# STAFF ANALYSIS TEMPORARY SPECIAL ACTION REQUEST FSA24-01

#### **ISSUES**

Fisheries Special Action Request FSA24-01, submitted by the Yukon River Intertribal Fish Commission, requests the Federal Subsistence Board (Board) close Federal public waters of the Yukon River drainage in 2024 to the harvest of Chinook, summer Chum, fall Chum, and Coho salmon, except by federally qualified subsistence users and require that the Federal fisheries manager determine Federal subsistence fishing schedules, openings, closures, and fishing methods within Federal public waters.

#### DISCUSSION

The impetus for the proponent submitting this Special Action Request is the decreasing Chinook Salmon run sizes that began in 2000 and the multi-species crash in 2020, resulting in long closures to the harvest of salmon on Federal public waters by federally qualified subsistence users in 2022 and 2023. In 2023, the Federal in-season manager was able to provide some opportunities for subsistence users to harvest salmon in Federal waters, and the State manager implemented simultaneous harvest opportunity for salmon in non-Federal public waters for all State residents. The Yukon River Intertribal Fish Commission's primary concern is: (1) in 2023 State managers, and not the Federal manager, closed the drainage to fishing and (2) Federal opportunities for harvesting were simply mirroring state openings, without justification. These issues are why the Commission has asked the Board to preemptively close Federal public waters in the drainage to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users and additionally the Board should instruct the Federal manager to justify in writing how each harvest opportunity is upholding the provisions of ANILCA (Ulvi 2024, pers. comm.).

The proponent's issues are further described in its special action request to the Board cited below:

Yukon River Chinook, summer chum and fall chum and coho salmon populations have steeply declined resulting in a failure to meet Yukon River escapement goals for Chinook salmon, summer chum and fall chum in US waters in recent years including 2021–23. In addition, there has been a failure to meet US/CAN international salmon treaty obligations for fall Chum Salmon and Chinook Salmon in recent years. Due to this unprecedented multi-species salmon crash, no harvestable surplus was available to our subsistence communities during the 2021 and 2022 seasons. The very limited harvest opportunities provided in 2023 failed to meet our subsistence salmon needs.

Clearly, federal management under the provisions of ANILCA is justified. Based on an OSM Staff Analysis and the support of the Western Interior Alaska, Seward Peninsula,

and Eastern Subsistence Regional Advisory Councils, the Federal Subsistence Board voted on May 4, 2022, to unanimously support FSA22-01/02/03/04 as modified by the Western Interior Alaska, Seward Peninsula, and Eastern Interior Alaska to include Coho Salmon in the closure [in addition to Chinook, summer Chum, and fall Chum salmon].

Since this unanimous vote by the Federal Subsistence Board in May 2022 to assume fisheries management on federal waters of the Yukon River, there has been no significant improvement in the stock status of these Yukon River salmon populations. Based on preseason forecasts and recent year's run strength, there is no compelling data indicating that the 2024 Chinook and summer and fall chum salmon runs will be adequate to provide a harvestable surplus sufficient to meet customary and traditional harvest needs of federally qualified subsistence users in the watershed.

Any federal management actions to open or close subsistence fishing in federal waters of the Yukon River must uphold the provisions of ANILCA and uphold the US/CAN Yukon River Salmon Agreement. Therefore, we are very concerned with the precedent set in 2023, wherein the actions of the federally designated inseason manager were solely reactive to management actions by the State of Alaska, an entity who as a matter of state constitutional law, cannot provide a rural subsistence priority.

Preemptive closure of federal waters to non-Federally qualified users and uses, and assumption of federal management is both warranted and required as necessary for the conservation of declined populations of Yukon River salmon while providing reasonable and sustainable subsistence harvests based on ANILCA Section 815. Additional openings and closures of subsistence fisheries in federal waters by the federal inseason manager via delegated authority from the Federal Subsistence Board, must be justifiable under the provisions of ANILCA, rather than merely mirroring actions taken by the State of Alaska.

#### **Existing Federal Regulation**

#### 50 CFR 100.27(e)(3) Subsistence taking of fish—Yukon-Northern Area

(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060 [Emergency Orders]), unless superseded by a Federal Special Action.

#### **Relevant Federal Regulations**

#### 50 CFR 100.14 Relationship to State procedures and regulations.

(b) The Board may close public lands to hunting, trapping, or fishing, or take actions to restrict the taking of fish and wildlife when necessary to conserve healthy populations of fish and wildlife, continue subsistence uses of such populations, or pursuant to other applicable Federal law. The

Board may review and adopt State openings, closures, or restrictions which serve to achieve the objectives of the regulations in this part.

### **Proposed Federal Regulation**

### 50 CFR 100.27(e)(3) Subsistence taking of fish—Yukon-Northern Area

(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060 [Emergency Orders]), unless superseded by a Federal Special Action.

Federal public waters of the Yukon River drainage are closed to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users, effective on June 1, 2024, through September 30, 2024. Federal subsistence fishing schedules, openings, closures, and fishing methods will be determined by the Federal Fisheries Manager.

### **Existing State Regulation**

## Yukon Area—Subsistence

## 5 AAC 01.210. Fishing seasons and periods

(a) Unless restricted in this section, or in 5 AAC 01.220 - 5 AAC 01.249, salmon may be taken in the Yukon Area at any time.

(b) When there are no commercial salmon fishing periods, the subsistence fishery in the Yukon River drainage will be based on a schedule implemented chronologically, consistent with migratory timing as the salmon run progresses upstream. The commissioner may alter fishing periods by emergency order, if the commissioner determines that preseason or inseason run indicators indicate it is necessary for conservation purposes. The fishing periods for subsistence salmon fishing in the Yukon River drainage will be established by emergency order as follows:

(1) Coastal District, Koyukuk River, Kantishna River, and Subdistrict 5-D: seven days per week;

(2) Districts 1 - 3: two 36-hour fishing periods per week;

(3) District 4, and Subdistricts 5-A, 5-B, and 5-C: two 48-hour fishing periods per week, except that in Subdistricts 5-A, 5-B, and 5-C, when the department's inseason projection of the fall chum salmon run is greater than or equal to 700,000 fish based on the summer to fall chum salmon historic relationship, the fishing schedule will be seven days per week coinciding with the migratory timing of the fall chum salmon run;

(4) District 6: two 42-hour fishing periods per week; and

(5) Old Minto Area: five days per week.

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#### Yukon Area—Commercial

#### 5 AAC 05.310. Fishing seasons

Except as provided in 5 AAC 05.320 - 5 AAC 05.380, salmon may be taken only as follows:

(1) in Districts 1, 2, and 3, the commissioner shall open and close the season by emergency order;

(2) in District 4, the commissioner shall open and close the season by emergency order;

(3) in District 5, in all subdistricts, the commissioner shall open and close the season by emergency order;

(4) in District 6, the commissioner shall open the season by emergency order and close the season by emergency order.

### 5 AAC 05.320. Fishing periods

In the Yukon Area, in all districts and subdistricts, salmon may be taken only during fishing periods established by emergency order.

### **Extent of Federal Public Waters**

For purposes of this discussion, the phrase "Federal public waters" is defined as those waters described under 50 CFR 100.3. Federal public waters described in this special action request consist of all navigable and non-navigable freshwaters of the Yukon River drainage (an area consisting of all waters flowing into the Bering Sea from the northwestern most point of Point Romanof extending south and west along the coast of the Yukon delta to the westernmost point of the Naskonat Peninsula) that are within and adjacent to the exterior boundaries of the following Federal conservation units:

- Arctic, Innoko, Kanuti, Koyukuk, Nowitna, Tetlin, Yukon Delta, and Yukon Flats National Wildlife Refuges
- Yukon-Charley Rivers National Preserve, Gates of the Arctic National Park and Preserve, Wrangell St. Elias National Park and Preserve, and Denali National Preserve and the 1980 additions to Denali National Park
- Steese National Conservation Area
- White Mountains National Recreation Area

Federal public waters also include the National Wild and Scenic Rivers of Beaver Creek, Birch Creek, Delta River, and Fortymile River (Figure 1).

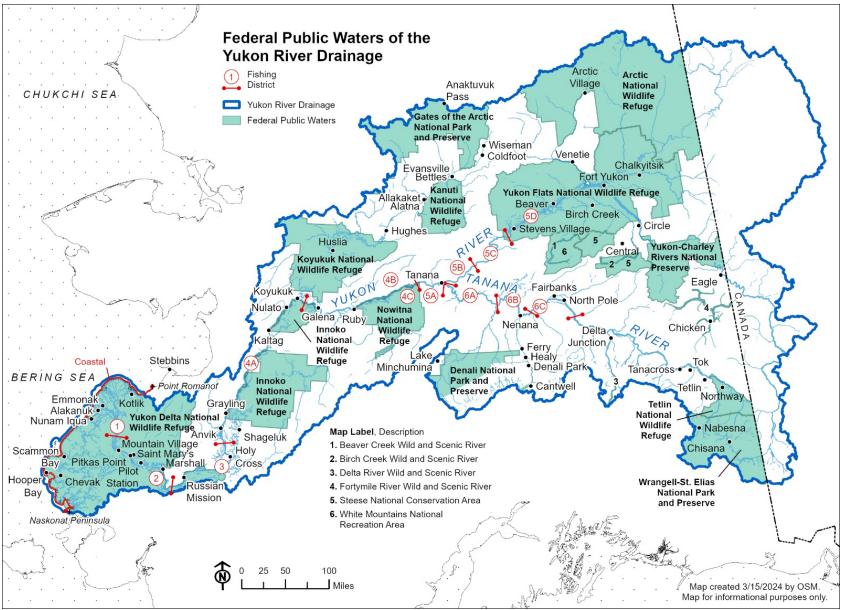


Figure 1. Map of Federal public lands and waters in the Yukon River drainage.

#### **Customary and Traditional Use Determination**

Rural residents of the Yukon River drainage including residents of the coastal villages of Chevak, Hooper Bay, Scammon Bay, and Stebbins have a customary and traditional use determination for salmon in the Yukon River drainage and are therefore eligible to harvest salmon under Federal subsistence regulations.

### **Cultural Knowledge and Traditional Practices**

Over the past 60 years, the Yukon River drainage has experienced varying levels of demographic, social, and economic changes. The villages are situated on the traditional lands of Yup'ik and Deg Hit'an, Doy Hit'an, Holikachuk, Denaakk'e (Koyukon), Gwich'in, Han, and Tanana Athabascans, and most people identify with one or more of these cultural groups. People were once mobile, following seasonal availability of resources. By the 1960s, most people had shifted from nomadism to permanent settlements where they could access both modern institutions, such as trading posts and schools, and traditionally important harvesting sites. In the upper river area, large numbers of migratory caribou were once available from the Porcupine and Fortymile caribou herds, but the collapse of the Fortymile caribou herd between 1950 and 1970 had an enormous effect on the ability of many villages to harvest caribou and the loss of a significant resource available in the area. By the 1970s, most people had shifted away from relying on teams of sled dogs, often fed salmon, to relying on snowmobiles for transportation instead; although, many dogs are still kept. Other people from outside the area immigrated to the area for work, education, government, mining, and trade (Clark 1981, Crow and Obley 1981, Hosley 1981, Slobodin 1981, VanStone and Goddard 1981, Nelson 1983, Fienup-Riordan 1984, 1986, VanStone 1984, Mishler and Simeone 2004, Haynes and Simeone 2007, Andersen and Scott 2010, Wolfe and Scott 2010, Van Lanen et al. 2012).

Forty-eight villages in the Yukon River drainage rely on Yukon River salmon as a primary subsistence resource (ADF&G 2024a; **Table 1**). This includes only four communities in the Tanana River drainage that are nearest to its confluence with the Yukon River. Few salmon are observed further up the Tanana River (Estensen 2013, Trainor et al. 2021).

These villages that rely on Yukon River drainage salmon have been adapting to reductions in salmon fishing opportunity over several decades. However, Federal fishery disasters have been declared for Yukon salmon every year since 2019. Additionally, a Federal disaster declaration was issued for the spring flooding along the Yukon that occurred in May 2023 when many fish camps were flooded and smokehouses and fish racks were damaged or destroyed (Rogerson 2023, ADF&G 2024b). Few opportunities to subsistence fish for salmon have been allowed and commercial fisheries have been closed. These recent salmon run crashes and associated restrictions on harvests in subsistence and commercial fisheries negatively impacted people who live up and down the Yukon River in new and significant ways.

**Table 1**. The estimated population of villages that rely on Yukon River drainage salmon, by community and fishery management district, 1960–2020, based on the U.S. Census (CDP=Census Designated Place, blank cell=information not available, source: ADCCED 2022).

Community	1960	1970	1980	1990	2000	2010	202
Scammon Bay city	115	166	250	343	465	474	60
Hooper Bay city	460	490	627	845	1,014	1,093	1,37
Chevak city	315	387	466	598	765	938	95
Coastal District subtotal	890	1043	1343	1786	2244	2505	292
Alakanuk city	278	265	522	544	652	677	75
Nunam Iqua city	125	125	103	109	164	187	21
Emmonak city	358	439	567	642	767	762	82
Kotlik city	57	228	293	461	591	577	65
District 1 subtotal	818	1057	1485	1756	2174	2203	245
Mountain Village city	300	419	583	674	755	813	62
Pitkas Point CDP	28	70	88	135	125	109	12
Saint Marys city	260	384	382	441	500	507	59
Pilot Station city	219	290	325	463	550	568	61
Marshall city	166	175	262	273	349	414	49
District 2 subtotal	973	1338	1640	1986	2279	2411	244
Russian Mission city	102	146	169	246	296	312	42
Holy Cross city	256	199	241	277	227	178	17
Shageluk city	155	167	131	139	129	83	10
District 3 subtotal	513	512	541	662	652	573	69
ower River subtotal	3,194	3,950	5,009	6,190	7,349	7,692	8,52
Anvik city	120	83	114	82	104	85	7
Grayling city	0	139	209	208	194	194	21
Kaltag city	165	206	247	240	230	190	15
Nulato CDP	183	308	350	359	336	264	23
Koyukuk city	128	124	98	126	101	96	9
luslia city	168	159	188	207	293	275	30
lughes city	69	85	73	54	78	77	8
Allakaket city	115	174	163	170	97	105	17
Alatna CDP				31	35	37	1
Bettles city	77	57	49	36	43	12	2
Evansville CDP	77	57	45	33	28	15	1
Viseman CDP	0	0	8	33	21	14	
Coldfoot CDP					13	10	3
Galena city	261	302	765	833	675	470	47
Ruby city	179	145	197	170	188	166	13
District 4 subtotal	1,542	1,839	2,506	2,582	2,436	2,010	2,04
anana city	349	120	388	345	308	246	24
Rampart CDP	49	36	50	68	45	24	5
Stevens Village CDP	102	74	96	102	87	78	3
Beaver CDP	101	101	66	103	84	84	4
ort Yukon city	701	448	619	580	595	583	42
Chalkyitsik CDP	57	130	100	90	83	69	5
Arctic Village CDP	110	85	111	96	152	152	15
/enetie CDP	107	112	132	182	202	166	20
Birch Creek CDP	32	45	32	42	28	33	3
Circle CDP	41	54	81	73	100	104	9

Community	1960	1970	1980	1990	2000	2010	2020
Chicken CDP	0	0	0	0	17	7	12
Central CDP	28	26	36	52	134	96	66
Eagle Village CDP	0	0	54	35	68	67	53
Eagle city	92	36	110	168	129	86	83
District 5 subtotal	1,769	1,267	1,875	1,936	2,032	1,795	1,568
Manley CDP	72	34	61	96	72	89	169
Minto CDP	161	168	153	218	258	210	150
Nenana city	286	362	470	393	402	378	358
Healy CDP	67	79	334	487	1,000	1,021	966
District 6 subtotal	586	643	1,018	1,194	1,732	1,698	1,643
Upper River subtotal	3,897	3,749	5,399	5,712	6,200	5,503	5,252
Total	7,091	7,699	10,408	11,902	13,549	13,195	13,775

The overall population of these 48 villages has almost doubled in the 60 years between 1960 and 2020. In 2020, an estimated 13,195 people resided in these villages. However, fewer people are living in the middle and upper Yukon River now compared to 2000. The population of the middle river declined 16% (in Fisheries Management District 4), and in the upper river by 15% (in District 5). At the same time, the population of the lower river where most villages enjoy a broader, more abundant resource base increased 16% (in Districts 1, 2, 3) (Brown and Godduhn 2015, ADCCED 2024).

These population trends, described above, have coincided with decreased income from salmon commercial fisheries in the Yukon River area. In 2001, some salmon run-size forecasts were so low that for the first time State managers did not open commercial fisheries (66 FR 55093, November 1, 2001). This year marked a dramatic shift in management of salmon commercial fisheries drainage-wide. Since 2000, commercial fisheries have operated under new biological and regulatory regimes producing less income overall in the villages. Between the period 1975 to 2000 and 2001 to 2022, average annual earnings, not adjusted for inflation, have declined 65% in the lower Yukon gillnet fishery; 97% in the upper Yukon gillnet fishery; and 85% in the upper Yukon fish wheel fishery. All villages have been affected to greater or lesser extent. Villagers with other economic opportunities beyond commercial fishing might be less likely to leave permanently, but availability of wild resources among many other various factors contributes to this decision. The reduction in commercial opportunity has been implemented in part to support the subsistence fishery (Brown and Godduhn 2015, ACFEC 2024).

All of the villages have mixed subsistence-cash economies and have been directly impacted by salmon commercial fishery closures (Wolf and Ellana 1983). When commercial fishing is not possible, villages have difficulty obtaining gear and gasoline necessary for subsistence fishing and hunting, paying power bills, or buying food, thereby worsening possible food insecurity created by crashing salmon runs. Subsistence harvests had been less affected by declining salmon runs until 2020, and since then very little subsistence harvest has been allowed or possible. The effects of closed salmon commercial and subsistence fisheries have been somewhat lessened in the short run by disaster relief funds making it through to the villages, although many are still waiting on these funds (ADCRA 2024, USDOI 2024).

One of the most striking socioeconomic changes over the last 30 years in the villages has been the decline in the use of fish camps that is more prevalent in the middle river than in lower or upper river villages. Fish camp stays are harder to support and justify when commercial fishing is in decline. Increased restrictions during the summer season to protect a declining salmon runs, especially Chinook Salmon, forced residents to sit idle at camp while the fishery was closed. Many have abandoned camps to pursue productive work elsewhere (Brown and Godduhn 2015, YRDFA 2020, 2021, 2022, 2023).

Beyond impacts to local economies, in terms of both cash income and food insecurity, the salmon crashes have affected community members' sense of well-being and cultural meaning. The strong relationship between salmon and well-being of people is well documented. In the villages, everyone has intimate knowledge of salmon, and these salmon run crashes have affected everybody from elders to young children. People are shocked and alarmed by the salmon run crashes they are currently experiencing (Wolfe and Ellana 1983; Moncrieff et al. 2009; Moncrieff and Bue 2012; Riordan and Moncrieff 2017; Trainor et al. 2021; YRDFA 2020, 2021, 2022, 2023; Moncrieff *in pub*.)

For many indigenous cultures in the Yukon River drainage, traditional rules proscribe that when salmon present themselves, attempts should be taken to harvest them, or salmon might not return to be harvested in the following year or years because ignoring them is disrespectful to salmon (Riordan and Moncrieff 2017). A concern of some residents of the drainage is that while coordinating subsistence fishing opportunities with the State, the Federal in-season manager might allow an opportunity to harvest go by. Subsistence users want the Federal manager to provide opportunity to harvest salmon immediately and for as long as possible whenever a harvestable surplus is observed in run indicators. This is what they call the subsistence priority and adhering to traditional practices and knowledge (YRDFA 2020, 2021, 2022, 2023).

Cultural understandings of fairness proscribe that salmon commercial fisheries should remain closed to allow salmon migration upriver. This cultural understanding was not considered during some past years when commercial fisheries in the lower river operated and were seemingly given priority over subsistence fisheries in the upper river (YRDFA 2020, 2021, 2022, 2023).

Another cultural understanding regarding recent salmon run crashes is that off-shore fisheries operating in other areas of Alaska are destroying salmon they intercept. This destruction is disrespectful to salmon and affecting salmon's desire to return to the Yukon River, directly contributing to the salmon run crashes. Additionally, conflicts over management of fisheries creates a "noisy" environment that salmon do not respond well to, and this is also contributing to the salmon run crash on the Yukon River (Riordan and Moncrieff 2017). Many people in the villages believe that every Yukon salmon should be protected from harvest until it hits the Yukon River, and all user groups should be sitting on the beach and sacrificing regardless of profitability or size of harvest, because this is fair and benefits Yukon salmon runs. Currently, both Area M salmon commercial fisheries in the Alaska Peninsula area and off-shore commercial fisheries that intercept Yukon-bound salmon are being prioritized over subsistence uses of salmon in the Yukon River drainage, they said (YRDFA 2020, 2021, 2022, 2023).

### **Regulatory History**

#### Management and Assessment

Salmon management on the Yukon River is divided into two distinct seasons that generally coincide with the run timing and abundance of salmon species. During the summer season, which runs from early May through July 15 in District 1, management and assessment focus on Chinook and summer Chum salmon. Management transitions to the fall season beginning on July 16 in District 1 and assessment programs in the lower river shift to fall Chum and Coho salmon. Management in upriver districts transitions to the fall season based on the migration timing of fall Chum Salmon.

Management of Canadian-origin Yukon River salmon stocks is subject to conditions of the Yukon River Salmon Agreement. The agreement, which was signed in 2002, outlines the steps needed for the conservation and management of Canadian-origin Yukon River salmon. Under the agreement, interim management objectives (i.e., escapement goals for Canadian-origin Yukon River salmon) are reviewed and agreed upon annually prior to the start of the season by the Yukon River Panel. The Yukon River Panel is an international advisory body that implements the Yukon River Salmon Agreement. Recently, the interim management escapement goal (IMEG) into Canada has been 42,500–55,000 Chinook Salmon, 70,000–104,000 mainstem Yukon River fall Chum Salmon, and 22,000–49,000 Fishing Branch River fall Chum Salmon. The Yukon River Panel could not reach consensus on the IMEG for Chinook Salmon in 2023, so the goal was not renewed prior to the fishing season. Harvestable surpluses of the transboundary stocks must also be shared with Canada. Therefore, international treaty obligations must be considered while making in-season management decisions and providing harvest opportunities.

Prior to the fishing season, preseason forecasts are developed and used to shape management strategy. Federal and State managers work with the U.S./Canada Joint Technical Committee (JTC) to devise, review, and approve forecasts. Forecasts are then reviewed by the Yukon River Panel and made available to the public. The final forecasts provide the first indication regarding run strength and if restrictions will be needed to meet escapement goals. The Federal in-season manager uses these forecasts to develop a management strategy pre-season and shares this information via Government-to-Government Tribal Consultations as well as public hearings when special actions may be warranted in the coming season. Feedback from the consultations and public hearings is used to further refine the management strategy. The management strategy is broadly shared with the public pre-season via a News Release, Emergency Special action, and/or Temporary Special action notice.

Management is conservative during the early part of the fishing season until in-season data indicate harvestable surpluses are available. The Federal manager's in-season management decisions are informed by data collected at a variety of run assessment projects operated by the Alaska Department of Fish and Game. Test fisheries in District 1 of the lower river provide run timing, relative abundance, and age composition information (Estensen et al. 2018). The Pilot Station sonar, which is in District 2 of the lower river, provides fish passage and stock composition estimates for Chinook and summer and fall Chum salmon. Passage estimates are also provided for Coho Salmon at the Pilot Station sonar, but the counts are considered incomplete due to the late run timing of the species. Run sizes are projected as the runs

progress past the Pilot Station sonar (becoming more accurate midway through each run) and harvestable surpluses are determined for each species. If harvestable surpluses are expected, harvest opportunity is planned throughout the drainage. Run timing, known community and area harvest amounts, and other factors (e.g., preferred gear types, fish distribution and quality, and incidental harvest of other species) are considered when planning harvest opportunities. The Federal management team incorporates years of learning from traditional and local knowledge holders and input from fishermen and Tribal Governments regarding preferred fishing schedules, gears, and practices to the extent practicable when making management decisions.

The Eagle sonar, an upriver management tool, is located near the U.S. and Canadian border (upper Subdistrict 5-D) and is used to estimate Chinook and fall Chum salmon escapement into Canada and assess if treaty goals are met. This project does not provide useful information for in-season management in most districts because it is located upriver of the majority of U.S. fisheries. However, if the projected escapements from the Eagle sonar are lower than expected based on the Pilot Station sonar counts, harvest opportunity may be reduced in the upper part of District 5 to achieve treaty objectives and to ensure sufficient biological escapement to support future runs.

The management of Yukon River salmon harvest and escapement is complicated by projecting salmon runs in-season and discrepancies between sonar estimates. For example, in 2019 and 2020, the Pilot Station sonar projections of Canadian-origin Chinook Salmon indicated a harvestable surplus was available. However, the number of fish escaping to the border as identified by the Eagle sonar was significantly lower than projected at Pilot Station, which led to Alaska exceeding the U.S. harvest share and failing to meet the IMEG (JTC 2022). In 2021 through 2023, the discrepancy between sonar estimates persisted with the Pilot Station sonar projecting on average a 40% higher run abundance of Canadian-origin Chinook Salmon than what was observed at the Eagle sonar. The cause of the discrepancy is unknown but could result from assessment errors in passage estimation projects, harvest estimation projects, or in-river mortality of fish due to disease or environmental factors. Regardless of the cause, this discrepancy needs to be accounted for in future seasons when estimating run size abundance in-season.

Management of Yukon River salmon harvest and escapement is also complicated by mixed stock fisheries. For example, Canadian-origin Chum Salmon migration timing overlaps with U.S. stocks. However, the Canadian-origin Chum Salmon stock has been proportionally much weaker than U.S. stocks since the start of the fall Chum Salmon declines in 2020. Therefore, it may be difficult for managers to provide mainstem harvest opportunities for fall Chum Salmon even when escapement goals for U.S. stocks are projected to be met.

### Management Coordination

The Federal in-season manager for the Yukon River coordinates, to the extent possible, with State managers at the Alaska Department of Fish and Game to manage Yukon River salmon subsistence harvest opportunities as is required by the delegation of authority letter from the Board to the Federal in-season manager (**Appendix A**). Federal and State managers review all assessment data, forecasting tools, and in-season run projections. Management strategies, harvest opportunities, and management actions are

typically coordinated. This coordinated approach for management is necessary due to the mix of Federal and State waters throughout the drainage (**Figure 1**). While both entities have differing regulatory directives for managers to act on, coordinated management makes the distribution of fishery information, rationale for management actions, and explanations about the restrictions and opportunities consistent for all areas of the river to the benefit of users.

In 2023, Federal and State managers worked together for coordinated management. The State issued emergency orders closing sections of Yukon River drainage to the harvest of Chinook, Chum, and Coho salmon, including Federal public waters, while the Federal in-season manager issued special actions providing subsistence harvest opportunities in Federal public waters when a harvestable surplus was indicated by run assessment projects.

The managers were in contact with the goal of having simultaneous fishing opportunities on Federal- and State-managed waters. This allowed people fishing to place nets without having to know if they were on Federal- or State-managed waters, making it easier for managers to administer the fishery and for fishers to follow regulations.

## Federal Special Actions

As set forth in 50 CFR 100.27(e)(3)(ii), Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for subsistence taking of fish under Alaska Statutes (emergency orders), unless superseded by a Federal special action. The Federal Subsistence Board and Federal in-season managers have issued Yukon salmon special actions on several occasions since Federal subsistence fishery management went into effect in 1999. However, this analysis will focus on recent special actions.

# 2022 Salmon Season

In 2022, Fisheries Special Action Requests FSA22-01, 02, 03, and 04, submitted by a resident of Rampart, Holy Cross Tribe, Native Village of Eagle, and a resident of Huslia, requested that the Federal Subsistence Board close the Federal public waters of the Yukon River drainage to the harvest of Chinook and summer and fall Chum salmon except by federally qualified subsistence users from June 1 through September 30, 2022, and to reduce the pool of eligible harvesters based on an ANILCA Section 804 analysis. The Section 804 analysis recommended no reduction in the pool of eligible users. The Board approved Special Action Request FSA22-01 with modification to include Coho Salmon in the requested closure with the following justification:

The Board stated that Yukon River drainage salmon runs have recently been some of the worst on record, which resulted in closures and restrictions to salmon harvest the past four years. The 2022 run and harvest outlook is expected to be poor for all Yukon River salmon species and closures to the harvest of salmon by non-Federally qualified users on Federal public waters is necessary until in-season assessments may indicate otherwise. This action is necessary for the conservation of fish resources in Federal public waters. It also provides a priority for non-wasteful subsistence uses as required by Title VIII of the

Alaska National Interest Lands Conservation Act. The Board has delegated in-season management authority to the Federal fisheries manager. If fisheries run abundance is sufficient to allow for Federal subsistence harvest, the Federal fisheries manager will issue emergency special actions announcing season schedules, openings, closures and fishing methods. The Board took no action on Temporary Special Action Requests FSA22-02, -03, and -04 based on the adoption of FSA22-01 (FSB 2022).

The Federal Fisheries Manager responded to the Board's action by coordinating with State managers and implementing sequentially upriver a set of Federal salmon subsistence fisheries closures and gear restrictions to prohibit directed salmon harvests from June 1 through September 30, 2022. Gillnets with 4-inch stretched mesh or smaller and 60 feet or shorter were allowed to harvest nonsalmon fish. Live Chinook and summer and fall Chum salmon that were incidentally caught using this gear had to be released, however, dead fish could be retained. If fishermen encountered salmon in a particular area, they were requested to move their net to avoid harvesting salmon. Other nonsalmon fish gear types, including dip net, hook and line, longline, jigging gear, hand line, beach seine, fyke net, spear, or lead, were used to fish for nonsalmon fish all year, even during salmon fishing closures, but all Chinook and Chum salmon had to be released alive from these gears. The Coho Salmon run was projected to be below average, but retention of Coho Salmon was allowed, and no in-season assessment data indicated closing the subsistence harvest for Coho Salmon harvest was necessary.

#### 2023 Salmon Season

In 2023, Fisheries Special Action Request FSA23-02 was submitted by a resident of Rampart and requested the Federal Subsistence Board close the Federal public waters of the Yukon River drainage to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users throughout the 2023 season and require Federal subsistence fishing schedules, openings, closures, and fishing methods be determined by the Federal Fisheries Manager. The Board transferred the request to the Federal in-season manager because it fell within the manager's scope of authority granted in their newly revised delegation of authority letter to the Federal in-season manager (**Appendix A**).

The Federal in-season manager considered multiple sources of information when evaluating the special action request and developing the Federal management strategy. The sources of information included testimony from a public hearing and discussions at Tribal Consultations and preseason meetings. The Federal in-season manager also coordinated and reviewed preseason run information with State managers. After considering this information, the Federal in-season manager developed a conservative management strategy focused on protecting salmon stocks based on concerns expressed by local users and Tribal members and poor forecast data. The Federal management strategy indicated subsistence salmon fishing opportunities would be limited to federally qualified subsistence users in Federal public waters of the Yukon River drainage to provide a rural preference and to continue subsistence uses of salmon.

The summer season began with the State issuing emergency orders to close Chinook and summer Chum salmon fishing on June 2 in the Coastal District and District 1 and on June 4 in District 2 by all users for all uses. Subsequent closures were announced by the State for upriver districts based on salmon migration timing. During these closures, fishing for nonsalmon species was allowed using 4-inch or smaller mesh

set gillnets and hook and line, longline, jigging gear, hand line, beach seine, fyke net, spear, or leads. Live release of Chinook and summer Chum salmon was required. Harvest of Pink and Sockeye salmon was allowed during the closures (ADF&G 2023a). The Federal in-season manager did not issue a Federal special action closing Federal public waters to the harvest of Chinook and summer Chum salmon by nonsubsistence uses during the initial closures because there was no projected harvest of Chinook and summer Chum salmon. The management strategy shared publicly by the manager explained that Federal special actions would be issued if any opportunity to harvest Chinook and Chum salmon was provided.

About midway through the summer Chum Salmon run in 2023 the run was projected to exceed the escapement goal and provide a harvestable surplus. The Federal in-season manager announced harvest opportunities for summer Chum Salmon using selective gear types (i.e., dip nets, beach seines, fish wheels) under the following special actions: 2-KS-01-23, 2-KS-02-23, 2-KS-03-23, 2-KS-04-23, and 2-KS-05-23. Harvest opportunities for summer Chum Salmon were limited to federally qualified subsistence users in Federal public waters. Live release of Chinook Salmon was required as no harvest opportunities were provided for Chinook Salmon in 2023 due to poor run sizes.

The fall season began with subsistence harvest opportunities for Chum and Coho salmon. The Federal and State managers announced harvest opportunities for Chum Salmon early in the fall season because the majority of Chum Salmon entering the river were genetically summer Chum Salmon. The Federal inseason manager issued the following Temporary Special Actions: 2-FC-01-23, 2-FC-02-23, 2-FC-03-23, and 2-FC-04-23, which limited the Chum and Coho salmon harvest opportunities to federally qualified subsistence users in Federal public waters, but also put into effect mainstem closures for fall Chum Salmon that were expected to last for the remainder of the season due to poor Canadian-origin fall Chum Salmon run abundance. Due to poor abundance of Coho Salmon, on September 2 the State announced closures to retention of Coho Salmon. Because neither fall Chum nor Coho salmon were allowed to be retained, the Federal in-season manager rescinded all Federal actions that had limited salmon harvest to federally qualified subsistence users (by Special Action News Release 08-31-23). The Federal and State managers allowed directed harvest of fall Chum Salmon on the Teedriinjik River once the escapement goal was projected to be met. Harvest opportunity on the Teedriinjik stock was not limited to federally qualified subsistence users because the harvestable surplus was much greater than the expected fishing effort.

### **Biological Background**

#### Species Overview

The Yukon River drainage supports all five species of North American Pacific Salmon (Estensen et al. 2018). Of the five species, Chinook, Chum, and Coho salmon are the predominant salmon species harvested in subsistence fisheries within the drainage and are the focus of this Federal Special Action Request.

Chinook Salmon are distributed throughout much of the Yukon River drainage and have the earliest run timing of the five salmon species. Their documented spawning range extends from the Archuelinguk River (District 2) to the headwaters of the drainage in Canada. An estimated 40% of Yukon River

Chinook Salmon are Canadian-origin fish. Chinook Salmon enter the Yukon River in late May/early June through mid-July with the bulk of the run entering the river in June (Estensen et al. 2018).

Chum Salmon stocks in the Yukon River drainage are comprised of two genetically distinct runs, summer and fall, which differ in their distribution, run timing, and abundance. Summer Chum Salmon are distributed within the Alaska portion of the drainage typically as far upstream as Subdistrict 5A on the mainstem and District 6 on the Tanana River, while fall Chum Salmon primarily spawn in the upper portion of the drainage on both sides of the U.S.-Canada border (Estensen et al. 2018). Summer Chum Salmon enter the Yukon River in late May/early June through mid-July and their run timing overlaps with Chinook Salmon. In contrast, fall Chum Salmon have a later run timing and enter the Yukon River from mid-July through early September. Summer Chum Salmon tend to have larger run sizes than fall Chum Salmon.

Coho Salmon have a transboundary distribution and late run timing. While Coho Salmon's distribution extends into Canada, they are most abundant in the Yukon River drainage up to and including the Tanana River drainage. Coho Salmon enter the Yukon River from late July through September and their run timing overlaps with the second half of the fall Chum Salmon run.

While Yukon River Chinook, summer and fall Chum, and Coho salmon may vary in their distribution, run timing, and abundance, each has experienced dramatic declines in run size over the last four years.

# Run Size

Estimates of drainage-wide run size are produced postseason using abundance estimates from the Pilot Station and Eagle sonars, genetics, harvest estimates, and spawning escapements.

The run strength of Chinook Salmon has varied throughout the past 20 years with peaks around 300,000–375,000 fish and valleys below 150,000 fish (ADF&G 2022). Chinook Salmon run sizes were relatively high in 2017 and 2019 before declining in subsequent years. In 2023, the Chinook Salmon run was approximately 59,000 fish which was second only to 2022 as the lowest return on record (ADF&G 2023b, 2024c; Figure 2).

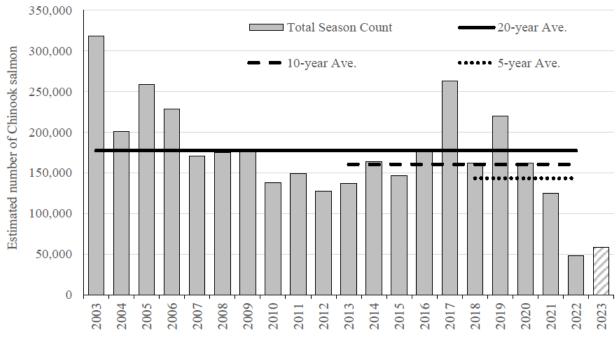


Figure 2. Estimated Chinook Salmon passage at Pilot Station sonar (ADF&G 2023b).

Since 2003, the run size of summer Chum Salmon ranged from approximately 155,000 fish in 2021 to over 4,000,000 fish in 2006 (ADF&G 2022). In general, summer Chum Salmon run sizes were good to excellent over this period. However, beginning in 2020 summer Chum Salmon populations declined significantly, reaching a record low of approximately 155,000 fish in 2021 (ADF&G 2022; **Figure 3**). In 2022 and 2023, run sizes improved slightly. However, the 2023 run was the fourth lowest since 2003 and far below the 10- and 20-year averages (ADF&G 2023b; **Figure 3**).

Since the mid-1970s, the run size of fall Chum Salmon ranged from approximately 95,000 fish in 2021 to over 2,800,000 fish in 1975 (ADF&G 2024d; **Figure 4**). Fall Chum Salmon runs were good to excellent during most years since 2003. Much like summer Chum Salmon, run sizes declined significantly in 2020 before reaching a record low in 2021 (**Figure 4**). Run sizes have improved since 2021 but the 2023 fall Chum Salmon run of approximately 320,000 fish was the fifth lowest on record (ADF&G 2024d; **Figure 4**).

The Coho Salmon run size index has generally been strong since 1995, ranging from lows of approximately 45,000 fish to highs of around 400,000 fish (ADF&G 2024d; **Figure 4**). Similar to Chum Salmon, Coho Salmon experienced a significant decline starting in 2020, reaching a record low of 45,500 fish in 2021 (**Figure 4**). In 2023, the preliminary run size index was approximately 65,000 Coho Salmon, which was the second lowest on record (ADF&G 2024d; **Figure 4**).

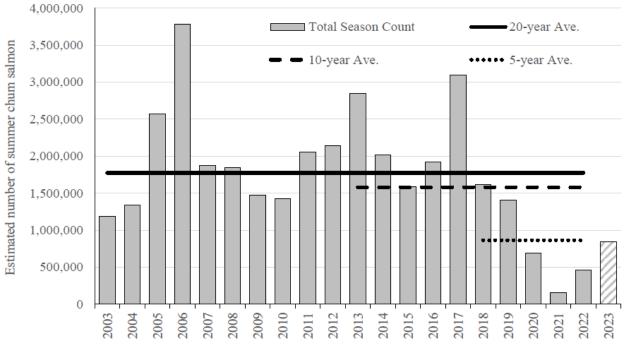


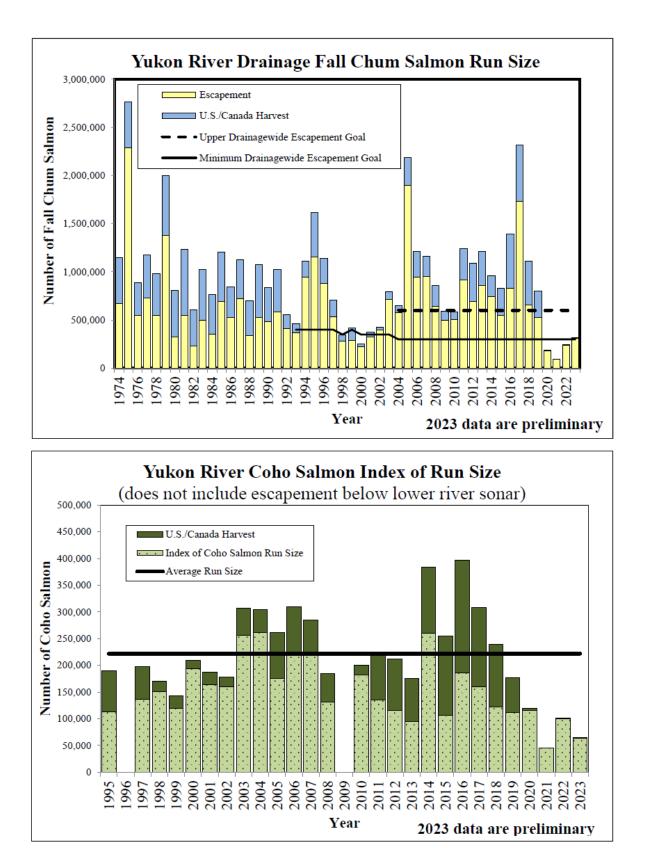
Figure 3. Estimated summer Chum Salmon passage at Pilot Station sonar (ADF&G 2023b).

### Escapement

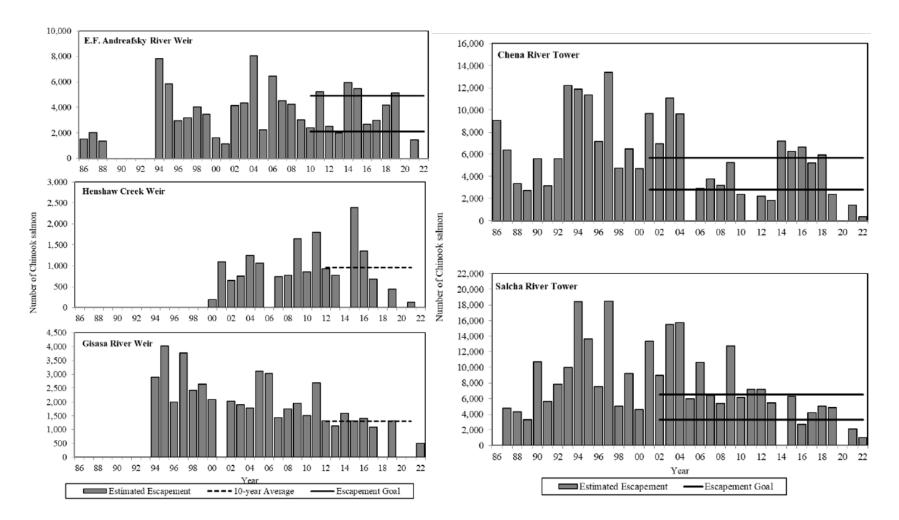
Spawning escapements are monitored throughout the Yukon River drainage using a variety of escapement projects and gear types. Data from these projects are used to determine if escapement goals were met and evaluate in-season management actions.

In the U.S. portion of the drainage, there are established escapement goals for Chinook Salmon in three tributaries that are monitored by aerial surveys (Anvik, Nulato, West Fork Andreafsky) and in three tributaries that are monitored by ground-based assessment projects (Chena, East Fork Andreafsky, Salcha).

No escapement goals were met for Chinook Salmon in 2023. Escapement goals at ground-based projects were met in most years until 2019 (**Figure 5**). Since then, goals have not been met. Poor escapements continued in 2023 with most estimates falling well below historical averages (**Table 2**). The estimate of Canadian-origin Chinook Salmon escapement into Canada in 2023 was 14,567 fish, which was the second lowest on record. The lower end of the historical IMEG (42,500) was not met for a fifth consecutive year (**Figure 6**).



**Figure 4**. Estimated drainage-wide run size of fall Chum Salmon (top) and index of run size of Coho Salmon (bottom) in the Yukon Area (ADF&G 2024d).



**Figure 5.** Chinook Salmon ground-based escapement estimates for selected tributaries in the U.S. (Alaska) portion of the Yukon River drainage, 1986–2022 (JTC 2023).

Project	Current Goal	Type of Goal	Historical Averageª	2023 Estimate
East Fork Andreafsky Weir	2,100–4,900	SEG	3,799	194 <sup>b</sup>
Pilot Station Sonar	-	_	171,649	58,529
Gisasa River Weir	-	_	2,000	489 <sup>b</sup>
Chena River Tower	2,800–5,700	BEG	5,663	1,070
Salcha River Tower	3,300–6,500	BEG	7,738	1,213
Eagle Sonar	_c	_	51,631	14,752 <sup>d</sup>

**Table 2**. Escapement goals and passage estimates for Chinook Salmon at selected Yukon River tributaries, 2023 (ADF&G 2023b).

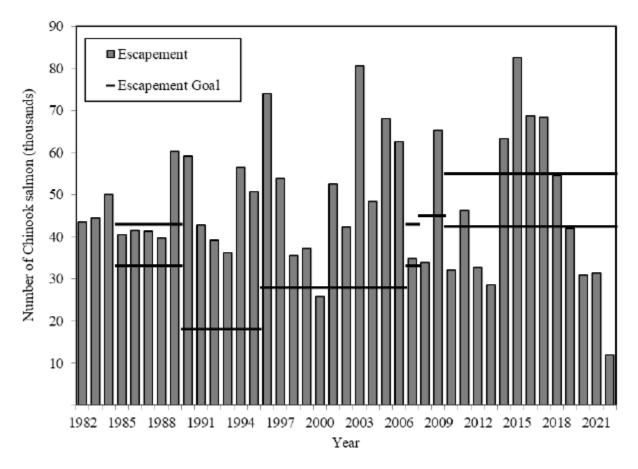
*Note:* En dash indicates no goal at the project.

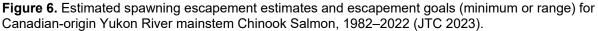
<sup>a</sup>Historical average includes all years the projects operated fully; years excluded have incomplete datasets due to weather and technical difficulties.

<sup>b</sup>High water prevented counts for a notable portion of the season. Estimates of missed passage are not available. Numbers shown are observed (i.e., minimum) counts only.

<sup>c</sup>The recent interim management escapement goal (IMEG) of 42,500–55,000 fish was not renewed by the Yukon River Panel in 2023.

<sup>d</sup>The passage estimate at Eagle Sonar is not an escapement estimate. Some harvest (U.S. and Canada) occurs between the project location and the spawning habitats.





Summer Chum Salmon have three established escapement goals within the drainage: drainage-wide, East Fork Andreafsky River, and Anvik River. Preliminary data indicate the drainage-wide goal was the only escapement goal met in 2023 (**Table 3**). However, the escapement estimates at the East Fork Andreafsky Weir and Anvik Sonar should be considered minimum estimates due to incomplete counts from missed sampling days (ADF&G 2024c). Other than this year's drainage-wide goal, no summer Chum Salmon escapement goals have been met since 2020 (ADF&G 2021, 2022, 2023a).

tilbuaries, 2023 (ADF&G 2023	,		Historical	
Project	Current Goal	Type of Goal	Median <sup>a</sup>	2023 Estimate
Drainage-wide <sup>b</sup>	500,000-1,200,000	BEG	1,183,009	845,988
East Fork Andreafsky Weir	>40,000	SEG	52,765	2,308°
Anvik Sonar	350,000–700,000	BEG	450,229	60,556 <sup>c</sup>
Gisasa River Weir	-	-	42,747	16,913
Chena River Tower	-	-	8,091	717
Salcha River Tower	-	-	13,882	652

 Table 3. Escapement goals and passage estimates for summer Chum Salmon at selected Yukon River tributaries, 2023 (ADF&G 2023b).

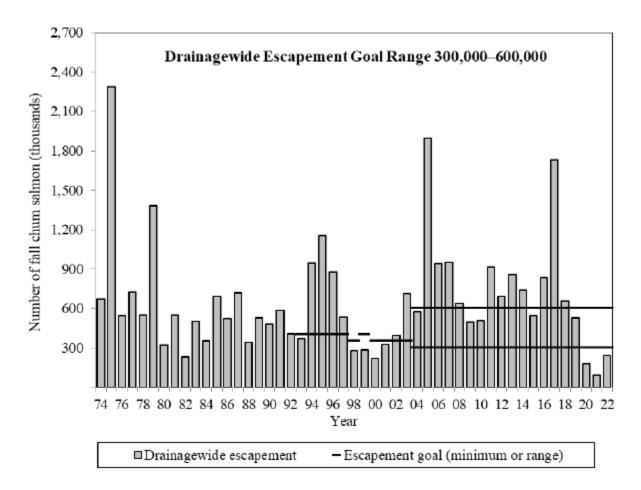
Note: En dash indicates no escapement goal at the project.

<sup>a</sup>Historical median includes all years the projects operated with the exclusion of years the projects operated poorly.

<sup>b</sup>Estimate of abundance at the Pilot Station sonar. Final drainage-wide escapement will incorporate subsistence harvest estimates.

<sup>c</sup>High water prevented counts for a notable portion of the season. Estimates of missed passage are not available. Numbers shown are observed (i.e., minimum) counts only.

Fall Chum Salmon have three established escapement goals in the U.S. portion of the drainage: drainagewide, Teedriinjik (Chandalar) River, and Delta River (**Figures 7 and 8**). All three escapement goals were met in 2023 (**Table 4**). Fall Chum Salmon have two IMEGs: Mainstem Canada and Fishing Branch River. The Mainstem Canada IMEG is assessed using Eagle sonar passage and harvest estimates in U.S. waters upstream of the sonar. The Mainstem Canada IMEG has not been achieved since 2019 (ADF&G 2024d; **Figure 9**; **Table 4**). In 2023, the preliminary escapement estimate was 32% below the IMEG range (ADF&G 2024d). The Fishing Branch River IMEG is assessed using the Fishing Branch River sonar/weir. The Fishing Branch River IMEG has not been achieved since 2017 and the preliminary escapement estimate in 2023 was 52% below the IMEG range (ADF&G 2024d; **Figure 9**; **Table 4**). The failure to meet the IMEGs in 2023, when all U.S. escapement goals were met and no harvest opportunity was provided for mainstem fall Chum Salmon, resulted from a weak Canadian component of the run. Canadian mainstem fall Chum Salmon historically made up 27% of the total run but have comprised only 10–17% of the total run since the start of the fall Chum Salmon declines in 2020 (ADF&G 2024e).

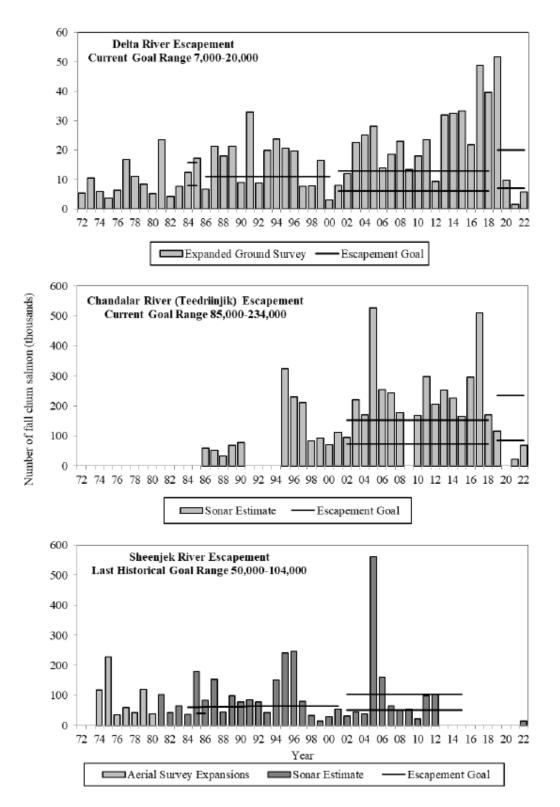


**Figure 7**. Estimated drainage-wide escapement of fall Chum Salmon, Yukon River, 1974–2022 (JTC 2023).

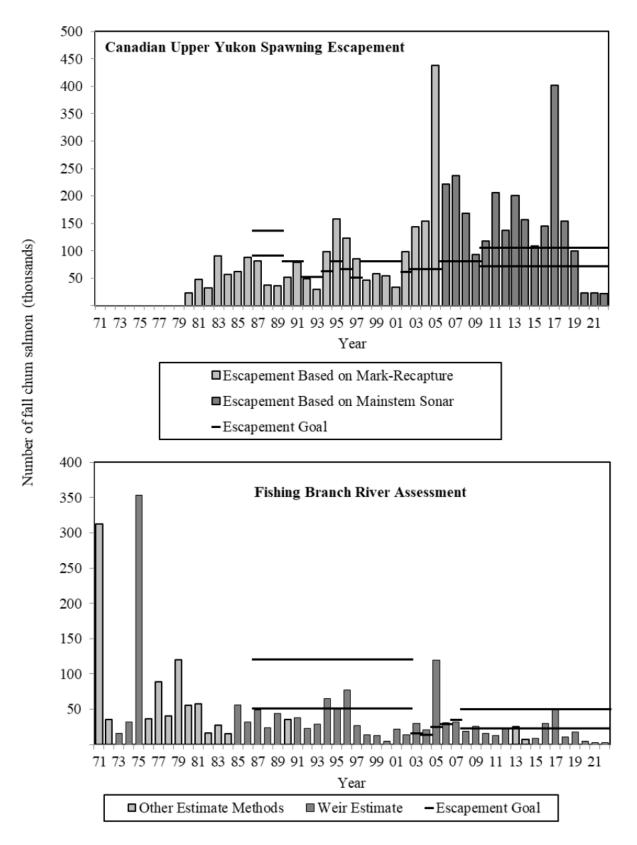
Coho Salmon have relatively few escapement monitoring projects in the drainage due to their late run timing and inclement weather during periods of peak spawning. The Delta Clearwater River had the only established escapement goal for this species, but it was discontinued in 2023. Aerial surveys were not conducted in 2023 due to inclement weather (ADF&G 2024d). In 2023, Coho Salmon escapement estimates in two monitored areas were below historical averages (**Table 5**).

### Age-Sex-Length Composition

The age-sex-length composition of salmon is important for biological and social reasons. From a biological perspective, age-sex-length data are used as a proxy for escapement quality. Older and larger female fish are considered higher quality because they produce more eggs, potentially increasing the reproductive potential and recruitment success of populations (Ohlberger et al. 2020). From a social perspective, subsistence users must expend more effort to fill their smokehouses and freezers when harvesting smaller fish.



**Figure 8**. Fall Chum Salmon escapement estimates for selected spawning areas in the U.S. (Alaska) portion of the Yukon River drainage, 1972–2022 (JTC 2023).



**Figure 9**. Estimated spawning escapement and escapement goals (minimum or range) for Canadianorigin fall Chum Salmon for the mainstem Yukon River and Fishing Branch River, 1972–2022 (JTC 2023).

Project	, Current Goal	Type of Goal	Historical Average: 2013–2022	Historical Average: 2018–2022	2023 Estimate <sup>l</sup>
Yukon River drainage- wide escapement estimate <sup>a</sup>	300,000–600,000	SEG	641,174	339,607	311,697
Delta River <sup>b</sup>	7,000–20,000 <sup>i</sup>	SEG	27,706	21,705	13,366
Tanana River estimate <sup>c</sup>	Ĺ	_	212,262	151,695	121,000 <sup>m</sup>
Teedriinjik (Chandalar) River <sup>d</sup>	85,000-234,000 <sup>h</sup>	SEG	202,777	94,294	136,551
Sheenjek River <sup>e</sup>	Ĺ	_	97,106	49,739	15,958
Yukon River mainstem (Eagle) passage estimate <sup>f</sup>	-	_	144,371	69,763	21,627
Mainstem escapement estimate <sup>g</sup>	70,000–104,000 <sup>k</sup>	IMEG	133,602	64,521	22,090
Fishing Branch River <sup>h</sup>	22,000–49,000	IMEG	15,561	7,643	11,528

 Table 4. Fall Chum Salmon passage or escapement estimates for selected spawning areas, Yukon River drainage, 2023 (ADF&G 2024d).

Note: En dash indicates no data were collected or calculated.

<sup>a</sup>Escapement estimates 2003–2021 are derived from Bayesian State-Space model as posterior medians. The distribution of stocks was highly variable in 2022 and 2023 compared to normal, so drainage-wide escapements were based on observed escapements for upper Yukon and mixed stock analysis for the Tanana River components.

<sup>b</sup>Population estimate generated from replicate foot surveys and stream life data using AUC (area-undercurve).

<sup>c</sup>Fall Chum Salmon passage estimate based on mark-recapture projects operated from 1995–2007 on the upper Tanana River and from 1999–2007 on the Kantishna River minus harvests.

<sup>d</sup>Split beam sonar estimate (1995–2006). DIDSON sonar (2007-present). Includes expansions to approximate the end of the run.

<sup>e</sup>Single beam sonar estimate (2000–2002), split beam sonar estimate (2003–2004), DIDSON sonar (2005–2012 and 2022).

<sup>f</sup>Sonar estimates include an expansion for fish that may have passed after operations ceased through October 18, except 2018 was expanded through October 23 for an extremely late run.

<sup>9</sup>Estimated mainstem Canadian escapement derived from mark-recapture project minus Canadian mainstem harvest and excluding Canadian Porcupine River drainage escapement.

<sup>h</sup>IMEG established 2008 based on percentile method.

Escapement goal revised to a sustainable escapement goal in 2019 based on percentile method.

<sup>j</sup>Tanana escapement goal range of 61,000–136,000 was discontinued 2019, Sheenjek escapement goal 50,000–104,000 was discontinued in 2016.

<sup>k</sup>Interim Management Escapement Goal (IMEG) range of 70,000 to 104,000 was established for 2010 to present is based on Canadian stock Ricker model.

Data are preliminary.

<sup>m</sup>Preliminary estimate based on mixed stock analysis minus harvest in the Tanana River.

Project	Historical Average: 2013–2022	Historical Average: 2018–2022	2023 Estimate <sup>d</sup>
Yukon River index of drainage-wide escapement <sup>a</sup>	130,395	99,141	63,241
Lost Slough (h)	611	659	_
Nenana Mainstem <sup>ь</sup> (h)	751	325	_
Wood Creek (h)	720	251	-
Seventeen Mile Slough (h)	1,264	373	-
Delta Clearwater River <sup>c</sup> (b)	5,658	2,029	1,794
Clearwater Lake and Outlet (h)	985	633	-
Richardson Clearwater River (h)	1,056	365	_

 Table 5. Coho Salmon passage or escapement estimates for selected spawning areas, Yukon River

 drainage, 2023 (ADF&G 2024d).

Note: Only peak counts presented. Survey rating is fair to good. Denotations of survey methods include (b)=boat and (h)=helicopter. En dash indicates no data available.

<sup>a</sup>Index of drainage-wide escapement based on Pilot Station sonar, which is expanded by portion of the run missed using nearby test fisheries, plus harvest below sonar site, then subtracts total drainage harvest to estimate escapement. Does not include the escapements to the Andreafsky River (East Fork was monitored 1995–2005 and averaged 8,000 Coho Salmon).

<sup>b</sup>Index area includes mainstem Nenana River between confluences of Lost Slough and Teklanika River. <sup>c</sup>Index area is lower 17.5 miles of system. Sustainable escapement goal (SEG) of 5,200–17,000 was discontinued in 2023. A BEG of greater than 9,000 fish was used from 1993 to 2003. <sup>d</sup>Data are preliminary.

The age-sex-length composition of Chinook Salmon was estimated at Pilot Station and Eagle sonars in 2023. At Pilot Station, the composition of age-5 (60%) Chinook Salmon was above the recent 10-year average while age-3 (<1%), age-4 (7%), age-6 (30%), and age 7 (3%) were below average (ADF&G 2023b). At the Eagle sonar, the age composition of Chinook Salmon followed similar patterns to Pilot Station with age-5 (53%) being above average and age-4 (3%) and age-6 (38%) being below average. However, in contrast to Pilot Station, the composition of age-7 (5%) Chinook Salmon was above average at the Eagle sonar (ADF&G 2023b). The average length of Chinook Salmon at Pilot Station was 721 mm which was the third smallest on record (ADF&G 2023b). The average length of Chinook Salmon was 752 mm at the Eagle sonar, which was the second smallest on record (ADF&G 2023b). The proportion of females approximated the historical average at the Pilot Station sonar (ADF&G 2023b). In contrast, approximately 31% of Chinook Salmon at the Eagle sonar were female, which was well below the 10-year average of 45% (ADF&G 2023b).

Summer and fall Chum salmon age-sex-length is estimated at the Lower Yukon Test Fishery. The agesex-length composition of summer Chum Salmon was not reported for 2023 (ADF&G 2023b). In 2023, the composition of age-4 (79%) fall Chum Salmon was above average while the composition of age-5 (18%) fish was below average (ADF&G 2024d). Fall Chum Salmon were smaller than average at the Lower Yukon Test Fishery in 2023 (ADF&G 2024d). The proportion of female fall Chum Salmon (55%) was similar to the long-term average (58%; ADF&G 2024d).

Coho Salmon age-sex-length composition is also estimated at the Lower Yukon Test Fishery. In 2023 the proportion of age-3 (25%) Coho Salmon was above average while the proportions of age-4 (65%) and age-5 (2%) fish were below average (ADF&G 2024d). Coho Salmon were smaller than average at the Lower Yukon Test Fishery. Coho Salmon length information was also reported for Pilot Station and was the second smallest on record for the project (ADF&G 2024d). The proportion of females (41%) was below the long-term average (47%) at the Lower Yukon Test Fishery (ADF&G 2024d).

## 2024 Forecasts

Preseason forecasts are used by managers to set expectations and guide preseason planning. While forecasts are inherently uncertain, they provide the best available information before in-season run data become available. The methods used for forecasts within the Yukon River drainage vary by species and are described in detail in the Season Summary/Season Outlook reports produced by the JTC (JTC 2023).

Forecasts for the 2024 season are typically reviewed at the spring Yukon River Panel meeting before being published and are not expected to be available until early April.

# **Harvest History**

### Commercial Harvest

Management of commercial salmon fisheries in the U.S. portion of the Yukon River drainage is in accordance with State of Alaska management plans (Estensen et al. 2018). There are currently approximately 400 commercial salmon permit holders, nearly all of whom are residents of Yukon River communities. Before commercial opportunity is provided, a harvestable surplus must be projected above what is needed for escapement goals, treaty objectives, and State subsistence harvest which is prioritized over commercial use. Because of overlap in run timing and species distributions, there may be restrictions on harvest for one species, such as Chinook Salmon, while commercial harvest is allowed for other species (e.g., Chum Salmon). When commercial opportunity is provided, harvest is driven by market interest.

Chinook Salmon have not been targeted in Yukon River commercial fisheries since 2007. From 1997 to 2007, the commercial harvest of Chinook Salmon ranged from approximately 8,500 to 114,000 fish (**Table 6**). Since 2007, directed commercial fisheries for Chinook Salmon have not been allowed in the drainage due to conservation concerns and low run sizes (Estensen et al. 2018, ADF&G 2021). However, in times of larger run abundance, Chinook Salmon may be caught incidentally and then retained for subsistence uses in Chum Salmon commercial fisheries. Incidentally-caught Chinook Salmon may also be sold when authorized by emergency order if Chinook Salmon escapement goals are projected to be met and if subsistence fishing for Chinook Salmon is not restricted (5 AAC 05.360(i)).

Year		District 2[		Subtotal	-	District 5		Subtotal (Districts 4–6)	Alaska Total
1997	66,384	39,363	_	105,747	1,457	3,678	2,728	7,863	113,610
1998	25,413	16,806	0	42,219	_	517	963	1,480	43,699
1999	37,161	27,133	538	64,832	1,437	2,604	689	4,730	69,562
2000	4,735	3,783	-	8,518	-	_	-	-	8,518
2001	-	-	-	-	-	—	-	-	-
2002	11,089	11,440	-	22,529	-	771	1,066	1,837	24,366
2003	22,709	14,220	-	36,929	562	1,134	1,813	3,509	40,438
2004	28,403	24,145	-	52,548	-	1,546	2,057	3,603	56,151
2005	16,694	13,413	-	30,107	-	1,469	453	1,922	32,029
2006	23,748	19,843	315	43,906	-	1,839	84	1,923	45,829
2007	18,616	13,306	190	32,112	0	1,241	281	1,522	33,634
2008	2,530	2,111	-	4,641	0	-	0	0	4,641
2009	90	226	-	316	0	-	0	0	316
2010	5,744	4,153	-	9,897	0	-	0	0	9,897
2011	36	46	-	82	-	-	0	0	82
2012	0	0	-	0	0	-	0	0	0
2013	0	0	-	0	0	-	0	0	0
2014	0	0	-	0	0	-	0	0	0
2015	0	0	-	0	0	-	0	0	0
2016	0	0	-	0	-	-	0	0	0
2017	168	0	-	168	-	-	0	0	168
2018	-	-	-	-	-	-	-	-	_
2019	2,100	1,010	-	3,110	-	0	0	0	3,110ª
2020	-	-	-	-	-	-	-	-	_
2021	-	-	-	-	-	-	-	-	-
2022	_	_	_	-	-	-	-	-	

Table 6. Chinook Salmon commercial harvest totals by district, 1997–2022 (Ransbury et al. 2022).

*Note*: En dash indicates no commercial fishing activity occurred. <sup>a</sup>Incidental harvest to Chum Salmon directed fishery in the summer season and allowed sales in the fall season.

Since 2001, the commercial harvest of summer Chum Salmon ranged from 10,685 fish in 2003 to 576,700 fish in 2018 (**Table 7**). Commercial harvests of summer Chum Salmon were low (~10,000–50,000 fish) in the early 2000s compared to the mid-to-late 2010s when harvests commonly exceeded 500,000 fish (Estensen et al. 2018, ADF&G 2022). In general, commercial harvest of summer Chum Salmon is highest in Districts 1 and 2; however, in some years commercial harvests in Subdistrict 4-A exceed those in District 2. There have been no commercial openings for summer Chum Salmon in the Yukon River since 2020 due to low run sizes and subsistence fisheries closures (ADF&G 2023b; **Table 7**).

Year	District 1	District 2	Subtotal (Districts 1–2)	Subdistrict 4-A	District 6	Total (Districts 1–6)
2013	207,871	171,272	379,143	100,507	5,937	485,587
2014	198,240	229,107	427,347	96,385	6,912	530,644
2015	172,639	181,447	354,086	_	4,770	358,856
2016	293,522	228,267	521,789	_	4,020	525,809
2017	345,395	47,770	393,165	159,051	4,300	556,516
2018	250,958	195,423	446,381	126,892	3,427	576,700
2019	183,658	41,835	225,493	_	1,596	227,089
2020	9,600	4,355	13,955	—	_	13,955
2021	_	_	-	_	_	_
2022	_	_	-	_	_	_
2023	-	_	_	_	_	-
Average: 2013–2020	207,735	137,435	345,170	120,709	4,423	409,395

Table 7. Summer Chum Salmon commercial harvests	y district for 2013–2023 (	(ADF&G 2023b).
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Note: Commercial harvest only includes summer Chum Salmon sold in the round. Averages do not include 2021–2023 when no commercial fisheries occurred.

The commercial harvest of fall Chum Salmon has varied throughout the past 20 years from lows of around 2,500 fish to highs of approximately 490,000 fish (**Table 8**). Like summer Chum Salmon, commercial catches of fall Chum Salmon are concentrated in districts in the lower Yukon River (**Table 8**). No commercial fishing opportunities have been provided for fall Chum Salmon since 2019 due to low run sizes and subsistence fisheries closures (ADF&G 2024d; **Table 8**).

Coho Salmon tend to be harvested incidentally in fall Chum Salmon commercial fisheries, but the State may provide directed opportunities for this species (Estensen et al. 2018). Since 2001, the commercial harvest of Coho Salmon has ranged from 3,750 fish in 2010 to 201,482 fish in 2016 (**Table 9**). While commercial harvests of Coho Salmon have fluctuated over time, harvests have generally been higher in recent years (**Table 9**). The majority of commercially caught Coho Salmon are harvested in lower river districts (**Table 9**). No commercial opportunities have been provided for Coho Salmon since 2019 (ADF&G 2024d; **Table 9**).

Year	District 1	District 2	District 3	Subtotal (Districts 1–3)	District 4	District 5	District 6	Subtotal (Districts 4–6)	Yukon Total
2003	5,586	_	_	5,586	1,315	_	4,095	5,410	10,996
2004	660	_	_	660	_	-	3,450	3,450	4,110
2005	130,525	_	_	130,525	_	-	49,637	49,637	180,162
2006	101,254	39,905	_	141,159	-	1,667	23,353	25,020	166,179
2007	38,852	35,826	_	74,678	_	427	15,572	15,999	90,677
2008	67,704	41,270	-	108,974	-	4,556	5,967	10,523	119,497
2009	11,911	12,072	-	23,983	-	-	1,893	1,893	25,876
2010	545	270	-	815	-	-	1,735	1,735	2,550
2011	127,735	100,731	-	228,466	-	1,246	10,917	12,163	240,629
2012	139,842	129,284	-	269,126	811	2,419	17,336	20,566	289,692
2013	106,588	106,274	-	212,862	-	1,041	24,148	25,189	238,051
2014	51,829	59,138	-	110,967	-	1,264	3,368	4,632	115,599
2015	100,562	74,214	-	174,776	-	1,048	15,646	16,694	191,470
2016	226,576	213,225	-	439,801	-	7,542	18,053	25,595	465,396
2017	328,410	134,668	-	463,078	1,402	1,952	23,270	26,624	489,702
2018	198,950	170,645	-	369,595	596	896	16,698	18,190	387,785
2019	145,692	106,141	-	251,833	-	900	15,627	16,527	268,360
2020	-	_	-	-	-	-	-	-	-
2021	-	_	-	-	-	-	-	-	-
2022	-	_	-	-	-	-	-	_	-
2023	-	-	_	_	-	_	-	-	-
Average: 2018– 2022	172,321	138,393	NA	310,714	NA	898	16,163	17,359	328,073

Table 8. Fall Chum Salmon commercial harvest by district, Yukon Area, 2003–2023 (ADF&G 2024d).

*Note:* En dash indicates no commercial fishing occurred.

Year	District 1	District 2	District 3	Subtotal (Districts 1–3)	District 4	District 5	District 6	Subtotal (Districts 4–6)	Yukon Total
2003	9,757	_	_	9,757	_	_	15,119	15,119	24,876
2004	1,583	_	_	1,583	_	_	18,649	18,649	20,232
2005	36,533	-	_	36,533	_	_	21,778	21,778	58,311
2006	39,323	14,482	_	53,805	_	_	11,137	11,137	64,942
2007	21,720	21,487	_	43,207	_	_	1,368	1,368	44,575
2008	13,946	19,248	_	33,194	_	91	2,408	2,499	35,693
2009	5,992	1,577	_	7,569	_	_	742	742	8,311
2010	1,027	1,023	_	2,050	_	_	1,700	1,700	3,750
2011	45,335	24,184	_	69,519	_	_	7,502	7,502	77,021
2012	39,757	29,063	_	68,820	0	634	5,335	5,969	74,789
2013	27,304	31,456	_	58,760	_	0	7,439	7,439	66,199
2014	54,804	48,602	_	103,406	_	0	1,286	1,286	104,692
2015	66,029	54,860	_	120,889	_	0	8,811	8,811	129,700
2016	113,669	67,208	_	180,877	_	54	20,551	20,605	201,482
2017	95,982	33,277	_	129,259	0	0	9,656	9,656	138,915
2018	65,431	40,845	_	106,276	0	0	4,314	4,314	110,590
2019	40,621	15,622	_	56,243		0	2,348	2,348	58,591
2020	_	_	_	_	_	_	_	_	_
2021	_	_	_	_	_	_	_	_	_
2022	_	_	_	_	_	_	_	_	_
2023	_	_	_	_	_	_	_	_	_
Average:						-			
2018– 2022	53,026	28,234	NA	81,260	NA	0	3,331	3,331	84,591

Table 9. Coho Salmon commercial harvest by district, Yukon Area, 2003–2023 (ADF&G 2024d).

*Note:* En dash indicates no commercial fishing occurred.

### Subsistence Harvest

The Alaska Department of Fish and Game estimates the harvest of salmon for subsistence purposes by Federally qualified subsistence users in the Alaska portion of the Yukon River drainage based on the results of postseason harvest surveys, returned permits, test fishery projects, and salmon retained for personal use from commercial catches. Harvest estimates from 2013 through 2023 are provided in **Tables 10–13** (ADF&G 2024f). Community salmon harvest compositions typically reflect the salmon species that are most abundant locally although other factors such as run timing, flesh quality, food preferences, and number of dogs to feed also contribute to harvest patterns. Even though communities tend to harvest certain species of salmon more than others, the harvest of a mix of salmon species is a drainage-wide pattern and an important subsistence strategy, particularly in years when certain species have low abundance, but others are prevalent (Trainor et al. 2021).

Community	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	1993-2002 average	2003-12 average	2013-22 average
Hooper Bay	1,210	455	534	284	314	456	784	436	13	54	25	636	522	454
Scammon Bay	332	108	432	602	747	666	1,233	1,040	17	116	104	755	816	529
Coastal District total	1,542	563	966	886	1,061	1,122	2,017	1,476	30	170	129	1,391	1,339	983
Nunam Iqua	12	62	210	190	235	78	470	381	78	105	4	606	440	182
Alakanuk	275	214	436	465	838	414	1,818	1,394	229	84	161	1,454	1,119	617
Emmonak	553	463	612	939	1,731	1,203	2,419	1,033	346	203	79	2,441	2,246	950
Kotlik	794	617	661	1,158	1,767	1,556	2,333	912	78	0	23	2,177	1,711	988
District 1 total	1,634	1,356	1,919	2,752	4,571	3,251	7,040	3,720	731	392	267	6,678	5,516	2,737
Pilot Station	258	163	382	652	818	581	1,919	1,034	321	339	198	2,239	1,781	647
Marshall	328	128	128	512	1,554	914	1,261	924	9	64	10	2,636	2,100	582
Mountain Village	266	178	370	809	1,060	1,021	1,238	1,025	152	33	19	1,946	1,924	615
Pitkas Point	37	79	44	156	492	365	1,096	249	13	11	5	700	435	254
St. Mary's	215	68	261	1,032	919	1,172	2,735	1,500	220	75	69	2,365	2,334	820
District 2 total	1,104	616	1,185	3,161	4,843	4,053	8,249	4,732	715	522	301	9,886	8,573	2,918
Russian Mission	236	16	365	321	1,368	1,043	1,561	432	24	10	35	2,290	1,755	538
Holy Cross	204	0	68	557	822	580	1,483	192				3,047	2,343	488
Shageluk	4	32	14	23	86	181	262	90		5		451	350	77
District 3 total	444	48	447	901	2,276	1,804	3,306	714	24	15	35	5,787	4,448	998
Anvik	121		58	241	709	566	655	242				658	1,114	288
Grayling	226	3	22	370	749	888	1,446	264				1,647	1,603	496
Kaltag	348	10	119	1,358	1,959	570	1,225	577				1,477	2,255	771
Nulato	602		33	1,957	2,132	1,260	2,396	1,748				1,889	2,490	1,266
Koyukuk	898	52	26	612	648	859	1,088	268			7	509	763	556
Galena	275	1	372	993	2,224	1,262	2,895	695	2		16	1,829	2,130	969
Ruby/Kokrines	357	6	68	344	568	1,126	1,036	562				1,829	942	508
Huslia/Hughes	68	51	38	94	454	170	871	186			3	348	363	193
Allakaket/Alatna/Bettles	6	9	35	46	31	48	134	176				198	83	49
District 4 total	2,901	132	771	6,015	9,474	6,749	11,746	4,718	2		26	10,385	11,743	4,251
Tanana	1,200	88	141	2,129	2,961	5,108	3,408	1,905	72	191	183	3,308	3,622	1,720
Rampart/Stevens Vill.	274		1	228	155	284	446	485	5	85	69	3,053	1,342	196
Beaver	107		69	165	585	332	1,413	304	13			938	673	332
Fort Yukon/Birch Creek	1,561	93	480	1,225	4,224	4,704	4,563	757	5	4	142	3,313	2,913	1,762
Circle/Central	178		185	260	744	683	694	175	5			1,128	759	292
Eagle	175	76	395	864	1,730	1,011	788	280	38			1,556	1,374	595
Venetie/Chalkyitsik	311	17	308	586	780	443	660	32	0		154	473	415	314
District 5 total	3,806	274	1,579	5,457	11,179	12,565	11,972	3,938	138	280	548	13,769	11,097	5,119
Manley	165	92	121	230	103	210	94	33				270	268	131
Minto	60		23	35	101		35	5				386	72	32
Nenana/Healy	87	139	263	464	309	181	404	230	6			821	641	208
District 6 Total	312	231	407	729	513	391	533	268	6			1,477	981	339
Grand Total	11,743	3,220	7,274	19,901	33,917	29,935	44,863	19,566	1,646	1,379	1,306	49,373	43,697	17,344

**Table 10**. Chinook Salmon: Estimated harvest for subsistence by communities with a customary and traditional use determination from 2013 through 2023 (Source: ADF&G 2024f; 2021, 2022, and 2023 preliminary data; blank cell=0).

Community	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	1993-2002 average	2003-12 average	2013-22 average
Hooper Bay	13,629	13,236	11.870	6,324	7.818	8,346	2.999	3.450	290	1.983	4.658	11,030	12,285	6,995
Scammon Bay	9,506	6.068	8,598	5,520	6,033	6,850	4,037	3,929	13	1,142	1,951	3,742	4,891	5,170
Coastal District total	23,135	19,304	20,468	11,844	13,851	15,196	7,036	7,379	303	3,125	6,609	14,772	17,177	12,164
Nunam Igua	2,651	2.010	2,239	2,130	1,759	1,549	1,105	1,071	16	186	400	2,288	2,383	1.472
Alakanuk	7,520	9,120	4,469	6,527	4,993	5,448	6,276	3,924	66	396	4,566	6,837	6,914	4,874
Emmonak	8,209	7,143	9,973	8,976	6,933	7,036	8,404	5,463	170	1,735	4,242	10,373	10,791	6,404
Kotlik	10,136	5,621	4,960	8,925	8,776	7,007	6,994	4,831	102	53	855	7,869	5,512	5,741
District 1 total	28,516	23,894	21,641	26,558	22,461	21,040	22,779	15,289	354	2,370	10,063	27,367	25,600	18,490
Pilot Station	5,299	5,728	4,702	4,796	4,952	4,015	6,871	3,881	344	401	3,207	5,375	5,105	4,099
Marshall	3,986	6,189	4,351	5,180	5,166	3,311	2,703	2,009	11	144	938	2,437	3,051	3,305
Mountain Village	11,861	7,059	6,063	8,782	7,230	5,414	4,320	3,180	39	131	2,938	8,746	8,748	5,408
Pitkas Point	2,186	1,588	1,225	1,485	1,489	1,390	1,103	478	21	18	721	1,200	835	1,098
St. Mary's	9,167	5,570	8,216	7,379	4,967	4,486	7,349	4,087	74	134	1,433	7,882	7,114	5,143
District 2 total	32,499	26,134	24,557	27,622	23,804	18,616	22,346	13,635	489	828	9,237	25,640	24,852	19,053
Russian Mission	3,967	3,181	2,626	1,798	2,645	2,245	1,483	574	49	50	509	1,363	1,158	1,862
Holy Cross	262	97	421	991	242	306	199	174			141	785	500	337
Shageluk	463	470	80	275	804	495	673	113		9		4,810	2,047	376
District 3 total	4,692	3,748	3,127	3,064	3,691	3,046	2,355	861	49	59	650	6,958	3,705	2,469
Anvik	830	2,052	777	1,117	330	437	223	123			143	1,374	992	654
Grayling	618	1,617	509	878	738	779	879	58			92	1,901	1,142	760
Kaltag	67	954	216	467	185	25	180	228				626	361	290
Nulato	401	158	6	1,001	1,588	241	157	39				865	372	449
Koyukuk	4,459	300		119	96	150	21	24			21	613	815	646
Galena	179	377	1,059	1,689	1,228	349	1,223	58				1,971	1,217	685
Ruby/Kokrines	681	29	88	678	107	970	464					2,340	1,388	377
Huslia/Hughes	4,070	3,214	4,609	4,764	9,295	4,726	3,915	1,804	2	141	20	4,033	5,229	3,654
Allakaket/Alatna/Bettles	2,456	1,280	2,513	3,015	2,857	4,844	472	1,705		45	38	3,709	3,583	1,919
District 4 total	13,761	9,981	9,777	13,728	16,424	12,521	7,534	4,039	2	186	314	17,431	15,099	8,795
Tanana	9,565	2,612	3,162	3,685	3,086	2,733	530	338	18	74	318	3,340	3,821	2,580
Rampart/Stevens Vill.	55	70		629	10	1		3			28	753	323	77
Beaver	12			23	98	8	27					192	73	19
Fort Yukon/Birch Creek	225	19		12	98	44	12			4	9	918	1,048	41
Circle/Central	66											105	50	7
Eagle	50											127	154	6
Venetie/Chalkyitsik		16				114					25	174	92	13
District 5 total	9,973	2,717	3,162	4,349	3,292	2,900	569	341	18	78	380	5,610	5,561	2,740
Manley	45	182	9	32	16	78	3	7				732	157	47
Minto	258	24		4	234			1				503	145	65
Nenana/Healy	642	275	60	19	603	440	409	23	4	36		2,589	936	251
District 6 Total	945	481	69	55	853	518	412	31	4	36		3,823	1,223	340
Grand Total	113,521	86,259	82,801	87,220	84,376	73,837	63,031	41,575	1,219	6,682	27,253	101,600	93,217	64,052

**Table 11.** Summer Chum Salmon: Estimated harvest for subsistence by communities with a customary and traditional use determination from 2013 through 2023 (Source: ADF&G 2024f; 2021, 2022, and 2023 preliminary data; blank cell=0).

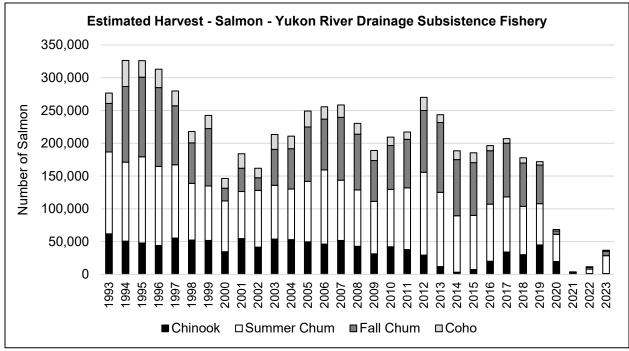
Community	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	1993-2002 average	2003-12 average	2013-22 average
Hooper Bay	91	137	79	105	137	158	210	407	28	130	42	148	127	148
Scammon Bay	58	115	119	657	416	364	605	245	11	106	123	90	74	270
Coastal District total	149	252	198	762	553	522	815	652	39	236	165	238	201	418
Nunam Iqua	93	128	210	111	52	188	102	16	3	14		174	188	92
Alakanuk	328	593	1,067	743	424	510	352	108	22	162	149	487	663	431
Emmonak	2,165	2,465	3,244	2,501	2,735	2,208	1,868	1,331	117	919	1,588	1,552	2,030	1,955
Kotlik	1,087	886	1,356	1,217	1,370	759	1,929	139	1	71	191	2,278	558	882
District 1 total	3,673	4,072	5,877	4,572	4,581	3,665	4,251	1,594	143	1,166	1,928	4,491	3,439	3,359
Pilot Station	777	796	1,346	903	1,065	1,116	997	468	296	289	522	1,004	792	805
Marshall	853	1,100	1,731	1,106	532	415	644	13			5	676	426	639
Mountain Village	2,174	1,484	1,398	1,210	1,560	872	1,180	259	137	143	847	1,258	1,002	1,042
Pitkas Point	65	400	172	232	172	112	139	72			6	178	33	136
St. Mary's	1,009	2,037	1,611	1,088	753	470	844	125	2		79	474	596	794
District 2 total	4,878	5,817	6,258	4,539	4,082	2,985	3,804	937	435	432	1,459	3,590	2,848	3,417
Russian Mission	804	365	449	235	671	349	469			16	126	215	342	336
Holy Cross	855	1,840	763	583	324	176	171	26				713	314	592
Shageluk	105	252	176	179	289	174	114			9		164	226	144
District 3 total	1,764	2,457	1,388	997	1,284	699	754	26		25	126	1,091	882	939
Anvik	763	1,028	680	527	296	500	45	222		12		293	305	453
Grayling	471	1,451	1,184	499	272	750	45	54			73	1,001	639	591
Kaltag	583	2,828	1,255	680	142	66	103	0				654	874	707
Nulato	2,995	3,839	2,248	2,681	1,762	869	662	0				867	1,082	1,882
Koyukuk	5,308	998	2,838	297	166	295	287	0				1,247	932	1,274
Galena	602	3,368	2,542	3,319	4,760	1,401	1,129	19				2,559	2,222	1,904
Ruby/Kokrines	2,505	972	713	526	97	842	242	0				1,815	1,296	737
Huslia/Hughes	1,257	927	1,226	954	543	859	420	28		62	5	352	920	628
Allakaket/Alatna/Bettles	707	525	588	551	1,535	362	1,299	42				259	608	561
District 4 total	15,191	15,936	13,274	10,034	9,573	5,944	4,232	365		74	78	9,047	8,876	7,462
Tanana	31,546	14,131	19,627	21,261	21,952	16,731	12,039	1,158	59	165	356	19,135	19,698	13,867
Rampart/Stevens Vill.	940	6,700	186	4,500		1,417	98	20	4	5	4	1,963	1,223	1,387
Beaver	21	323	76	228		141	17					469	124	90
Fort Yukon/Birch Creek	16,453	8,025	6,257	7,728	4,523	3,487	7,153	133	7		5	5,149	7,973	5,377
Circle/Central	1,397	1,277	1,652	1,306	2,182	2,877	2,069	9				2,460	912	1,277
Eagle	18,871	17,450	17,185	15,765	19,126	16,539	16,610					6,777	13,859	13,505
Venetie/Chalkyitsik	5,589	1,663	2,594	5,883	10,574	2,544	2,804	43		497	2,744	3,998	1,684	3,219
District 5 total	74,817	49,569	47,577	56,671	58,357	43,736	40,790	1,363	70	667	3,109	39,952	45,473	37,362
Manley	1,539	2,579	1,697	414	809	3,645	2,457	172				6,552	3,096	1,664
Minto	593	472	140	40	18		13					1,488	327	160
Nenana/Healy	3,852	4,545	3,981	3,544	2,640	4,937	1,801	19	17	12	2	8,006	10,331	2,535
District 6 Total	5,984	7,596	5,818	3,998	3,467	8,582	4,271	191	17	12	2	16,046	13,755	3,994
Grand Total	106,456	85,699	80,390	81,573	81,897	66,133	58,917	5,128	704	2,612	6,867	74,455	75,474	56,951

**Table 12.** Fall Chum Salmon: Estimated harvest for subsistence by communities with a customary and traditional use determination from 2013 through 2023 (Source: ADF&G 2024f; 2021, 2022, and 2023 preliminary data; blank cell=0).

Community	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	1993-2002 average	2003-12 average	2013-22 average
Hooper Bay	73	118	95	121	218	119	342	150	41	94	181	114	60	137
Scammon Bay	214	86	79	234	206	746	462	189	9	197	114	62	112	242
Coastal District total	287	204	174	355	424	865	804	339	50	291	295	175	171	379
Nunam Igua	83	153	229	58	20	184	21	19	4	31		111	113	80
Alakanuk	167	443	581	183	199	190	380	123	8	84	264	296	316	236
Emmonak	517	613	852	717	723	329	379	331	21	170	324	486	713	465
Kotlik	457	573	438	273	102	264	1,182	79	3	4	120	1,075	309	338
District 1 total	1,224	1,782	2,100	1,231	1,044	967	1,962	552	36	289	708	1,967	1,451	1,119
Pilot Station	136	568	305	136	91	121	147	174	74	74	128	593	253	183
Marshall	508	468	1,511	409	139	112	212	147	15	116		478	343	364
Mountain Village	271	202	723	436	729	267	273	126	37	85	197	648	597	315
Pitkas Point	41	123	72	22	224	54		10		5	12	329	60	55
St. Mary's	124	408	391	128	213	37	10	37		4	22	325	226	135
District 2 total	1,080	1,769	3,002	1,131	1,396	591	642	494	126	284	359	2,373	1,478	1,052
Russian Mission	152	124	154	6	483	123	104	7		26	41	228	183	118
Holy Cross	0	103	246	134	0	23	63	6				51	123	72
Shageluk	219	113	28		14	8	65	7		4		117	65	51
District 3 total	371	340	428	140	497	154	232	20		30	41	396	371	221
Anvik	97	197	46	184	11	15	55	23		24		60	195	72
Grayling	34	403	212	35	0	0	75	52				247	214	101
Kaltag	306	514	18	53	3	34	1	0				262	249	116
Nulato	125	454	48		85	220	27	0				128	230	120
Koyukuk	3,267	50	416	1	6	22	38	0				241	261	475
Galena	170	718	654	201	136	216	120	13				381	873	248
Ruby/Kokrines	345	335	185	226	22	26	32					691	560	146
Huslia/Hughes	360	282	310	93	171	1,020	80	45		84	5	155	402	245
Allakaket/Alatna/Bettles	236	109	52	33	92	27	69	5				17	75	62
District 4 total	4,940	3,062	1,941	826	526	1,580	497	138		108	5	2,184	3,060	1,362
Tanana	1,135	1,788	2,434	639	874	1,355	82	120	8	14	32	3,957	2,170	845
Rampart/Stevens Vill.			2	52		11	7	12	21			39	70	11
Beaver		2										19	36	0
Fort Yukon/Birch Creek	7	201	2	1	7		4					266	389	22
Circle/Central	150			38								25	68	19
Eagle		1										22	3	0
Venetie/Chalkyitsik	6	38	24	30	18		12	16				90	55	14
District 5 total	1,298	2,030	2,462	760	899	1,366	105	148	29	14	32	4,418	2,792	911
Manley	447	1,177	1,263	323	750	918	381	330				3,708	1,882	699
Minto	266	37	270									513	60	72
Nenana/Healy	1,962	3,002	3,359							47		6,277	6,732	1,506
District 6 Total	2,675	4,216	4,892	3,293	2,142	2,540	856	510	49	47		10,497	8,673	2,122
Grand Total	11,875	13,403	14,999	7,736	6,928	8,063	5,098	2,201	290	1,063	1,440	22,010	17,997	7,166

**Table 13.** Coho Salmon: Estimated harvest for subsistence by communities with a customary and traditional use determination from 2013 through 2023 (Source: ADF&G 2024f; 2021, 2022, and 2023 preliminary data; blank cell=0).

For the Yukon River drainage, salmon subsistence harvest estimates since 2019 are by far the lowest in the historical record since 1993 (ADF&G 2024f; **Figure 10**). Beginning in 1992, annual salmon subsistence harvest estimates have been comparable based on consistent methodology (Holder and Hamner 1995).



**Figure 10**. Estimated harvest of salmon for subsistence by federally qualified subsistence users in the Yukon River drainage from 1993 to 2023 (ADF&G 2024f).

For 2023, preliminary harvest estimates are 1,306 Chinook Salmon, 27,253 summer Chum Salmon, 6,867 fall Chum Salmon, and 1,440 Coho Salmon.

For comparison, the recent 10-year average (2013–2022) estimated harvests are 17,344 Chinook Salmon, 64,052 summer Chum Salmon, 56,951 fall Chum Salmon, and 7,166 Coho Salmon. Overall, 108,647 (75%) fewer salmon were harvested in 2023 compared to the recent 10-year average.

## **Current Events**

## Summary of Public Hearing

A teleconferenced public hearing was held on March 20, 2024. Testimony from twelve individuals was provided. Organizations represented by some of the speakers included the Native Village of Eagle, the Yukon River Intertribal Fish Commission, and the Yukon-Kuskokwim Regional Advisory Council.

All participants supported implementing a closure to non-federally qualified users. One speaker supported the Special Action Request but did not support a closure to Chinook Salmon. Another speaker supported the Special Action Request but only for Chinook Salmon. A representative for the Yukon-Kuskokwim

Regional Advisory Council stated the Council supported the Special Action Request but requested that the villages of Chevak, Hooper, and Scammon Bay be exempt from any closures.

Participants noted that people have been unable to feed their families and some communities have not fished the Yukon River for several years. Several speakers stated that management approaches need to allow communities in both the lower and the upper Yukon River to harvest. Two speakers noted that during the past 20 years, subsistence opportunities and commercial fisheries sometimes open the lower Yukon River preventing salmon from reaching the upper Yukon River that remains closed to all harvesting, which has caused upper river communities to suffer. The current situation was described as a crisis. One speaker said that if there were closures along the upper river then cultural or education permits should be allowed for upper river villages to implement education programs such as culture camps. Another speaker noted that specific closures may prevent families from accessing their traditional fishing areas. While other areas may be open for harvest, rising fuel costs will likely prevent them from fishing in these areas.

Speakers stated that the State of Alaska has repeatedly failed to meet escapement goals and has prioritized commercial fisheries over subsistence harvest. Several speakers stated that there should be no commercial fishing along the Yukon River until escapement goals are met. One speaker noted that commercial fishing for summer Chum Salmon would likely prevent some tributaries from meeting escapement goals. Several speakers also referred to the need to meet Canadian border passage goals, and the implications this goal has for Yukon River escapement goals. Several participants expressed concern about Chinook Salmon mortality due to incidental harvest and release of Chinook Salmon.

Two participants also stated that the Federal in-season manager has previously mirrored actions taken by the State of Alaska, which in effect provided no rural subsistence priority. Three participants stated that Federal in-season management was needed to facilitate tribal co-stewardship and co-management, and another expressed the need for co-management in general. These participants stated that federally qualified subsistence users need to be involved in making management decisions regarding season opening and closing dates and gear limits. Two of these speakers requested co-management and co-stewardship opportunities like those that exist along the Kuskokwim River, which have allowed escapement goals to be met and for subsistence harvest. Several speakers noted that Tribes have taken on the burden of conservation in the region, with one speaker highlighting the self-imposed mortarium on fishing implemented by the Yukon Intertribal Fish Commission in 2014.

One participant requested an updated analysis from the Office of Subsistence Management, highlighting that more information needs to be included on the impacts to people of declining caribou and moose populations and the impacts to people of the past four years with no subsistence harvest on the Yukon River. Additionally, one participant also requested more communication and education efforts about the Special Action Request on local radios, newspapers, and in local communities.

### Summary of Tribal Consultation

A teleconferenced Tribal Consultation was held on March 21, 2024. Attendees included representatives from the following Tribas or Tribal Organizations: Native Village of Eagle, Algaaciq Native Village (St. Mary's), Council of Athabascan Tribal Governments, Nenana Native Association, Tanana Chiefs Conference, and Doyon Ltd.

Tribal representatives provided testimony supporting the special action request. Several Tribal representatives discussed their dependence on salmon runs and how restrictions and low run sizes have led to empty smokehouses and food insecurity. Additionally, low moose populations have also contributed to food insecurity in the Yukon Region. Concern was also expressed that the State does not take their subsistence and food security needs into consideration when making management decisions. Tribal representatives expressed frustration over bycatch and intercept fisheries. Participants spoke passionately about the need to save the salmon and conserve resources for future generations.

Participants also discussed Tribal co-stewardship and co-management. Tribal representatives stated costewardship and co-management are needed on the Yukon River because they lead to better management outcomes. Representatives provided examples of co-management resulting in escapement goals being met. Multiple questions were asked about how to set up an effective co-management structure.

### Summary of ANCSA Corporation Consultation

A teleconferenced ANSCA Consultation was held on March 21, 2024. Attendees included representatives from the following corporations: Calista Corporation, and Doyon Ltd. Several Tribal members also attended.

Participants used the consultation to ask questions about the special action request. Multiple questions focused on whether the special action request was related to the proposed seven-year moratorium on Chinook Salmon and if it would affect management. Other questions related to who is considered federally qualified subsistence users and who could fish in Federal waters if the special action is adopted by the Board.

## **Effects of the Proposal**

If this Special Action Request is approved, the Board will close Federal public waters of the Yukon River drainage to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users from June 1 through September 30, 2024. State of Alaska sport, commercial, and subsistence fisheries targeting Chinook, summer and fall Chum, and Coho salmon will be prohibited in Federal public waters during the Federal closure. Federal subsistence fishing schedules, openings, closures, and methods for federally qualified subsistence users of Yukon River drainage salmon will be determined by the Federal in-season manager. The Federal in-season manager will allow harvest opportunities for Chinook, summer Chum, fall Chum, or Coho salmon by special action when justified by run sizes and in accordance with Title VIII of ANILCA. Only federally qualified subsistence users who are permanent rural residents of the Yukon River drainage and Stebbins will be eligible to harvest Chinook, summer and fall Chum, and Coho salmon in Federal public waters. Residents of the Fairbanks

North Star Borough are not rural residents and therefore are not eligible to harvest Chinook, summer and fall Chum, and Coho salmon in Federal public waters during the closure.

If this Special Action Request is not approved, the Federal in-season manager will continue to coordinate with State managers to manage salmon subsistence fisheries in the Yukon River drainage, as required in the letter from the Board delegating specific management authorities and responsibilities to the Federal in-season manager (**Appendix 1**). The State may allow commercial harvest of summer Chum Salmon if the projected run size of summer Chum Salmon is large enough to support such harvest. Any commercial harvest will likely be limited to selective gear types due to conservation concerns for Chinook Salmon.

### **OSM CONCLUSION**

**Support** FSA24-01 with **modification** to allow the Federal in-season manager to lift a closure to the harvest of Chinook, summer Chum, fall Chum, or Coho salmon based on in-season run indicators of harvestable surplus beyond Federal subsistence harvests.

The modified regulation should read:

### 50 CFR 100.27(e)(3) Subsistence taking of fish—Yukon-Northern Area

(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060 [Emergency Orders]), unless superseded by a Federal Special Action.

Unless re-opened by the Federal in-season manager, Federal public waters of the Yukon River drainage are closed to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users, effective on June 1, 2024, through September 30, 2024. Federal subsistence fishing schedules, openings, closures, and fishing methods will be determined by the Federal Fisheries Manager.

#### Justification

Poor returns of Yukon River Chinook, Chum, and Coho salmon continued in 2023 with runs being at best below average and at worst among record lows. The run size of Chinook Salmon in 2023 was the second lowest recorded, only 2022 was lower. No escapement goals have been met for Chinook Salmon since 2019 and the Canadian escapement goal was not met for the fifth consecutive year. Chum Salmon runs have improved since hitting record lows in 2021 and most U.S. escapement goals were met in 2023. However, Chum Salmon runs were far below the 10- and 20-year averages and the Mainstem Canada and Fishing Branch River Canadian escapement goals for fall Chum Salmon were not achieved for the fourth and sixth consecutive years, respectively. The Coho Salmon run index was the second lowest recorded and escapement goals and treaty obligations even with severe restrictions and closures on commercial, sport, personal use, and subsistence harvests.

Yukon River subsistence salmon fisheries have been severely restricted since 2021, resulting in extreme hardships, food insecurity, and continued loss of cultural practices, particularly for upper river villages. No harvest opportunity was provided for Chinook Salmon in 2023 due to an extremely poor run. Subsistence harvest of summer Chum Salmon was allowed but methods were limited to less efficient selective gear types to protect Chinook Salmon. Subsistence harvest opportunities were also limited during the fall season due to a poor Canadian component of the fall Chum Salmon run and the Coho Salmon run returning weaker than expected. Finally, salmon run failures in 2024 will continue to negatively impact not only subsistence harvests but also traditional ways of life, and likely food insecurity, along the Yukon River. A closure to the harvest of Chinook, Chum, and Coho salmon by nonfederally qualified users and uses, based on ANILCA Section 815, is necessary for the conservation of healthy populations of Yukon Chinook, summer and fall Chum, and Coho salmon and to continue subsistence uses of these resources. However, if in-season indicators of run size project a harvestable surplus above that needed for subsistence, the Federal in-season manager may rescind the Board's closure, which is the purpose of the OSM modification to the special action request.

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### SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

#### Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

**Support FSA24-01** with **modification**. Leave open the portion of District 1 that includes the freshwaters draining into the Bering Sea between the Black River and the Naskonat Peninsula during times that salmon closures are in place. The Council's justification for the modification is that residents of Scammon Bay, Hooper Bay, and Chevak do not intercept Yukon River bound salmon and should not be subject to the same fishing restrictions as those along the Yukon. The Council otherwise supports a closure to non-federally qualified users due to conservation concerns for Yukon River salmon.

The modification should read:

#### 50 CFR 100.27(e)(3) Subsistence taking of fish—Yukon-Northern Area

(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060 [Emergency Orders]), unless superseded by a Federal Special Action.

Federal public waters of the Yukon River drainage, except inland waters in that portion of District 1 from the Black River drainage to the Naskonat Peninsula, are closed to the harvest of Chinook, summer and fall Chum, and Coho salmon except by federally qualified subsistence users, effective on June 1, 2024, through September 30, 2024. Federal subsistence fishing schedules, openings, closures, and fishing methods will be determined by the Federal Fisheries Manager.

#### Western Interior Alaska Subsistence Regional Advisory Council

**Support FSA24-01**. The Council recognizes that while there was not enough salmon in the Yukon River for the past several years to meet subsistence needs, in 2024 if there is enough salmon to warrant any subsistence opportunities the Federal in-season manager should take the lead to ensure that federally qualified rural subsistence users have priority on this resource.

#### Seward Peninsula Subsistence Regional Advisory Council

**Support FSA24-01**. The Council discussed how fishing being closed has caused hardships in the Yukon River. The Council supports the request to help fish populations in the area.

#### Eastern Interior Alaska Subsistence Regional Advisory Council

**Support FSA24-01**. The Council supports this special action request due to concerns about salmon populations in the Yukon River. Chinook Salmon are nearing extirpation, and we need to do everything we can to protect them. While there are unlikely to be openings this year, the Council nevertheless sees value in limiting the pool of eligible users.

# STATE OF ALASKA COMMENTS

None

#### **APPENDIX 1**



FISH and WILDLIFE SERVICE BUREAU of LAND MANAGEMENT NATIONAL PARK SERVICE BUREAU of INDIAN AFFAIRS

> In Reply Refer To: 23047

# **Federal Subsistence Board**

1011 East Tudor Road, MS 121 Anchorage, Alaska 99503-6199



FOREST SERVICE

APR 26 2023

Fisheries and Aquatic Resources Branch Manager U. S. Fish and Wildlife Service Northern Alaska Fish and Wildlife Field Office 101 12<sup>th</sup> Avenue, Room 222 Fairbanks, Alaska 99701

Dear Fisheries and Aquatic Resources Branch Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Northern Alaska Fish and Wildlife Field Office's Branch Manager for Fisheries and Aquatic Resources (Fisheries and Aquatic Branch Manager) to issue emergency and temporary special actions (special actions) if necessary to ensure the conservation of a healthy fish population, to continue subsistence uses of fish, for the continued viability of a fish population, or for public safety reasons. This delegation only applies to Federal public waters subject to the Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction in the Yukon River Drainage, including the Arctic National Wildlife Refuge.

It is the intent of the Board that Federal subsistence fisheries management by designated Federal officials be coordinated, prior to implementation, with the representatives from Regional Advisory Councils (Councils), the Office of Subsistence Management (OSM), and the Alaska Department of Fish and Game (ADF&G), to the extent possible. Managers will use OSM to ensure proposed actions are technically and administratively aligned with legal mandates and policies and to facilitate communication of actions. Federal managers are expected to work with managers from the State and other Federal agencies, Council Chair(s) and applicable Council members, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

#### DELEGATION OF AUTHORITY

1. <u>Delegation</u>: The Fisheries and Aquatic Branch Manager is hereby delegated authority to issue special actions affecting fisheries in Federal public waters as outlined under the Scope of Delegation below. A public hearing is required before implementing a temporary special action. A public hearing is recommended for an emergency special action, but it is not required. Special actions are governed by regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. <u>Authority:</u> This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

**3.** <u>Scope of Delegation</u>: The regulatory authority hereby delegated is limited to the issuance of special actions as defined by 36 CFR 242.19 and 50 CFR 100.19. An emergency action may not exceed 60 days and may not be extended through another emergency special action. A temporary special action may exceed 60 days but may not extend beyond the end of the current fisheries regulatory cycle.

This delegation permits you to issue special actions to open or close Federal subsistence fishing periods or areas provided under codified regulations, to specify methods and means, and to set harvest and possession limits for Federal subsistence fisheries.

This delegation also permits you to issue special actions to close and re-open Federal public waters to non-subsistence fishing, but it does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed fisheries.

This delegation may be exercised only when it is necessary to conserve healthy fish populations, to continue subsistence uses, for reasons of public safety, or to ensure the continued viability of populations.

In addition, you may issue special actions to open or close Federal public waters on transboundary rivers to the taking of fish for subsistence or non-subsistence uses to comply with the terms of the Pacific Salmon Treaty.

You are also permitted to specify permit conditions outside of the special action process, provided those permit conditions do not already appear in regulation, are not related to the take of fish, and are not related to areas or periods open to fishing. Permit conditions are not a substitute for the public process to generate regulations regarding take. You may not collect additional information from the public that has not been approved by the Office of Management and Budget (OMB).

All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public waters subject to this delegated authority are those within the Yukon River Drainage, including the Arctic National Wildlife Refuge (as described in the Subsistence

Management Regulations for the Harvest of Fish and Shellfish on Federal Public Lands and Waters in Alaska). You will coordinate all local fishery decisions with all affected Federal land managers.

 <u>Effective Period</u>: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

 <u>Guidelines for Review of Proposed Special Actions</u>: You will use the following guidelines to determine the appropriate course of action when reviewing proposed special actions.

a) Does the proposed special action fall within the geographic and regulatory scope of delegation?

b) Have you communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal subsistence regulations, and policy?

c) Does the proposed action need to be implemented immediately as a special action, or can the desired conservation or subsistence use goal be addressed by deferring the issue to the next regulatory cycle?

d) Does the supporting information in the proposed special action substantiate the need for the action?

e) Are the assertions in the proposed special action confirmed by available current biological information and/or by affected subsistence users?

f) Is the proposed special action supported in the context of available historical information on stock status and harvests by affected users?

g) Is the proposed special action likely to achieve the expected results?

h) Have the perspectives of the Chair or alternate of the affected Council(s), OSM, and affected State and Federal managers been fully considered in the review of the proposed special action?

i) Have the potential impacts of the proposed special action on all affected federally qualified subsistence users and non-federally qualified users within the drainage been considered?

j) Can public announcement of the proposed special action be made in a timely manner to accomplish the management objective? k) After evaluating all information and weighing the merits of the special action against other actions, including no action, is the proposed special action reasonable, rational, and responsible?

6. <u>Guidelines for Delegation</u>: You will become familiar with the management history of the fisheries in the region and be up to date with the current State and Federal regulations, management plans, and stock status, and harvest information.

You will provide subsistence users in the region a local point of contact about Federal subsistence fishery issues and regulations and facilitate a local liaison with State managers and other user groups. Consultation is not always possible for in-season management decisions and special actions; however, to the extent practicable, communication with stakeholders will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government to Government Tribal Consultation Policy (Federal Subsistence Board Government to Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claims Settlement Act Corporations 2015).

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 36 CFR 242.19 and 50 CFR 100.19, (2) if the request/situation falls within the scope of your delegated authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected subsistence uses and non-subsistence uses. Requests not within your delegated authority will be forwarded to the Board for consideration.

You will maintain a record of all special action requests and justification of your decisions. A copy of this record will be provided to the Administrative Records Specialist at OSM no later than 60 days after development of the document.

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning special actions being considered.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you may seek Council recommendations on the proposed special action. If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify Council representatives, the public, OSM, affected State and Federal managers, and law enforcement personnel. If an action is to supersede a State action not yet in effect, the decision will be communicated to Council representatives, the public, OSM, and State and Federal managers at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponents of the request immediately.

You may defer a special action request, otherwise covered by this delegation of authority, to the Board when the proposed management action will significantly impact a large number of Federal subsistence users or is particularly controversial. These options should be exercised judiciously and only when sufficient time allows. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated authority for the specific action only.

7. **Reporting:** You must provide to the Board, through the Assistant Regional Director for OSM, a report describing the pre-season coordination efforts, local fisheries management decisions, and post-season evaluation activities for the previous fishing season by November 15. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of the calendar year for presentation during regularly scheduled Council meetings.

Should you have any questions about this delegation of authority, please feel free to contact the Assistant Regional Director for OSM at toll-free 1-800-478-1456 or (907) 786-3888.

Sincerely,

Chritney Christ

Anthony Christianson Chair Federal Subsistence Board

Enclosures: Maps of the Yukon River Drainage, including the Arctic National Wildlife Refuge

cc: Federal Subsistence Board Office of Subsistence Management Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Western Interior Subsistence Regional Advisory Council Eastern Interior Subsistence Regional Advisory Council Superintendent, Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve Manager, Yukon Delta National Wildlife Refuge Superintendent, Denali National Park and Preserve Manager, Alaska Maritime National Wildlife Refuge Manager, Arctic National Wildlife Refuge Manager, Kanuti National Wildlife Refuge Manager, Koyukuk/Nowitna/Innoko National Wildlife Refuge Complex Manager, Tetlin National Wildlife Refuge Manager, Yukon Flats National Wildlife Refuge Field Manager, Bureau of Land Management, Northern District Office Steese National Conservation Areas and White Mountain National Recreation Area Assistant Regional Director, Law Enforcement U.S. Fish and Wildlife Service (Region 7)

Deputy Commissioner, Alaska Department of Fish and Game Interagency Staff Committee Administrative Record