

Kuskokwim River Salmon Management Working Group

1 (800) 504-8071 Code: 5432709#

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

Meeting Agenda

Date: **November 3, 2012**

Time: **9:00 am to 12:00pm**

Place: **Longhouse, Bethel**

Time Called to Order

Chair

Time Adjourned

ROLL CALL TO ESTABLISH QUORUM: QUORUM MET? Yes / No

Upriver Elder:

Processor:

Downriver Elder:

Member at Large:

Commercial Fisher:

Sport Fisher:

Lower River Subsistence:

Western Interior RAC:

Middle River Subsistence:

Y-K Delta RAC:

Upper River Subsistence:

ADF&G:

Headwaters Subsistence:

INTRODUCTIONS:

INVOCATION:

APPROVAL OF AGENDA:

PEOPLE TO BE HEARD:

OLD BUSINESS:

1. Kuskokwim Area Board of Fish Proposals

- a. Notes from co-chair Greg Roczicka regarding BOF proposals.
2. Action items from previous meetings:
 - a. Working Group suggestions for improving the Kuskokwim River management plan.
 - b. Discussion/approval: Bev Hoffman's letter to recruit an upriver elder (letter distributed on September 29th).
 - c. Select a representative to attend the Board of Fish on behalf of the KRSMWG
 - d. Discussion of the Iyana Gusty Award (*raised by Bob Aloysius during the August 22 meeting*).
 - e. Lamont Albertson's letter in support of HB332 (*March 30 meeting*)
 - f. Lamont Albertson's letter in support of USFWS participation in the KRSMWG (*March 30 meeting*)
 - g. Review of KRSMWG Bylaws *Tabled until 2013*
 - h. Update KRSMWG Seats (roll-call list, possible alternates) *Tabled until 2013*

NEW BUSINESS:

1. Report: ADF&G Chinook Salmon Symposium in Anchorage on October 22-23 (*Greg Roczicka*)
2. USFWS Information request Letter

COMMENTS FROM WORKING GROUP MEMBERS:

NEXT MEETING DATE: _____ **Time:** _____ **Place:** _____

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Information Packet

November 3, 2012

Fisheries Proposals to the Board of Fish (January 2013)

<http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.main>

ALASKA BOARD OF FISHERIES 2012/2013 Cycle Tentative Meeting Dates and Locations

Bristol Bay, Arctic-Yukon-Kuskokwim, and Alaska Peninsula/Aleutian Islands Finfish; Statewide General Finfish Provisions; and Supplemental Issues

PROPOSAL DEADLINE: 5:00 p.m. Tuesday, April 10, 2012

Meeting Dates	Topics	Location	Comment Deadline
October 9-11, 2012 [3 days]	Work Session ACRs, cycle organization, Stocks of Concern	Anchorage EGAN Civic & Convention Center	Sept. 25, 2012
December 4-12, 2012 [9 days]	Bristol Bay Finfish	Naknek Bristol Bay Borough School	Nov. 19, 2012
January 15-20, 2013 [6 days]	Arctic-Yukon-Kuskokwim Finfish	Anchorage Sheraton Hotel	Jan. 2, 2013

Total Meeting Days: 33

Agenda Change Request Deadline: **August 27, 2012** [45 days prior to fall Work Session]

Updated: August 30, 2012

Notes from co-chair Greg Roczicka regarding BOF proposals:

Notes on PSLs for SWG/LKAC meeting

1. Proposal 104: Customary and Traditional Trade [revisit ANS] (ADF&G)
 - a. Request clarification about how any change to ANS will be determined (e.g. what years will be included?). Note that there are differences in how ANS range was determined in Yukon vs. Kusko (see BOF2013 Proposal 130 for Yukon)
 - i. Yukon ANS range is 1990-1999 low to high, while Kuskokwim ANS is low to average
 - ii. Yukon excludes years of subsistence restrictions. – was Kuskokwim the same?
 - b. Will lowest/highest harvest years be excluded from defining ANS range?
 - c. ADF&G: please have available for discussion at the WG meeting a table of the annual subsistence harvest estimates (Kusko River only)
 - d. How are years when subsistence restrictions occurred factored into considerations?
2. Proposal 105: Kuskokwim River Salmon Rebuilding Management Plan (ADF&G)
 - a. Entered by ADF&G as a placeholder, however, there are some notable language changes included
 - b. Molyneaux to provide update on status of cooperative plan development (draft?).
3. Proposal 106: Kuskokwim River Salmon Rebuilding Management Plan (AVCP)
 - a. Currently place holder
 - b. Three parts: drainage-wide goal, trib goal changes, and mgt plan.
 - c. Drainage-wide goal
 - i. the SOA Escapement goal team strongly encourage considering alternate goals based on other factors: see Hamazaki 20 August memo
 - ii. Discuss page 4 table in ADF&G 20 Aug 2012 memo from Hamazaki (“Kuskokwim Chinook salmon drainage-wide escapement goal”
 - iii. Have available for discussion table/graph showing R/S
 - iv. USFWS investigating alternate escapement goal analysis, maybe AVCP
 - v. OEG? Probably not
 - d. Tributary goal changes:
 - i. ADF&G please comment on potential for adding a “buffer” to the tributary goals. This could take the form of establishing and escapement goal range of x to y, but including provision that the escapement must include a minimum of XXX females or large kings.
 - e. Mgt Plan: needs to be developed as a collaborative effort between state/federal/stakeholder representatives to ensure concern are address and to ensure transparency of process
4. Proposal 107: Kuskokwim River king salmon [subsistence] possession limit (ONC)
 - a. Alternative to Tier II (will need to explain what Tier II is)?
 - b. Copy of court ruling and directive to the BOF regarding Proposal 200 of the March 2010 meeting?
 - c. Public acceptance of another layer of permitting.

5. Proposal 108: [Kuskokwim Management Area] Subsistence fishing [require permit for transport out of region] (ONC)
 - a. Black hole/ information gap brought up repeatedly; level of significance is unknown, but could be substantial.
 - b. Jurisdiction- which department?
 - c. For all species.
 - d. Time window? June-August
 - e.
6. Proposal 109: Customary trade of subsistence-taken finfish (ONC)
 - a. Explain what it is
 - b. Abused in some places
 - c. Proposal is based on current language in regulation for the Seward Peninsula, and consistent with federal proposal (companion proposal to Federal Subsistence Board)
7. Proposal 110: Gillnet specifications and operation (aka. Remove option to use up to 8 inch mesh in Chinook-directed commercial fishery; KRSMWG)
 - a.
8. Proposal 111: [close sport fishing on the Eek River] (Native Village of Eek)
 - a. Looking for proposer to explain
9. Proposal 112: [close all sport and commercial guide fisheries in the Kwethluk River from ...and limit subsistence nets to 4-inches] (Organized Village of Kwethluk and Kwethluk IRA)
 - a. Looking for proposer to explain

Board of Fish Proposals for Consideration

**ALASKA BOARD OF FISHERIES
JANUARY 15-20, 2013
KUSKOKWIM FINFISH**

PROPOSAL 104 – 5 AAC 01.286. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses. Review amounts reasonably necessary (ANS) for subsistence for salmon in the Kuskokwim River drainage as follows:

(a) The Alaska Board of Fisheries (board) finds that the following fish stocks are customarily and traditionally taken or used for subsistence:

- (1) halibut, Pacific cod, and all other finfish, except as specified in (2)–(4) of this section, in the Kuskokwim Area;
- (2) salmon in the Kuskokwim Area, except the Kuskokwim River drainage;
- (3) king, chum, sockeye, coho, and pink salmon in the Kuskokwim River drainage;
- (4) herring and herring roe, along the coast between the westernmost tip of the Naskonat Peninsula and terminus of the Ishowik River, and along the coast of Nunivak Island.

(b) The board finds that the following amounts of fish are reasonably necessary for subsistence uses:

- (1) 64,500–83,000 king salmon in the Kuskokwim River drainage;
- (2) 39,500–75,500 chum salmon in the Kuskokwim River drainage;
- (3) 27,500–39,500 sockeye salmon in the Kuskokwim River drainage;
- (4) 24,500–35,000 coho salmon in the Kuskokwim River drainage; and
- (5) 7,500–13,500 salmon in the remainder of the Kuskokwim Area.

ISSUE: This proposal provides an opportunity for the Alaska Board of Fisheries (board) and public to revisit the ANS for subsistence findings for salmon stocks in the Kuskokwim area. The ANS for subsistence findings in codified regulations were set by the board in 2001 based upon the harvest history on the Kuskokwim River during the years 1990–1999. The ANS ranges were based on the low harvest and mean (average) harvest over the 10 years (Table 1).

Table 1.–Estimated subsistence salmon harvests of Kuskokwim Area salmon used for ANS determination in 2001.

Kuskokwim River				Remainder of Kuskokwim Area					
	Minimum	Average	High	ANS		Minimum	Average	High	ANS
King salmon	64,795	82,762	96,436	64,500-83,000	King salmon	3,535	4,511	6,699	
Chum salmon	39,970	75,143	126,508	39,500-75,500	Chum salmon	1,006	3,004	4,961	
Sockeye salmon	27,791	39,204	52,984	27,500-39,500	Sockeye salmon	823	2,073	3,420	
Coho salmon	24,864	34,803	50,370	24,500-35,000	Coho salmon	1,682	3,416	5,922	
					Salmon				7,500-13,500

Kuskokwim Area subsistence salmon harvests have been estimated by ADF&G Division of Commercial Fisheries (1960–1987) and Division of Subsistence (1988–2007) annually since

1960. Harvest estimation methods changed in 1988 and again in 2008. The board may determine that an ANS revision may be justified due to a new harvest estimation method deployed retroactively by ADF&G Division of Commercial Fisheries beginning in 2008. This new method attempts to provide a more complete estimation of subsistence salmon harvests by species than previous methods. As a result, individual community estimates tend to be larger compared to estimates utilizing the previous method. The differences result from changes in the stratified sampling design and a new statistical approach that models harvest estimates from unsurveyed or underrepresented communities based on historical community-level harvest estimates.

WHAT WILL HAPPEN IF NOTHING IS DONE? Board assessments of subsistence salmon harvests relative to the codified ANS findings will be more challenging given methodological differences between new harvest estimates and existing ANS findings. These challenges relate to the fact that the new method tends to result in harvest estimates that are higher than the previous 1988–2007 estimates. If the ANS findings are not revised based upon this new method, then the existing ANS findings in regulation may underrepresent the amount of each salmon stock necessary for subsistence harvests.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? All users of the salmon resources of the Kuskokwim Area will benefit from decisions based upon the best available information, which provides the board with an unambiguous metric for assessing reasonable opportunities for subsistence uses of Kuskokwim Area salmon populations and stocks.

WHO IS LIKELY TO SUFFER? If the board chose not to revise ANS findings for Kuskokwim River salmon stocks, and the department continued to utilize the new harvest estimation method, then subsistence users may suffer because ANS findings would no longer be consistent methodologically with the annual harvest monitoring program.

OTHER SOLUTIONS CONSIDERED? No action. However, this proposal provides the board with the opportunity to update the ANS with the best available harvest information, as well as provides the public with an opportunity to review and comment upon the proposal regarding the ANS for subsistence uses of Kuskokwim Area king, chum, sockeye, and coho salmon stocks.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F12-220)

Requested Table: –Estimated number of salmon harvested for subsistence use in the Kuskokwim River, 1990 to 2009.

	Year	Chinook	Chum	Sockeye	Coho
	1990	109,778	153,825	45,897	57,560
	1991	74,820	87,237	47,370	39,252
	1992	82,654	116,391	43,514	52,299
	1993	87,674	59,797	51,616	28,485
	1994	103,343	76,937	42,362	36,609
	1995	102,110	70,977	30,905	36,823
	1996	96,413	100,913	40,591	43,173
	1997	79,381	37,366	38,744	29,816
	1998	81,213	61,732	36,103	24,667
	1999	72,775	44,242	47,360	27,409
	2000*	70,825	59,387	48,730	45,983
	2001	78,009	56,005	53,245	31,089
	2002	80,982	86,381	32,296	42,602
	2003	67,134	41,167	32,241	33,259
	2004*	97,110	64,899	40,405	48,898
	2005	85,090	58,013	41,589	33,378
	2006	90,085	89,620	43,315	41,408
	2007	96,155	73,603	47,339	35,332
	2008	98,103	68,633	58,729	46,463
	2009	78,231	43,635	39,941	29,561
Average Harvest	1990-1999	89,016	80,942	42,446	37,609
	2000-2009	84,172	64,134	43,283	38,797
	1990-2009	86,594	72,538	42,865	38,203

*Estimates include Kipnuk village. Surveys were not successfully conducted in Kipnuk during any other years listed.

PROPOSAL 105 – 5 AAC 07.365. Kuskokwim River Salmon Rebuilding Management Plan. Update and clarify *Kuskokwim River Salmon Rebuilding Management Plan* and strategies as follows:

5 AAC 07.365. Kuskokwim River Salmon Rebuilding Management Plan.

(a) The purpose of this management plan is to provide guidelines for the [REBUILDING AND] management of the Kuskokwim River salmon fishery that will result in the sustained yield of salmon stocks large enough to meet the escapement goals, amounts necessary for subsistence, and for nonsubsistence fisheries.

(b) It is the intent of the Board of Fisheries that the Kuskokwim River salmon stocks shall be managed [DURING JUNE AND JULY] in a conservative manner consistent with the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) **to meet escapement goals** and the subsistence priority.

(c) In the subsistence fishery, in the Kuskokwim River drainage, in the waters of the mainstem of the river and other salmon spawning tributaries, unless otherwise specified by the department,

(1) the subsistence salmon net and fish wheel fisheries will be open **seven** [FOR FOUR CONSECUTIVE] days per week [IN JUNE AND JULY AS ANNOUNCED BY EMERGENCY ORDER]; however, the commissioner may alter fishing periods by emergency order **consistent with migratory timing as the salmon runs progress upstream** based on run strength [AND] to achieve escapement goals;

(2) during subsistence closures **announced by emergency order,** [OF THREE CONSECUTIVE DAYS PER WEEK IN JUNE AND JULY,] all salmon nets with a mesh size larger than four inches must be removed from the water, and fish wheels may not be operated; [HOWEVER, THE COMMISSIONER MAY ALTER FISHING PERIODS BY EMERGENCY ORDER BASED ON RUN STRENGTH AND TO ACHIEVE ESCAPEMENT GOALS;]

(3) **repealed.** [AS THE SALMON RUN PROGRESSES UPSTREAM FROM DISTRICTS 1 - 2, AND FURTHER UPSTREAM, THE PROVISIONS OF (1) OF THIS SECTION WILL BE IMPLEMENTED IN THE MAINSTEM OF THE KUSKOKWIM RIVER AND SALMON SPAWNING TRIBUTARIES;]

(d) In the commercial fishery,

(2) only those waters of District 1 [DOWNSTREAM OF THE ADF&G REGULATORY MARKERS LOCATED AT BETHEL] may be opened during the first commercial salmon fishing period;

(3) the commissioner shall open and close the Kuskokwim River commercial salmon fishery by emergency order; [IF INSEASON INDICATORS OF RUN STRENGTH INDICATE A RUN STRENGTH THAT IS LARGE ENOUGH TO PROVIDE FOR A HARVESTABLE SURPLUS AND A REASONABLE OPPORTUNITY FOR SUBSISTENCE USES AND FOR NONSUBSISTENCE FISHERIES, THE SUBSISTENCE FISHING SHALL REVERT TO THE FISHING PERIODS AS SPECIFIED IN 5 AAC 01.260;]

(5) Districts 1 and 2 commercial fishing periods are from **12:00** [1:00] p.m. through **6:00** [7:00] p.m.; when longer fishing periods are allowed, the extra time is to be divided before **12:00** [1:00] p.m. and after **6:00** [7:00] p.m.;

(6) in June, **when** [AND UNTIL COHO SALMON RELATIVE ABUNDANCE EXCEEDS] chum salmon relative abundance **exceeds king salmon relative abundance**, the department shall manage, to the extent practicable, the commercial salmon fishery based on the chum salmon run strength;

(8) [WHEN CHUM SALMON ABUNDANCE IS SUFFICIENT TO PROVIDE FOR ESCAPEMENT AND SUBSISTENCE NEEDS, AND] when coho salmon relative abundance exceeds chum salmon relative abundance, the department shall manage, to the extent practicable, the commercial salmon fishery based on the strength of the coho salmon run;

(9) **repealed.** [WHEN THE CHUM SALMON RUN IS PROJECTED TO BE INADEQUATE TO MEET ESCAPEMENT AND SUBSISTENCE NEEDS, THE DEPARTMENT SHALL MANAGE THE COMMERCIAL COHO SALMON FISHERY TO MINIMIZE THE INCIDENTAL HARVEST OF CHUM SALMON AND TO PROVIDE FOR COHO SALMON ESCAPEMENT AND SUBSISTENCE NEEDS;]

(11) If the king salmon run is projected to be inadequate to meet escapement goals and to provide for a reasonable subsistence opportunity, and if the commissioner determines that there is a harvestable surplus of chum salmon sufficient to provide for escapement needs and a reasonable opportunity for subsistence, the commissioner may, by emergency order, open a directed chum salmon fishery and the department shall manage to the extent practical, the commercial chum salmon fishery to minimize the harvest of king salmon.

ISSUE: This proposal requests changes to the Kuskokwim River management plan to reflect current management practices, and provides greater flexibility during periods of conservation need for salmon in order to meet escapement, provide for subsistence opportunity, and manage overlapping salmon runs. The proposal would also allow for the opportunity to commercially harvest chum salmon when abundance is beyond what is necessary for escapement and subsistence.

In January 2001, the Alaska Board of Fisheries modified the *Kuskokwim River Salmon Rebuilding Management Plan* to provide guidelines for management of subsistence, commercial, and sport fisheries for Kuskokwim River salmon. Management of the Kuskokwim River salmon fishery is complex due to overlapping multi-species salmon runs, and subsistence and commercial fisheries. Salmon fishery management has been very conservative and the commercial fishery closed unless king and chum salmon run strength are clearly adequate to provide for escapement and subsistence needs. The purpose of the management plan is to provide guidelines for management of the Kuskokwim River salmon fishery that ensure the sustained yield of salmon stocks large enough to meet escapement goals, reasonable subsistence opportunity, and harvests for fisheries other than subsistence.

A set subsistence fishing schedule was established within the original plan, but is not necessary every year. If subsistence closures are established, the department needs flexibility in the

duration of the closure and the ability to progressively implement such closures upstream as salmon migrate.

Commercial fishing throughout most of the 2000s was limited by stock of concern designations for king and chum salmon, poor market conditions for chum salmon, limited processing capacity, and low effort. Market conditions for chum salmon have improved in recent years; however, the fishery is still limited by processing capacity and low effort. Given record king, chum, and sockeye salmon escapements observed from 2004 to 2006, large surpluses of these species were available for commercial harvest, but were underexploited given the conditions listed above. Returns of king salmon from these record escapements have produced poor returns in recent years. Measures taken to conserve king salmon have resulted in forgone commercial chum salmon harvest and these fish continue to be underexploited despite available harvestable surpluses beyond escapement and subsistence needs. Managing for overlapping salmon species based upon abundance, while minimizing the harvest of a less abundant species to the extent practical will benefit resource users.

WHAT WILL HAPPEN IF NOTHING IS DONE? The existing plan does not reflect current management practices and provides less flexibility in management of overlapping salmon runs than the proposed plan. More flexibility will ensure Kuskokwim River salmon runs are managed for sustained yield.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? The resource and fishermen.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F12-223)

PROPOSAL 106 - 5 AAC 07.365. Kuskokwim River Salmon Rebuilding Management Plan. Adopt a drainagewide optimum escapement goal (OEG) for king salmon in the Kuskokwim River, adjust tributary goals accordingly, and add preseason and inseason management tools as follows:

The preferred solution is for 1) the Board to adopt a drainage-wide OEG for Kuskokwim River Chinook salmon in lieu of the ADF&G goal, 2) for any adjustments made to tributary goals to be based on the OEG rather than the ADF&G goal, and 3) for a management plan be developed that provides pre-season and in-season guidelines for achieving the escapement goals. In-season guidelines should direct managers to take actions that target achieving the mid-point of the escapement goal range when using in-season tools to project end-of-season escapements. Currently the primary in-season tool is the Bethel Test Fishery, which has limited precision in projecting final escapements. Given this imprecision, managers would need to target the mid-point of the escapement goal in order to assure ultimately achieving escapement within the escapement goal range. The management plan should also detail how localized management actions could be taken to protect individual tributaries experiencing low returns. Finally, the Department should consider including minimum numbers of female Chinook salmon required at monitored tributary escapements.

ISSUE: The Alaska Department of Fish and Game (ADF&G) intends to adopt a drainage wide escapement goal for Kuskokwim River Chinook salmon, and we request the Board consider establishing an Optimal Escapement Goal (OEG) in lieu of the ADF&G goal. The ADF&G goal is to be based on a recent retrospective run reconstruction. Details about the run reconstruction have not been released, and details about the analysis for developing the escapement goal have yet to be determined by ADF&G.

Linked to this drainage wide goal, ADF&G plans to adjust existing tributary goals so that they are in proportion to each tributary's average contribution to drainage wide escapement, and we request that any such changes be proportioned based on the OEG rather than the ADF&G goal. Again, details from ADF&G are lacking, but the key risk is that under the ADF&G goal there may be inadequate numbers of females in the tributary escapements. The concern is maintaining genetic diversity throughout the drainage.

We also understand that Department is considering submitting a placeholder Management Plan for the Kuskokwim River Chinook Management. A final concern is the lack of Management Plan details that should provide guidelines to managers and the public as to how ADF&G plans to proceed in-season to achieve the escapement goal. Currently the primary in-season tool is the Bethel Test Fishery, which has limited precision in projecting final escapements.

WHAT WILL HAPPEN IF NOTHING IS DONE? If the ADF&G goal is too low, as might occur if based strictly on Ricker spawner-recruit analysis, it may at times reduce densities of fish to such low levels that subsistence fishermen will need to significantly increase fishing time to catch the same amount harvested historically, which would be a substantial economic hardship. If not adopted, at risk is providing adequate subsistence harvest opportunity, and the ability of subsistence fishermen to harvest salmon within the range of Amounts Necessary for Subsistence.

At risk is assuring adequate distribution of spawners throughout the drainage, and assuring adequate numbers of spawning females. Both could have negative consequences in maintaining genetic diversity throughout the drainage. Also at risk is the long-term sustainability of the fishery should escapement distribution be inadequate and/or inadequate numbers of females Chinook salmon be allowed to spawn (i.e., inadequate egg deposition, which could lead towards perpetuating low returns).

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? This should not affect fish quality. However, the quality of escapement maybe affected. At risk is providing adequate numbers of females Chinook in the escapement; i.e, inadequate egg deposition, which could lead towards perpetuating low returns.

WHO IS LIKELY TO BENEFIT? Those most likely to benefit are subsistence fishermen, particularly subsistence fishermen upstream of Subdistrict W1-B, who will be assured catch rates (densities of salmon available for harvest, or fish per hour) comparable to historical levels.

WHO IS LIKELY TO SUFFER? Those most likely to suffer are also subsistence fishermen, particularly those within Subdistrict W1-B, who may be subjected to harvest restrictions in order to pass fish upstream to meet escapement goals and to provide for upriver subsistence harvest opportunity. Commercial fishermen would also suffer because in some years there may be foregone commercial harvest to achieve escapements above Maximum Sustained Yield and to provide for subsistence harvest opportunity.

OTHER SOLUTIONS CONSIDERED? Other alternatives are to 1) accept the ADF&G goal without a management plan but the details are unknown) 2) Request that ADF&G to take no action at this time; i.e., post-pone establishing the drainage-wide escapement goal and consequent modification to tributary goals until: 1) full vetting occurs of the Chinook salmon run reconstruction including review from non-ADF&G experts, 2) reasonable local outreach can occur that informs stakeholders of the intended actions and allow ADF&G opportunity to gather public input and address concerns.

Not having adequate information available about the Department’s plan leaves only the option to recommend that an OEG be established.

PROPOSED BY: Association of Village Council Presidents (HQ-F12-079)

PROPOSAL 107 - 5 AAC 01.2XX. Kuskokwim River king salmon possession limits. Allow subsistence taking of 10 or more king salmon only for drying and cold-smoke use in the Kuskokwim River Area as follows:

The taking and use of more than ten (10) subsistence caught Chinook salmon per household in June is only allowed for the seasonally dependent processing and preservation practice of outdoor drying and “cold” smoking.

This is consistent with the Board’s discretion for application of subsistence criteria, and in accordance with directives in 4FA-09-1515 Civil (Ref BOF Proposal #200 of March, 2010 meeting), regarding 5AAC 99.010 (b), that “The Board can look to see that the taking and use reflects the cultural, social, spiritual and nutritional values embodied in subsistence laws.” to further the standard of protecting a subsistence way of life; and consistent with AS 16.05.258(b)(2)(A) that the Board “shall adopt regulations that provide a reasonable opportunity for subsistence uses of those stocks or populations;” or, (C) that the Board “shall adopt regulations to differentiate among consumptive uses that provide for a preference for the subsistence uses, if regulations are adopted under (B) of this paragraph”.

Neither should this proposal in any way be misconstrued, interpreted or adapted to trigger the need to consider establishing a Tier II subsistence fishery in the Kuskokwim Area under A.S. 16.05.258(b)(4) or 5 AAC 99.010(c), since reasonable opportunity for ALL subsistence uses of ALL subsistence users is maintained, and this Board action would not reduce them below that level. Yet at the same time it could significantly reduce overall harvest impact on quantity and quality of related management, subsistence use and escapement objectives for the Kuskokwim Management Area.

ISSUE: 1) Harvest and processing limitations in customary and traditional subsistence use of Kuskokwim King salmon;

- 2) The need for the oldest and most practical methods and means of preserving sufficient quantities of King salmon for the winter, is dependent on this seasonal activity occurring during June (i.e. “dry fish”), whereas those involved with more recent technological methods are not (i.e. “freezer/export fish”); and
- 3) The increasing levels of individuals who catch large amounts of “freezer/export fish” opportunistically are largely lacking in the region’s cultural background, and do not have a similarly situated level of need.

WHAT WILL HAPPEN IF NOTHING IS DONE? The oldest and most practical customary and traditional practice of drying and smoking enough King salmon for subsistence use throughout the winter will continue to be diminished or denied at the expense of more recent activities. In addition the cultural teachings inherent to the multi-family and multi-generational practice directly associated with summer fish camp and dry fish processing/preservation activities will continue to be increasingly disenfranchised. Ten (10) King salmon per household should be more than adequate to satisfy the “freezer/export fish” component of the harvest.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Removal of restrictions imposed at the expense of a subsistence activity for an essentially opportunistic one, could go far towards improving the full range of management objectives.

It would also reduce the amount of unavoidable and shameful waste of time, effort and resource which occurs when management actions force people to harvest and process their yearly subsistence needs for salmon later in the season: When the weather patterns deteriorate and cause loss through souring and rot, and causing much greater amounts of fly egg deposition with resulting prevalence of maggot infestation.

WHO IS LIKELY TO BENEFIT? The vast majority of fishers throughout the drainage who depend on use of Kuskokwim King salmon for their families' primary winter supply of subsistence fish .

WHO IS LIKELY TO SUFFER? Individuals who would opportunistically harvest subsistence King salmon without limitation, regardless of individual need, processing/use capability or extended negative impacts to others.

OTHER SOLUTIONS CONSIDERED? The prospect of Community Harvest Permits could be explored or incorporated for points of issue in this proposal, but uncertain as to what extent they would be effectively addressed.

PROPOSED BY: Orutsararmiut Native Council (HQ-F12-147)

PROPOSAL 108 - 5 AAC 01.280. Subsistence fishing permits. Require a permit and reporting requirements for all subsistence-caught salmon transported out of the Kuskokwim Management Area as follows:

Require a permit and reporting requirement for all subsistence caught salmon transported out of the Kuskokwim Management Area.

ISSUE: There is no existing method or means of tracking the numbers or species of salmon being shipped out of the Kuskokwim Area other than commercial harvests. Local observations from Bethel residents over the last three-four years report increasing numbers of individuals traveling back and forth throughout the season with full allocation of 150# baggage in fish boxes each time. The Kuskokwim Salmon Management Working Group requested assistance from the USFWS to pursue the matter, but were informed it was not in their area of jurisdiction. Requests were made of regional air freight, cargo and passenger airlines to provide this information voluntarily, but they declined to do so. Anecdotal reports are heard from the middle and upper river of more people coming in to fish the Kuskokwim – especially for King salmon, since so many other areas have been severely restricted or closed altogether in recent years. We may only speculate at present on how much impact this activity is having on Kuskokwim salmon stocks – or what level if any may be associated with commercial interests.

WHAT WILL HAPPEN IF NOTHING IS DONE? The current situation will continue and can only get worse.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Not Applicable.

WHO IS LIKELY TO BENEFIT? Subsistence fisheries that rely on Kuskokwim salmon for primary source of sustenance. Management entities that currently have no other reliable means of data gathering or accounting for these salmon numbers in management decisions.

WHO IS LIKELY TO SUFFER? Anyone who may be taking advantage of, or abusing, the ability to gather large quantities of salmon from the Kuskokwim area for personal gain.

OTHER SOLUTIONS CONSIDERED? None that would adequately address scope of the issue or current anecdotal aspect.

PROPOSED BY: Orutsararmiut Native Council (HQ-F12-148)

PROPOSAL 109 - 5 AAC 01.2XX. Customary trade of subsistence-taken finfish. Allow for sale of subsistence-taken finfish in the Kuskokwim River Area as follows:

Add a new section in Article 5 as 5 AAC 01.xxx for Customary Trade of subsistence-taken finfish.

(a) In the Kuskokwim Area, the customary trade of subsistence-taken finfish is permitted as specified in this section. A person who conducts a customary trade in subsistence-taken finfish under this section must: (1) obtain a customary trade record keeping form from the department before the person conducts the customary trade, and accurately record the cash sale on the form within the 24 hours after the sale occurs; the form requires the reporting of (A) the date of each sale; (B) the buyers name and address; (C) the species and amount of finfish sold; (D) the location where the finfish were harvested; (E) the dollar amount of each sale; (F) the form of processing used; and (G) any other information the department requires for management or enforcement purposes; (2) return the customary trade record keeping form to the department as prescribed by the department on the form; (3) display the customary trade record keeping form upon request by a local representative of the department or a peace officer of the state.

(b) A person may not sell subsistence-taken finfish under this section for more than \$500 total per household in a calendar year.

(c) A person who receives subsistence-taken finfish in exchange for cash in a customary trade may not resell the fish.

(d) A sale or purchase of finfish authorized under this section, including the delivery of fish to a purchaser, may occur only in the Kuskokwim Area.

ISSUE: Escalating levels of, and concerns about, present and future individuals selling fish for significant cash income (i.e. commercial activities) under protection of customary trade.

WHAT WILL HAPPEN IF NOTHING IS DONE? As the human population of the area (thru either resident or in-migration) continues to increase this problem can only get worse. If it is not addressed now, it will only be putting it off to be “solved” later.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Not Applicable

WHO IS LIKELY TO BENEFIT? The vast majority of subsistence fishers in the Kuskokwim area.

WHO IS LIKELY TO SUFFER? Individuals present and future who take advantage of the lack of limitations to essentially practice commercial activities under a protective guise of customary trade.

OTHER SOLUTIONS CONSIDERED? Status quo – Unacceptable

PROPOSED BY: Orutsararmiut Native Council (HQ-F12-149)

PROPOSAL 110 - 5 AAC 07.331. Gillnet specifications and operations. Remove the option for gillnet mesh to be up to 8 inches in District 1 of the Kuskokwim River Area as follows:

5 AAC 07.331 (c) In Districts 1 and 2, salmon may be taken only with gillnets with six-inch or smaller mesh. [, EXCEPT THAT IN DISTRICT 1, THE COMMISSIONER MAY OPEN FISHING PERIODS, DURING WHICH THE GILLNET MESH SIZE MAY BE NO GREATER THAN EIGHT INCHES.]

ISSUE: The allowance of up to 8” mesh gear in W-1 of the Kuskokwim commercial fishery remains in regulation, while the large Chinook salmon (primarily females) that would be targeted by this gear should be directed towards enhancing the quality of escapement, with any harvestable surplus of that stock component fully allocated to the subsistence fishery.

WHAT WILL HAPPEN IF NOTHING IS DONE? An unnecessary regulation will remain on the books.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Adoption of this regulation is consistent with the escapement and subsistence priority management objectives in the Kuskokwim River.

WHO IS LIKELY TO BENEFIT? People who rely on the long-term integrity of Kuskokwim Chinook salmon stocks.

WHO IS LIKELY TO SUFFER? Those who might attach some sentimental value to the illusory hope of returning to the directed commercial Chinook fishery of 1973-1985 (appx.).

OTHER SOLUTIONS CONSIDERED? We initially considered amending the regulation to remain effective only after July 1, but further discussions supported eliminating it altogether as a more realistic action.

PROPOSED BY: Kuskokwim River Salmon Management Working Group (HQ-F12-150)

PROPOSAL 111 - 5 AAC 71.010. Seasons and bag, possession, and size limits for the Kuskokwim – Goodnews Area. Close all sport fishing on the Eek River as follows:

Closed to Sport Fishing: All species of fish on the Eek River.

ISSUE: Sport Fishing on the Eek River.

WHAT WILL HAPPEN IF NOTHING IS DONE? The village of Eek has a long standing law passed down from our Elders not to play with our food.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The Proposal will bring the use of this river to what it has always been used for by the First Peoples- A Subsistence Gathering River.

WHO IS LIKELY TO BENEFIT? All subsistence users.

WHO IS LIKELY TO SUFFER? No-one.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Native Village of Eek (HQ-F12-152)

PROPOSAL 112 - 5 AAC 01.270. Lawful gear and gear specifications and operations; 5 AAC 07.331 Gillnet specifications and operations; 5 AAC 71.010. Seasons and bag, possession, and size limits for the Kuskokwim - Goodnews Area. Close all sport and commercial guide fisheries in the Kwethluk River from June 1 through July 25 and limit the size of net gear used in both subsistence and commercial fisheries for the same time frame as follows:

1. Allow subsistence fishing using only 4” or less mesh size setnets (no more than 60’ in length).
2. Allow driftnets with only 4” or less mesh size nets no more than 60’ in length.

ISSUE: Close all sport fisheries and commercial guiding operation from June 1-July 25 every summer from the mouth of Kwethluk River to the headwaters.

WHAT WILL HAPPEN IF NOTHING IS DONE? Whenever there is subsistence closures on the river(s)- sports fisher are allowed to fish any species of fish (including salmon).

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? It will enhance the escapement of salmon spawners to their spawning grounds at the headwaters of salmon stream.

WHO IS LIKELY TO BENEFIT? Everyone, it will enhance the biological health of the salmon species on the Kwethluk River.

WHO IS LIKELY TO SUFFER? Commercial guide operators from June 1-July 25 (only).

OTHER SOLUTIONS CONSIDERED? (1) whole mainstem closure- to will hurt subsistence fishers.

PROPOSED BY: Organized Village of Kwethluk, Kwethluk IRA Council (HQ-F12-072)



ADFG

Sport Fish Harvest and Catch Estimates

For review of Board of Fisheries Proposals

John Chythlook

10/29/2012

Arolik River Sport Fish Salmon Harvest

Year	Resp.	Anglers	Days		Coho	Sockeye	Pink	Chum
			Fished	King				
2001	1	14	14	0	0	0	0	0
2002	13	199	765	75	22	0	0	0
2003	3	38	0	0	0	58	0	0
2004	10	316	12	0	12	65	0	0
2005	8	184	421	0	0	0	0	0
2006	7	160	642	0	0	12	0	0
2007	8	184	922	50	0	0	0	0
2008	7	157	0	0	110	78	0	0
2009	11	281	51	0	38	46	14	0
2010	11	257	0	0	0	93	0	0
2011	14	359	34	17	17	306	0	0
10 year ave.	8	179	283	13	18	35	1	0
5 year ave.	9	208	323	10	30	46	3	0

Arolik River Sport Fish Salmon Catch

	Resp.	Anglers	Days		Coho	Sockeye	Pink	Chum
			Fished	King				
2001	1	14	14	0	97	68	0	0
2002	13	199	765	450	1,179	161	49	590
2003	3	47	249	36	231	60		69
2004	10	285	1,461	780	3,134	226	667	2,211
2005	8	184	421	0	2,397	0		0
2006	7	160	642	399	219	276	167	162
2007	8	184	922	1,997	625	0	15	1,362
2008	7	157	457	69	212	485	283	714
2009	11	281	852	210	2,252	623	350	542
2010	11	257	786	82	920	438	298	430
2011	14	359	1,431	1,288	1,299	250	44	859
10 year ave.	8	177	657	402	1,127	234	229	608
5 year ave.	9	208	732	551	846	364	223	642

Kanektok River Sport Fish Salmon Harvest							
Year	Days Fished	Anglers	King	Coho	Sockeye	Pink	Chum
2001	9,063	1,111	947	2,448	83	0	43
2002	5,885	935	799	1,784	73	63	446
2003	7,665	1,045	323	1,076	107	10	14
2004	6,364	998	228	1,362	112	98	33
2005	5,789	1,053	520	1,006	156	31	108
2006	7,861	1,136	754	1,742	523	13	145
2007	5,071	880	633	1,087	385	0	15
2008	8,024	1,310	220	1,541	654	0	48
2009	3,267	748	400	876	75	112	44
2010	5,307	1,078	552	1,280	404	51	150
2011	7,235	1,172	891	981	429	0	271
10 year ave.	6,430	1,029	538	1,420	257	38	105
5 year ave.	5,906	1,030	512	1,305	408	35	80
Kanektok River Sport Fish Salmon Catch							
2001	9,063	1,111	10,482	21,941	1,415	376	6,457
2002	5,885	935	3,815	10,922	1,423	5,944	10,779
2003	7,665	1,045	3,480	19,257	5,082	479	7,138
2004	6,364	998	1,754	10,985	891	2,291	1,757
2005	5,789	1,053	10,116	13,279	5,692	1,831	9,241
2006	7,861	1,136	7,292	12,282	11,450	6,743	21,258
2007	5,071	880	6,331	12,768	3,481	842	7,971
2008	8,024	1,310	2,495	18,086	6,776	17,057	9,231
2009	3,267	748	2,522	6,896	768	492	3,802
2010	5,307	1,078	2,619	7,192	4,872	5,870	10,298
2011	7,235	1,172	6,911	11,506	5,260	355	9,541
10 year ave.	6,430	1,029	5,091	13,361	4,185	4,193	8,793
5 year ave.	5,906	1,030	4,252	11,445	5,469	6,201	10,512

Eek Sport Fish Harvest

Year	Responses ^a	Anglers	Days Fished	King	Coho	Sockeye	Pink	Chum	Dolly Varden Arctic Char	Rainbow Trout	Grayling
	2001	0									
2002	0										
2003	3	40	228	73	0	0	0	0	78	0	98
2004	3	67	86	0	0	0	0	0	0	0	11
2005	3	71	93	0	24	0	0	0	35	0	48
2006	1	18	14	31	0	12	0	0	0	0	20
2007	0										
2008	0										
2009	0										
2010	0										
2011	2	37	332	0	64	0	0	0	0	0	98
Ave. 2001-2010		49	105	26	6	3	0	0	28	0	44
Ave. 2006-2010		18	14	31	0	12	0	0	0	0	20

^a Number of anglers estimated by Statewide Harvest Survey responses. Years in which there were no responses don't necessarily reflect zero participation in the sport fishery.

Eek Sport Fish Catch

Year	Responses ^a	Anglers	Days Fished	King	Coho	Sockeye	Pink	Chum	Dolly Varden Arctic Char	Rainbow Trout	Grayling
	2001	0									
2002	0										
2003	3	40	228	479	50	0	21	0	164	0	674
2004	3	67	86	0	146	0	0	0	0	0	147
2005	3	71	193	0	24	0	0	0	588	0	803
2006	1	18	114	471	0	61	90	49	83	0	492
2007	0										
2008	0										
2009	0										
2010	0										
2011	2	37	332	0	200	0	0	0	0	0	569
Ave. 2001-2010		49	155	238	55	15	28	12	209	0	529
Ave. 2006-2010		18	114	471	0	61	90	49	83	0	492

^a Number of anglers estimated by Statewide Harvest Survey responses. Years in which there were no responses don't necessarily reflect zero participation in the sport fishery.

Kwethluk River Harvests 2001-2011

	Anglers	Days fished	King	Coho	Sockeye	Pink	Chum	Lake trout	Dolly Varden	Rainbow trout	Grayling	Whitefish	Pike
2001	259	1,069	43	237	0	71	0	33	0	17	77	0	14
2002	223	920	30	153	0	0	34	36	53	0	226	0	78
2003	504	2,044	103	824	42	0	0		77	21	23	15	12
2004	1,467	2,021	150	649	0	65	0	60	230	117	23	0	289
2005	333	440	65	387	112	35	80	0	106	53	83	0	143
2006	396	1,216	183	669	0	67	0	0	76	0	97	0	0
2007	272	297	93	0	0	0	0	0	31	0	0	0	10
2008	239	1,092	149	117	0	0	0	0	36	26	42	0	42
2009	358	1,387	42	445	12	0	0	0	129	28	114	0	114
2010	483	1,453	136	315	0	0	61	0	133	55	114	0	101
2011	191	369	0	171	0	0	0	0	19	0	20	22	68
10 year ave.	453	1,194	99	380	17	24	18	14	87	32	80	2	80
5 year ave.	350	1,089	121	309	2	13	12	0	81	22	73	0	53

Kwethluk River Catch 2001-2011

	Anglers	Days fished	King	Coho	Sockeye	Pink	Chum	Lake trout	Dolly Varden	Rainbow trout	Grayling	Whitefish	Pike
2001	259	1,069	77	1608	37	0	425	0	142	896	3058	0	41
2002	223	920	195	310	67	0	455	181	2,223	3,398	3,000	0	350
2003	2,044	2,646	861	6,276	42	0	50	0	1,196	618	515	0	419
2004	1,467	2,021	778	3,608	218	0	308	60	2,376	1,027	697	15	1,603
2005	333	440	385	588	112	35	414	0	237	280	337	0	216
2006	396	1,216	493	2,626	0	95	918	0	365	5,990	2,701	0	152
2007	272	297	733	1,225	25	23	21	0	1,586	3,277	3,440	76	143
2008	239	1,092	845	1,027	188	0	961	0	1,874	6,688	2,828	0	33
2009	358	1,387	42	445	12	0	0	0	129	28	114	13	0
2010	483	1,453	584	348	0	0	524	0	2,174	4,037	3,355	59	261
2011	191	369	153	540	0	21	804	0	193	362	214	22	129
10 year ave.	607	1,254	499	1,806	70	15	408	24	1,230	2,624	2,005	16	322
5 year ave.	350	1,089	539	1,134	45	24	485	0	1,226	4,004	2,488	30	118

Beverly Hoffmans letter of recruitment for the Upriver Elder seat.:

Kuskokwim River Salmon Management Working Group

P.O. BOX 1467 • BETHEL, AK 99559 • 907-543-2433 • 907-543-2021 FAX

Dear

The Kuskokwim Salmon Management Working Group needs to fill the Upriver Elder seat left vacant when we lost the late Iyana Gusty. We would like your community to appoint an elder who will work with other stakeholders on issues and management of our Kuskokwim Salmon.

This individual will need to attend Working Group inseason meetings via teleconference and at least once a year in person. It would be good if the tribal organization can be responsible for receiving the agenda packets prior to each meeting and making sure the upper river elder has a place to use a telephone to call in. All calls are toll-free.

We are anxious to have someone in this seat. Please contact any of the chairs regarding this matter. I have listed all the Working Group members who volunteer their time to work on the issues and management of all Kuskokwim Salmon Species. Qu yana for your help in filling this seat.

Sincerely,

Beverly A. Hoffman, Co-Chair

USF&WS Letter to the Board of Fish (October 5, 2012): *A similar request was submitted by AVCP on September 26, 2012 (see September 27 Meeting summary). The data requested were provided to both USF&WS and AVCP on October 17, 2012.*



IN REPLY REFER TO:

FWS/OSM 12073.PP

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road

Anchorage, Alaska 99503-6199



OCT 05 2012

Mr. Karl Johnstone, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Preliminary response to the Alaska Department of Fish and Game (ADF&G) memo to the Board of Fisheries (Board) regarding revisions of the Kuskokwim River Chinook salmon escapement goals, dated September 19th, 2012.

Dear Mr. Johnstone:

The purpose of this letter is to clarify U.S. Fish and Wildlife Service (FWS) involvement in the process used to develop the proposed revisions to SEGs for Chinook salmon on the Kuskokwim River, and to provide our preliminary position on the proposed escapement objectives. In the 2005 Memorandum of Understanding (MOU) between the State of Alaska and Federal Agencies, (enclosed) all parties agreed to review and develop scientifically-based salmon escapement goals and further, that a review team would conduct appropriate analyses and make recommendations for changing escapement objectives. Additionally, the MOU states that team members may include staff from Federal agencies in cases where federal subsistence management jurisdiction applies.

FWS staff participated in some of the initial team discussions and was provided preliminary data, including a “traditional” Ricker production model for Kuskokwim Chinook. After initial review, FWS staff offered general recommendations addressing FWS conservation mandates and concerns. In September 2012, ADF&G staff used a Bayesian state-space production model based on the Ricker model to develop recommendations for SEGs. While results were presented to FWS staff, the model itself, associated data sets, and underlying assumptions have not been provided to FWS for their review.

Unlike the “traditional” Ricker model provided to FWS as part of the preliminary analyses, the Bayesian state-space production model can account for both measurement and process error and also provides a platform for testing various assumptions and parameter values used in generating results. While the FWS supports the use of improved models to estimate salmon escapement goals, we are unable to evaluate or support the proposed SEG based on this model until further analyses have been conducted either jointly with the State or independently by FWS staff. These analyses should include an evaluation of other factors that may be influencing model performance, such as sex ratios skewed toward males, declines in older age classes, size



Mr. Karl Johnstone

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selectivity by the subsistence fishery, and the influence of ocean conditions on productivity, as well as a thorough review of the methodology, supporting datasets, and assumption.

The proposed changes to the escapement objectives for Chinook salmon on the Kuskokwim are significant, and will have far reaching effects on future State and Federal management decisions and strategies concerning this resource. Significant concerns and the desire to better understand the proposed SEGs have already been raised by key stakeholders. However, the model, data, and assumptions used do not appear to have been rigorously evaluated. We look forward to receiving the necessary information from ADF&G to allow for either an independent or joint analyses of these recommendations. Until further analyses have been completed, the FWS cannot, at this time, support modifications to Chinook salmon escapement goals for the Kuskokwim River as proposed by ADF&G staff. Our goal would be to complete our analyses and report back to the Board and ADF&G prior to your January 2013 meeting addressing the AYK Region.

Thank you for the opportunity to comment.

Sincerely,



Pete Probasco
Assistant Regional Director
Office of Subsistence Management

Enclosure

cc: Jeff Regnart, Director Division of Commercial Fisheries
Jennifer Yuhas, ADF&G
LaVerne Smith, Acting Regional Director, USFWS
Tim Towarak, Chair, Federal Subsistence Board
Gene Peltola Jr., Refuge Manager, Yukon Delta NWR
Mike Boylan, Refuge Supervisor, Alaska Region
Polly Wheeler, Deputy Chief of Refuges, Alaska Region