



Association of Village Council Presidents

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**AVCP RECOMMENDATIONS FOR THE YUKON and
KUSKOKWIM RIVER PROPOSALS
2013 ALASKA BOARD OF FISHERIES MEETING**

January 15-20, 2013

Sheraton Hotel

Anchorage, Alaska

Yukon River Proposals

Prop. #	Proposed Language/Change	Impact	AVCP Position
130 ADF&G	Review the Amounts Necessary for Subsistence (ANS) for Yukon River Salmon: King Salmon 45,500 – 66,704 Summer Chum Salmon 83,500 – 142,192 Fall Chum Salmon 89,500 – 167,900 Coho Salmon 20,500 – 51,890	This proposal would benefit the subsistence user in identifying and documenting the ANS for Yukon River Salmon. The numbers reflected do not take into consideration the most recent downturn in the productivity of the Yukon River Chinook Salmon and increased reliance on chum salmon.	Support No. BOF 2012-08 Option B.
131 YRDFA/ Stakeholders	Require pulse protection for the Yukon River Chinook Salmon primarily early in the season.	This proposal would require the Alaska Department of Fish & Game to close all subsistence fisheries early in the season to primarily protect the first pulse and all subsequent pulses to ensure treaty obligations into Canada.	Support with modification-AVCP does not support the continued prohibition of subsistence/commercial harvest of the first pulse, but is willing to support this proposal during low productivity years.
132 FAC	Prohibit the sale of Chinook salmon unless a Chinook salmon directed commercial fishery occurs.	This regulation would prohibit the sale of Chinook salmon even during the years when Chinook salmon population return to healthy runs. If the department were to announce a restricted opening, commercial fishermen would be restricted from selling Chinook salmon incidentally harvested in a restricted opening.	Oppose or could support with modification. Modification would include "only in years of low productivity of Chinook salmon."
133 Gene S.	A maximum of 5.5 inch or smaller and a maximum of 30 meshes deep for commercial fisheries during years of low Chinook salmon abundance.	This proposal would place an undue burden upon the subsistence/commercial fisherman on the Yukon River. It would result in an incredible cost to the fisherman especially during this time of decreased economic activity due to the low	Oppose

		abundance of Chinook salmon.	
134 Frank A.	This proposal would limit the current six-inch gear to a maximum of 30 meshes deep.	Similar to proposal 133, this proposal would place an undue burden upon the subsistence/commercial fishermen.	Oppose
135 Gene S.	Require that a commercial fishery for summer chum salmon begins on July 1 during times when Chinook conservation concerns are present.	This proposal would allow the commercial harvest of the more abundant summer chums and would provide commercial permit holders with the opportunity to begin a commercial fishery when most of the Canadian-bound Chinook salmon have migrated out of the Lower Yukon River.	Support
136 Ruby AC	Cap the incidental harvest of Chinook salmon in a summer chum directed commercial fishery to 2,000.	This proposal would force a closure of the summer chum directed fishery when an incidental harvest limit of 2,000 Chinook salmon is achieved. This would severely limit the commercial harvest of the more abundant summer chum salmon leading to continued low returns of summer chum salmon as well.	Oppose
137 Gene S.	Provide for a scientifically defensible total river biological escapement goal for summer chum salmon above the Pilot Station Sonar.	This proposal would allow for a targeted escapement goal above Pilot Station for summer chum salmon. Current information provided by the proponent suggests that 850,000 summer chum salmon passage is needed to provide for escapement and up-river subsistence needs. Anything above this benchmark would allow for commercial fisheries to occur.	Support
138 Gene S.	Reduce the trigger point from 500,000 to 400,000 fall chum to provide for commercial fisheries to occur at a lower point.	This proposal would lower the in-river escapement goal to provide for commercial fisheries to occur earlier outside of the current fall chum management plan. The proponent points out concerns of under-estimation at the Pilot Station Sonar from 2008 to 2011.	Oppose

139 ADF&G	Align subsistence salmon fishing regulations with current management practices by including emergency orders and subsistence salmon fishing during a commercial opening by emergency order.	"Section C" of this proposal may have an undesirable effect on our subsistence fishermen, especially during the summer season, when commercial fishermen whom are subsistence fishermen wants to fish to fill the racks.	Support with the exception of "Section C."
140 FAC	This proposal seeks to force the Alaska Department of Fish & Game to adhere to windows regulation for the management of the Chinook salmon fishery during the summer.	This would take away an essential management tool away from managers to provide flexibility when Chinook salmon returns are beyond escapement needs.	Oppose
141 EIRAC	Allow for concurrent subsistence/commercial openings in all of the Yukon River salmon districts.	This person would provide a person with a choice of either commercial or subsistence fishing during a commercial opening. The potential impact it may have on a subsistence fisherman would not be desirable.	Oppose
142 YFAC	All no subsistence fishery closures from July 4-18 in Sub-district 5D below Steven's Village to Circle.	This sub-district would be the only area allowed to fish the first pulse while everyone else is CLOSED!	Oppose
143 Gene S.	Initiate the two-36 hour fishing periods windows regulation for the summer chum season only.	This would provide the salmon managers with more flexibility to manage the commercial fisheries in the fall with commercial nature of the lower Yukon fall chum salmon fishery.	Support
144 FAC	Provide for a maximum gillnet depth of 35 meshes deep or 15 feet.	The proposal would place undue economic hardship on both subsistence and commercial salmon fishermen.	Oppose
145 Eagle AC	Same as above	Same as above	Oppose
146 FAC	No more than 6" mesh shall be allowed on the entire Yukon River.	Debilitating and undue hardship on both subsistence and commercial fishermen	Oppose
147 Ruby AC	Allow drift nets in 4A to Ruby, AK	This proposal could increase the harvest of Chinook salmon on the Yukon River	Oppose
148 Mid-YAC	Expand the use of drift nets to Yukon River in Y-4	Same concerns as the previous proposal	Oppose

149 FAC	The creation of a subsistence harvest reporting system for Yukon River Chinook salmon	Unnecessary additional subsistence fishing regulation	Oppose
150 YRDFA SH	Same as above	Same as above	Oppose
151 Gene S.	Making the direct personal or family consumption of Yukon River Chinook salmon a primary subsistence use.	This proposal would make the primary reason for the subsistence harvest of Yukon River Chinook salmon is for direct personal or family consumption. Customary trade and other uses would be secondary.	Support
152 Gene S.	Open Acheron Channel to salmon fishing	Minimize the congestion of commercial fishermen in the south mouth of the Yukon River.	Support
153 ADF&G	Close sportfishing for salmon at Fielding Lake.	None	Support

154

Close Black River to sport fishing for Chinook Salmon None

Support

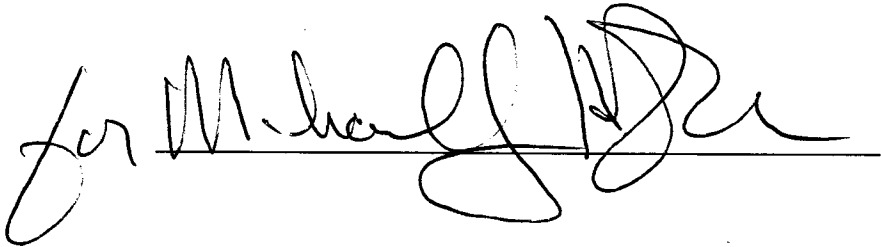
Kuskokwim River Proposals

Prop. #	Proposed Language/Change	Impact	AVCP Position
104	Review amounts reasonably necessary (ANS) for subsistence for salmon in the Kuskokwim River drainage.	The ANS for subsistence findings in regulation, which are critical for protecting subsistence opportunity, were set in 2001. ADFG has since reconstructed subsistence harvest estimates. In general, harvest estimates increased from what was previously estimated. In addition, the ranges were based on low and average harvest rather than low and high harvest as on the Yukon River.	Support revising ANS for the Kuskokwim using the entire dataset of reconstructed harvest estimates. The ANS range should exclude years with subsistence restrictions and be based on the low and high harvest years.
105	Update and clarify <i>Kuskokwim River Salmon Rebuilding Management Plan</i> and strategies	The Management plan must be updated to reflect current practices and issues. In addition an alternative to proposal 105 was developed with input from USFWS and stakeholder representatives.	Support alternative to proposal 105, the management plan developed with stakeholder input. This would be a first step, with the ultimate goal of developing a management plan with input from all communities.
106	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.	The proposed escapement goal and management changes represent drastic changes to the Kuskokwim River. Any changes made to the Kuskokwim, which supports the subsistence harvest in the State of Alaska should be done only if the implications and the risk of making these changes have been fully evaluated. The ADFG proposed drainage-wide goal needs further analysis and validation before adopting.	Do not adopt a drainage-wide goal until the run reconstruction "scaler" is recalibrated by a repeat tagging study, the results of recent low abundance years is observed, direct evidence that overcompensation is occurring is observed, and social/allocation impacts of adopting a drainage-wide goal are evaluated.

109	Allow for sale of subsistence-taken finfish in the Kuskokwim River Area	The Kuskokwim is in a time of critical king salmon shortage. In this time of low abundance, we should not create new regulations to allow for the sale of subsistence finfish.	Do not support.
111	Close all sport fishing on the Eek River	The village of Eek has a long standing law passed down from our Elders not to play with our food.	Support. Conflicts with traditional values.
112	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.	The Kwethluk River has been experiencing poor king salmon returns. Main-stem closures negatively affect all subsistence users.	Support this time and area closure to protect king salmon returning to the Kwethluk River in times of low returns.
113	Prohibit catch and release fishing for salmon on the Kanektok River and the Arolik River.	Conflicts with long standing law passed down from our Elders not to play with our food.	Support. Conflicts with traditional values.
114	Prohibit sport fishing on all salmon spawning beds on the Kanektok and Arolik River drainages.	Conflicts with long standing law passed down from our Elders not to play with our food.	Support. Conflicts with traditional values.
107	Allow subsistence taking of 10 or more king salmon only for drying and cold-smoke use in the Kuskokwim River Area.	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").	Support the intent to protect the opportunity to harvest king salmon for traditional drying use during the ideal drying weather conditions.

108	Require a permit and reporting requirement for all subsistence-caught salmon transported out of the Kuskokwim Management Area	The Kuskokwim has been facing king salmon shortages. The amount of king salmon exported out of the region is unknown but thought to be unacceptably high.	Support. This proposal is necessary to understand the amount of salmon leaving the management area.
110	Remove the option for gillnet mesh to be up to 8 inch in District 1 of the Kuskokwim River Area.		No position at this time.

Approved: Myron P. Naneng Sr., President

for 

Date

1/14/13