

RC 030

December 10, 2013

Dear Mr. Johnstone, Chairman Alaska Board of Fisheries:

Re: response to Department of Fish and Game comments regarding the petition to allow purse seines to commercially harvest Yukon River summer chum salmon.

While we appreciate the Departments comments regarding the emergency petition submitted with regard to the request to authorize use of purse seines for commercial harvest of Yukon River summer chum salmon in districts 1-3 during times of king conservation, we still maintain an emergency exists because of several reasons that were not addressed by the Department in their comments.

These are:

- Summer chum salmon runs have been increasing in number since 2009. I expect the 2014 run to be similar to the 2013 run of approximately 3.2M salmon. Accordingly, available commercial harvests have also been increasing. I also suspect that there will be 2.0M or more salmon available for harvest in 2014. Note that the Department states that the foregone harvest was approximately one million salmon in 2013. This foregone harvest level only pertains to Districts 1 and 2. The total drainage-wide foregone harvest was at least 1.6M summer chum salmon. Total drainage-wide escapement was in excess of 2.6M salmon.
- Continued excess escapement above the replacement point of 2.0M salmon will most likely jeopardize future yields, starting with the 2015 run, possibly to the point where commercially-available surplus are substantially reduced or eliminated.
- Continued decline of the Yukon king salmon runs will most likely further curtail or eliminate the non-selective summer chum salmon directed commercial gillnet fisheries in order to reduce the incidental harvest of king salmon. We urgently need additional selective harvest gear types that have the potential to harvest large numbers of the target species while allowing the live release of the king salmon. Dipnets will not substitute for the significantly more efficient gillnet gear.
- The unforeseen precluded use of beach seines because of the normally high water levels during the summer fishing season eliminated a potential large harvest from the use of this gear type. We suspect that few, if any, beach seines sites will be available during most fishing seasons because of the normally high water.
- The Department overstated the success of the dipnet fishery. Dipnets are an extremely inefficient method of capturing salmon. Additionally, participation rates were low and probably will continue to remain low because of the inefficiency of the gear.

I sincerely hope this RC helps to clarify the situation on the Yukon River. Please don't hesitate to ask me any questions that you may have.

Sincerely,


FOR YDFDA