Subject: Draft Special Action Request to the FSB: Coho Salmon management within Yukon Delta NWR

Dear Mr. Tim Towarak, Chair Federal Subsistence Board

The Kuskokwim River is currently experiencing a very poor run of coho salmon as documented in the August 2015 information packet (http://www.adfg.alaska.gov/static-f/fishing/PDFs/commercial/krsmwg/08_19_15_infopacket.pdf). This season, the ADF&G in-season manager has implemented two commercial fishing periods harvesting more than 50,870 coho salmon. Subsistence harvest of coho salmon is ongoing and not yet complete.

This Special Action Request asks the Federal Subsistence Board to take action necessary to assume management of coho salmon to provide reasonable certainty that: (1) the established coho escapement goal within the federal conservation unit will be achieved and; (2) reasonable opportunity and priority use of subsistence salmon resources necessary to meet customary subsistence needs throughout the watershed per ANILCA Section 804 occurs. It is critically important that Chinook salmon actions enacted by federal and state managers provide reasonable opportunity to harvest other species of salmon to compensate for the lack of opportunity to harvest Chinook salmon.

Of paramount concern to us as subsistence users is the evidence of the probability, based on the best available information, that the established SEG escapement goal for the Kwethluk River watershed within the Yukon Delta NWR is likely to not be achieved in 2015 as a result of recent management actions (see http://www.adfg.alaska.gov/static-f/fishing/PDFs/commercial/krsmwg/08_19_15_infopacket.pdf).

Currently, escapement to the Kwethluk River for this date is the lowest on record. In the Aug. 19, 2015 Info. Packet, ADF&G staff states that for the Kwethluk River: "In-season projections currently indicate that the coho salmon escapement goal may not be met." Analysis by USFWS Fishery biologist Ken Harper, (see below and attached) provides additional evidence of the reasonable probability that the escapement goal to the Kwethluk River, essential for sustainability of future salmon runs and subsistence harvests, will not be met.

Despite these documented conservation concerns, and ADF&G's statement about their in-season projection for the Kwethluk River, the ADF&G has stated their intention to **provide another commercial fishing period within the Refuge this Friday, Aug. 21**. Therefore, we ask the FSB and OSM for expedited review and consideration of this request.

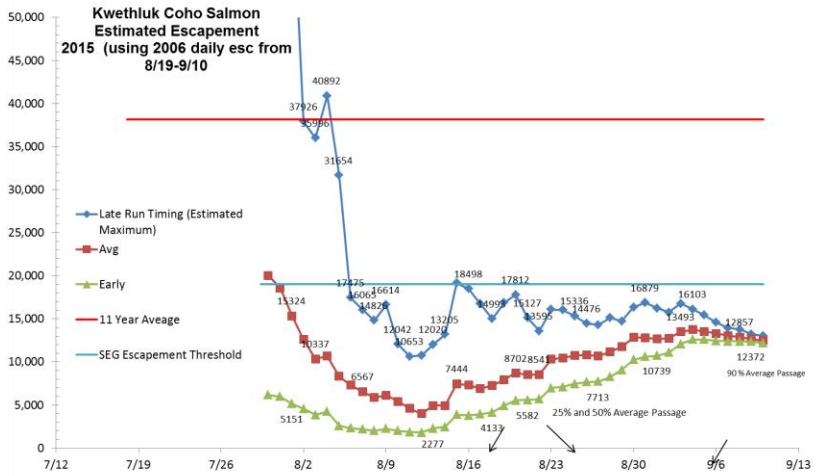
We also want to remind the FSB that the Special Action Request from Lower Kalskag (FSA15-08) had previously requested federal oversight and management of ALL salmon species, not just Chinook salmon. An explanation for avoiding this action was not forthcoming despite the heightened dependence on coho salmon by Kuskokwim residents.

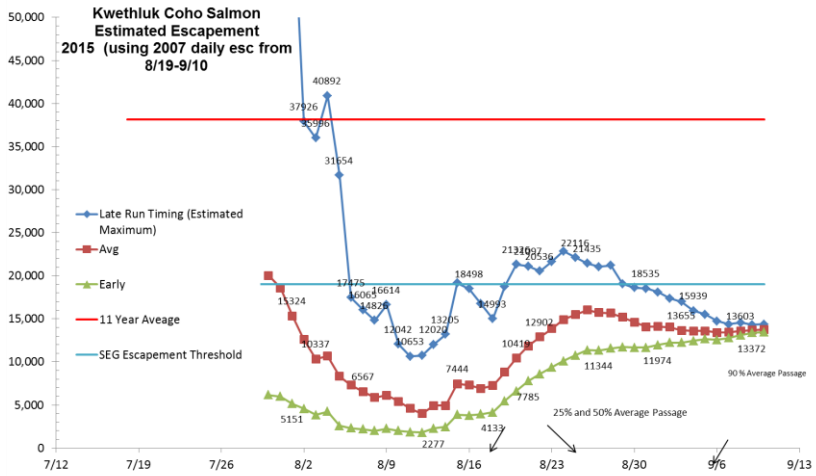
We will be making a similar request to the Yukon Kuskokwim Wildlife in-season manager.

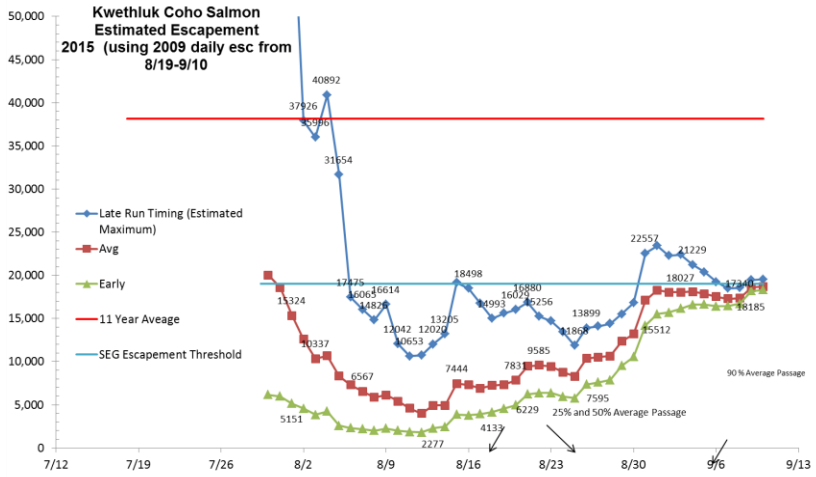
Sincerely,

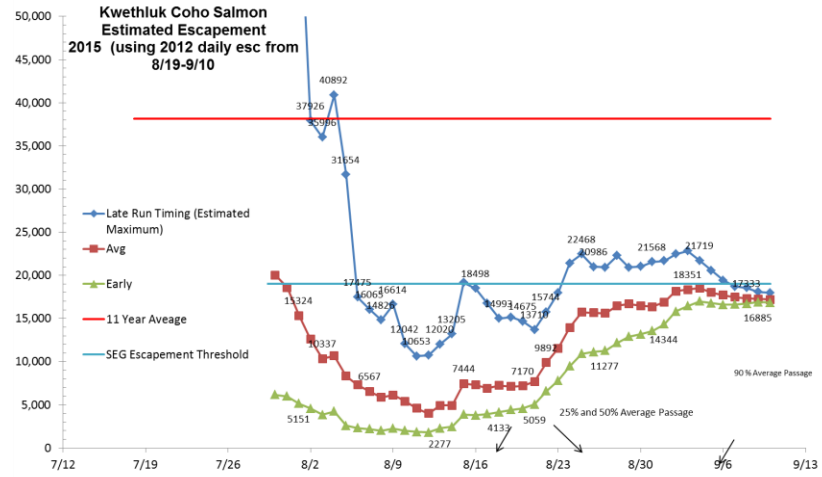
Lisa Fyerolson
Crow Village AK
8/19/2015

David G. Diehl 8/19/2015
(David G. Diehl-Aniak, AK)









Predicted escapements for the Kwethluk River using historical daily escapements from 8/19-9/10 for years 2006, 2007, 2009, and 2012 (see graphic on page 2). (Ken Harper USFWS)

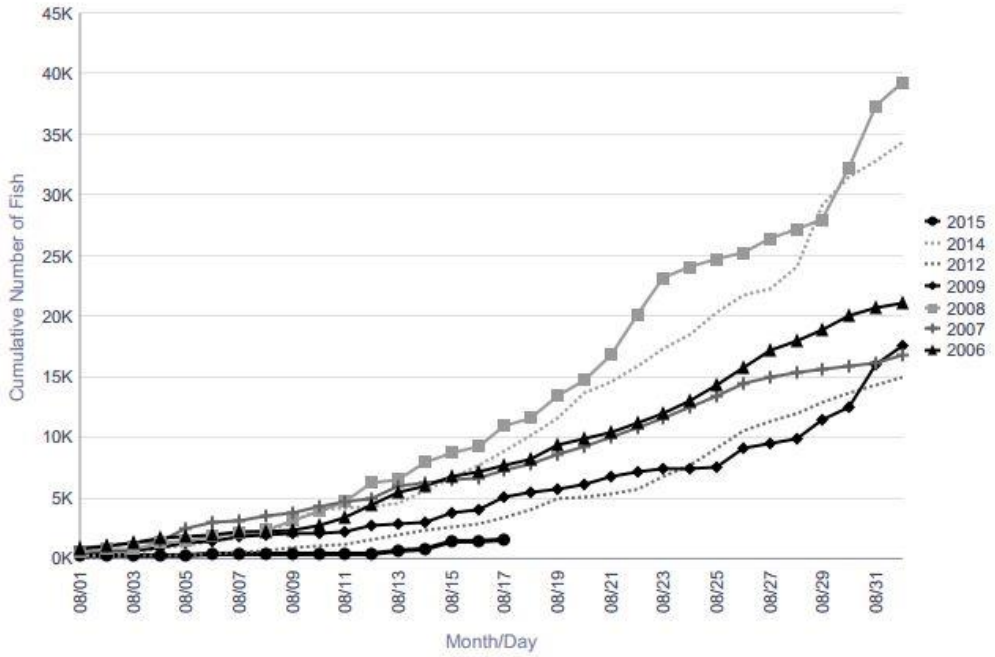
Kwethluk River Weir Historical Cumulative Daily Passage of Coho Salmon

	Cumulative Daily Passage									
Date	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
08/15	6,772	6,463	8,679	3,833			2,583		6,667	1,425
08/16	7,133	6,679	9,266	4,082			2,888		7,634	1,507
08/17	7,712	7,276	11,003	5,133			3,339		8,817	1,604
08/18	8,266	7,870	11,544	5,462			4,038		10,156	
08/19	9,330	8,585	13,440	5,745			4,929		11,554	
08/20	9,870	9,293	14,657	6,071			5,149		13,662	
08/21	10,461	10,023	16,727	6,814			5,330		14,570	
08/22	11,228	10,765	20,173	7,136			5,679		15,863	

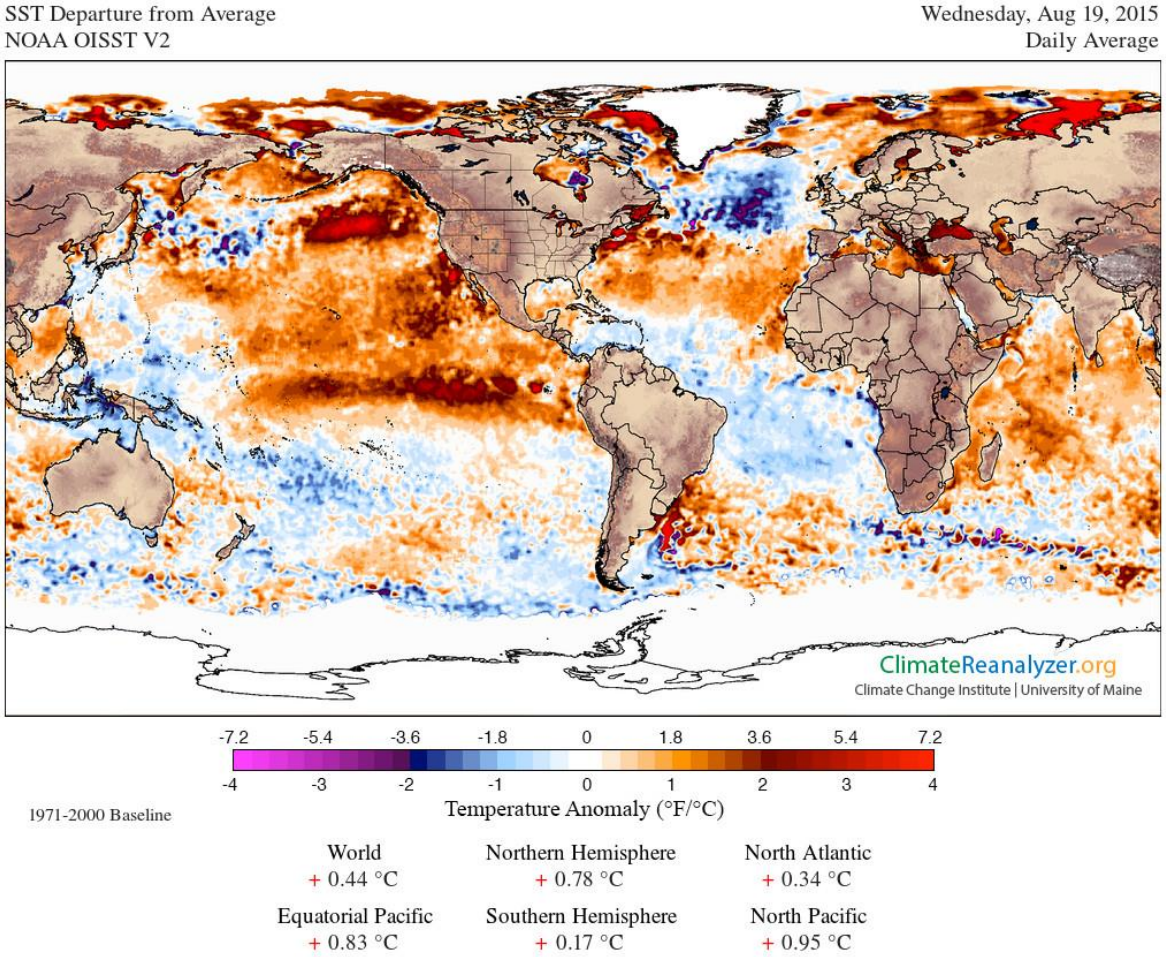
Escapement Goal Range: > 19,000
Highlighted years below are when escapement goal was achieved or exceeded.

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Season Total	25,667	19,473	48,049	21,911			20,895		43,945	

Kwethluk River Coho



There are no comments for the past three days.

Sea Surface T Anomaly

http://cci-reanalyzer.org/DailySummary/