chinook Salmon would likely be exceeded. Additionally, by June 26, the mutually agreed upon harvest target of 22,000 Chinook Salmon set by the KRITFC and In-season manager had been surpassed.

The In-season manager on June 26 had three options: (1) Do nothing and let the Temporary FSA 19-02 expire on July 1; (2) Rescind the Federal closure on Chinook Salmon (FSA19-02), that would nullify the Board action and go against the KRITFC request to see it remain in place; or (3) Close the Chum and Sockeye

salmon fisheries to only Federally qualified users. Pursuing option (3) to conduct an 815 closure for Chum and Sockeye Salmon, was not justifiable based on the best available data. There were no identified conservation concerns justifying closure of Chum and Sockeye Salmon runs and closure for the protection of Chinook Salmon was also not warranted based on in season data indicating escapement goals and harvest objectives for Chinook would be met.

Selecting option (1) to leave FSA 19-02 in place was selected for the following reasons; 1) Discouraged take of Chinook Salmon except by those who were federally qualified, 2) Honored the requests and/or actions of the KRITFC and Board and, 3) Created a decision based on the best available scientific data and that was legally justifiable.

2. What is the status of Kuskokwim River Chinook Salmon Management Plan that was started in October of 2019?

At the conclusion of the 2019 salmon season, a meeting was scheduled on October 22, 2019, in order to conduct a post-season review, discuss the development of a management plan, and discuss the formation of a Technical Advisory Body (TAB) (as identified in the Memorandum of Understanding (MOU)). It was decided at this meeting that formation of the TAB would be necessary to continue any discussions on the development of a management plan. It was also recognized that better communications should be established between all management partners. A follow up meeting was held December 17, 2019 to continue discussions on the formation and structure of the TAB. The Kuskokwim Salmon pre-season meeting occurred on March 13, 2020 to further refine the TAB structure and to begin preliminary talks on the upcoming salmon season. The TAB structure will be finalized in April or May by coordinators Aaron Moses (Yukon Delta National Wildlife Refuge (NWR)) and Kevin Wentworth (KRITFC).

Based on the results from the Preseason Kuskokwim River Chinook Salmon Science Workshop, January 21-23, 2020, the Yukon Delta NWR will cooperate with Orutsararmiut Native Council (ONC), Bering Sea Fisherman's Association (BSFA), and Native Village of Napiamute (NVN) on strategic planning to complete a Management Strategy Evaluation (MSE) based on the Bristol Bay work by Dr. Curry Cunningham from University of Alaska Fairbanks. The initial scoping for the evaluation is scheduled for May 13-14, 2020 and is being facilitated by BSFA. The MSE is a process for directly engaging a diverse array of fishery participants in the management process, formalizing different views of the important components of ecosystems that affect fish abundance, and identifying alternative objectives held by different stakeholders. A primary goal of the MSE process is to quantify trade-offs between competing objectives as a way towards developing consensus around one or more harvest strategies towards achieving sustainability of the resource while maximizing benefits to resource users. This process involves the direct collaboration between fishery stakeholders, fishers, and scientists, and relies on computer simulations to quantify the potential outcomes of alternative harvest strategies while accounting for important uncertainties in biological and fishery management systems. This MSE process will pull together all the stakeholders to identify users key objectives, evaluate tradeoffs for the objectives, identify risks associated with the tradeoffs, identify uncertainties in planning, identify alternatives that are acceptable to partners, and then develop a simulation to evaluate the alternatives. The process will require 4-5 meetings over a one to two-year period. Yukon Delta NWR is also willing to provide support for a graduate student to develop and run the simulations needed for the MSE as well as provide professional facilitation as identified in the literature. ONC is applying for a grant to convene the initial 2-3 meetings, with additional work being conducted by BSFA to secure other funding resources as well. We will need commitment from all managers of the Kuskokwim River Inter-Tribal Fish Commission and Alaska Department of Fish and Game to actively engage in this effort.

Thank you for considering the above information.

Vernon Ray Born
Federal In-Season Manager
Yukon Delta NWR

CC:Federal Subsistence Board

Regional Director, Alaska Region, USFWS

Assistant Regional Director, Office of Subsistence Management

Deputy Assistant Regional Director, Office of Subsistence Management

Fisheries Division Supervisor, Office of Subsistence Management

Chair, Yukon–Kuskokwim Regional Advisory Council

Chair, Western Interior Regional Advisory Council

Commissioner, Alaska Department of Fish and Game

Kuskokwim River Intertribal Fish Commission Executive Council

Kuskokwim River Salmon Management Working Group Co-Chairs

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