

COMMENTS TO THE ALASKA BOARD OF FISHERIES

The Yukon Flats Fish and Game Advisory Committee offers the following comments to the Board of Fisheries in response to Fisheries Proposal 154. The YFAC unanimously supports this proposal.

RATIONALE:

The Yukon River Chinook salmon stocks are currently classified as a yield concern. Subsistence harvest levels have not reached the amounts reasonably necessary for subsistence (ANS) the last five years 2008—2012. The 2012 run of Chinook salmon experienced the fifth consecutive season of below average to poor salmon production with low returns despite typically adequate parent year escapement levels. The residents of the Yukon Flats depend on subsistence hunting and fishing for their nutritional and cultural survival.

The Salmon Fork of Black River in the northeastern portion of the Yukon River drainage supports spawning populations of three species of salmon. Field surveys and telemetry data in this stream for Chinook are recent and do not afford a picture of abundance over time. According to Traditional Ecological Knowledge (TEK), however, abundance significantly decreased following extensive overfishing in the mid twentieth century, and has been slowly rebuilding ever since. The single community located on Black River, Chalkyitsik, has voluntarily suspended its subsistence fishery of Chinook in order to allow the population to recover.

While the productivity of the Salmon Fork contributes to the overall population structure of the Yukon River Chinook run, based on the principles of landscape genetics it is likely that this is a genetically distinct stock. The upper reaches of different river systems, like Salmon Fork, can be in the same ecological zone as other headwaters streams, but the salmon in them are geographically isolated from each other. Isolated stocks have unique adaptations that are genetically encoded, providing the basis of current and future salmon production. **Maintenance of genetic diversity is very important to the future of salmon because of the impacts that climate change is expected to have in the north.**

An actual population estimate for Salmon Fork is not available from the literature, nor are Federal or State fisheries biologists willing to commit to a number. Based on telemetry data alone, one USFS fisheries biologist agreed that 500 may be a reasonable estimate of the total number of returning spawners in the Salmon Fork, a critical number for a discrete population. According to TEK, spawning activity occurs along the entire length of the Salmon Fork. Telemetry data show spawning activity concentrated upstream of the international border. As well as providing spawning habitat, Salmon Fork is a migration corridor for anadromous fish stocks returning to spawn in Canada. This stock of Yukon Chinook salmon therefore may be subject to international treaty obligations.

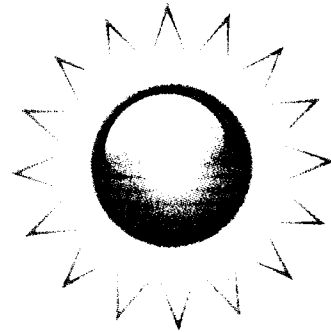
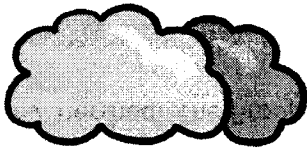
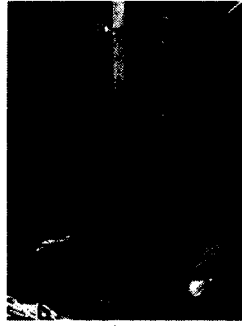
Starting in the early 1980's commercial operations began offering float, hunting, and fishing trips on the Salmon Fork. In 1991 BLM determined that at least three guides and one outfitter were offering float trips. July was advertised as "the best time" to enjoy these trips, since "king salmon are in the river and



you can fish for them". In a 1994 interview with Fish and Wildlife Service personnel, guide Sandy Jamieson said that he flies his clients to the International Boundary. They then float down the Salmon Fork to its mouth, where he meets them with his plane. Approximately three float trips are made each year. Sport fishing for king salmon is one of the attractions of these trips.

The Yukon Flats Advisory Committee (YFAC) addressed this issue in its November 15, 2011, meeting. In order to protect Chinook salmon on the spawning grounds, a motion was made to submit a proposal to close Black River to sport fishing for Chinooks. The motion passed unanimously.

The Black River Working Group is made up of local subsistence users, tribal members, local residents, environmental organizations, and tribal governments, concerned with management issues affecting the Black River watershed. The Group concurs with the YFAC and unanimously supports the proposed regulation.



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