

## **Interagency Staff Committee Comment**

**FSA22-01/02/03/04**

The Interagency Staff Committee (ISC) acknowledges the importance of concerns raised by the many voices along the Yukon River which include the proponents of Fisheries Special Action 22-01/02/03/04, the Regional Advisory Councils, those that participated in the public hearings, and the Tribes and Corporations that participated in consultation.

Significant changes have occurred since the Federal Subsistence Board last acted on similar special action requests in 2015. The 2021 Yukon River drainage-wide run sizes of Chinook, summer Chum, and fall Chum salmon were some of the lowest on record resulting in a closure to subsistence salmon fishing throughout the river last season. This had devastating effects on families that rely on Yukon River salmon for subsistence.

It is clear there was support from all four Regional Advisory Councils with customary and traditional use determinations for salmon to close 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. It is also clear from other rural residents of the Yukon River who testified at public hearings, Tribal Consultations, and at Regional Advisory Council meetings that there are concerns, as well as opposition to this proposed action.

The Yukon River requires intensive inseason salmon management due to varying run sizes and timing, the complexity and interaction of the fisheries, and difficulties in accurately assessing inseason run strength. Uncertainty has periodically led to inequity of harvest, wherein some portions of the Yukon River drainage were open when harvestable surpluses were projected, while others were closed once new data indicated escapement goals might not be met. For the most part, however, cooperative federal and state managers have worked together with Yukon River fishing families to promote fairness and equity in subsistence fishing along the entire Yukon River drainage, something rural residents from the Yukon River have repeatedly requested.

The 2022 outlook is poor for Chinook, summer Chum and fall Chum, and Coho salmon with subsistence fishing closures and restrictions expected. Sport fishing, personal use, and commercial fisheries are also expected to be closed for salmon all season. Inseason assessment indicators and management confidence will determine if subsistence fishing for salmon will remain closed or conversely, if confidence is high, and escapement is likely to be met, subsistence salmon fishing opportunities with selective gear may be allowed. Regardless, if Federal public waters are closed to non-Federally qualified users by either the Board through this temporary special action request or by the Federal inseason manager through delegated authority to issue emergency special actions to open or close subsistence fishing periods or areas provided under codified regulations, management of state waters would be unaffected. The patchwork nature of land ownership along the Yukon River is what led to coordinated management and consensus-based decision-making over the past 20 years. Parallel inseason management actions and joint news releases have minimized duplication of effort that may have resulted through separate implementation of Federal and State management actions along the Yukon River.

There are many compounding factors that are contributing to low salmon returns. Failure to meet summer Chum and fall Chum salmon escapement and harvest goals the past two seasons has been due to record low runs. Even though salmon harvest by non-Federally qualified users is small when compared to the overall harvest by rural Yukon River residents and their family members, the Board may consider actions to ensure the conservation and continued viability of healthy salmon populations, and when possible, to ensure the continued subsistence uses of Yukon River salmon.

If the Board decides to implement a closure, it may be prudent for Board members to focus on how best to address the concerns identified by the proponents of the special action request, as well as the effects of the special action request on fishing families, traditional subsistence practices, established management protocols and communications, plus the lack of clarity around how jurisdictional issues of Federal and State waters will affect fisheries and enforcement of those fisheries.