USFWS Fishery Manager's comments on Yukon Board of Fisheries proposals 15 to 17

PROPOSAL 15 – Support with amendments

5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan

The USFWS supports mainstem fall chum closures to aid stock rebuilding but does not support the multi-year approach nor the timeline for implementation ("trigger") for closures as written in this proposal.

Suggested amendments: **If the inseason projection for Canada-bound fall chum run size is below the US/Canada Mainstem Interim Management Escapement Goal, implement fall chum harvest closures starting July 16 (regulatory start of fall season in the Coastal District and District 1**), and roll closures upriver as fish migrate.

Comments:

The Interim Management Escapement Goal (IMEG) for mainstem Canada-bound fall chum (currently set at 70,000-104,000) is biologically based and set by the Yukon River Panel process using the best available data. It is important to meet escapement goals and to have mainstem fall chum closures in place whenever the run size is projected to fall below the IMEG. If the run size exceeds established escapement goals, extra fish on the spawning grounds could be beneficial within the ecosystem. However, it is worth considering the high trade-off of keeping closures in place and having foregone subsistence harvest in communities facing food security issues. Multi-year closures do not give fishery managers the flexibility to allow subsistence harvest if the productivity of the run improves and goals will be exceeded.

The "trigger" for enacting the closures, as proposed "when these stocks are detected at Lower Yukon Test Fishing site (LYTF) in DISTRICT 1", would be challenging to carry out from an assessment and management standpoint. Managers are unable to detect the first true fall chum in real time, and fall chum are not reliably identified visually. Chum samples are taken at the Pilot Station sonar test fishery, not LYTF, because they use a more varied suite of nets. Samples are collected over multiple days, grouped, and shipped to Anchorage for mixed stock genetic analysis (MSA), which tells us the proportion of stocks for that sampling period only.

Since chum genetic testing began (from 2008 onwards), fall chum have been detected in the first group of samples each year. Using MSA from 2008–2024, on average, roughly 4% of the fall chum salmon may pass through the lower river during the summer season (June 1 to July 15). However, the summer chum make up roughly 98% of the run during that time, and subsistence harvest would be dominated by summer chum. We don't see these proportions shift significantly until the regulatory fall season start date (which begins July 16 in District 1 and moves upriver

based on fall chum migration). Closing the fishery upon "detecting the first fall chum" could result in a complete harvest closure for summer chum. This could result in large foregone harvests of summer chum which are vital to thousands of households. A preferred management trigger for implementation of fall chum closures is the regulatory "fall season" dates lined out in the Fall chum salmon management plan, which move upriver based on run timing. The suggested amendments would align the proposal with current management and assessment framework and ANILCA Title VIII subsistence priorities, by eliminating the possibility of significant foregone subsistence chum harvest in years when the summer chum run exceeds the drainage-wide escapement goal.

PROPOSAL 15: AS AMENDED (inserted language is bold and underlined, [REMOVED LANGUAGE IS ALL CAPS IN BRACKETS]**:**

5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan.

If the inseason projection for Canada-bound fall chum run size is below the U.S./Canada Mainstem Interim Management Escapement Goal, [PLACE A 2-YEAR CLOSURE ON HARVEST OF YUKON RIVER FALL CHUM SALMON, AS FOLLOWS:] close harvest of Yukon River Mainstem Fall Chum Salmon **beginning July 16 in the Coastal District and District 1** [WHEN THESE STOCKS ARE DETECTED AT LOWER YUKON TEST FISHING SITE (LYTF) IN DISTRICT 1]. Walk the closures up river through fishing District 1-5 as fish **migrate** [ENTER EACH DISTRICT]. Reopen mainstem fishing progressively up river as Fall Chum end of the run has moved through each District. [THESE CLOSURES MUST BE IN EFFECT FOR 2 YEARS TO ALLOW FULL POTENTIAL OF FALL CHUM TO JUMP START REBUILDING EFFORTS.]

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PROPOSAL 16 – Support with amendments

5 AAC 01.249. Yukon River Drainage Fall Chum Salmon Management Plan

USFWS supports further restrictions to 4-inch and smaller gillnets within the in-river migration corridor during low salmon run abundance but does not support the multi-year approach nor the timeline for implementation ("trigger") for closures as written in this proposal.

Suggested amendments: **If the inseason projection for Canada-bound fall chum run size is below the U.S./Canada Mainstem Interim Management Escapement Goal, close the mainstem Yukon River to the use of all gillnets … beginning July 16 in the Coastal District and District 1** and roll closures upriver as fish migrate.

Comments:

For many years Yukon fishermen have explained that drop-out mortality is likely occurring in 4-inch gear. While the number of fish dropping out cannot be quantified, the effects could be significant when even a few thousand fish making it to the spawning grounds might make the difference for future survival of the run.

The 2020–2024 average annual subsistence harvest in 4-inch set gillnets is 6,588 summer chum and 487 Chinook. The 2021–2024 average reported subsistence harvest during fall season closures is 1,352 fall chum. Although the proportion of these fall chum caught in 4-inch set gillnets is currently unknown, we assume some harvest does occur in this gear given the reported harvest of Chinook and summer chum in 4-inch gillnets and the increase in some areas of the river of reported harvests of fall chum, despite closures.

While we need to balance providing subsistence harvest opportunity for non-salmon, we also need to sufficiently limit incidental harvest and dropout mortality of fall chum salmon. In recent years, 4-inch and smaller gillnets were the only lethal fishing gear that have been allowed to target mainstem non-salmon during salmon closures. Due to the harvest and mortality concerns listed above, in 2025, managers placed 4-inch set gillnets on a weekend schedule for the entire fall season. Even with a reduced schedule, harvests and mortalities likely occurred, and further closures of this gear are warranted. While this restricts some subsistence harvest on whitefish and non-salmon species, other selective gear types (hook and line, dip nets, manned fish wheels, beach seines) often remain open 24 hours per day, 7 days a week for non-salmon, and 6-inch and smaller mesh gillnet opportunities can be provided in lakes and non-salmon streams.

The current proposal suggests the following management trigger for removal of 4-inch gillnets, "starting when Fall Chum salmon are detected at Lower Yukon Test Fishery (LYTF) in DISTRICT 1". Please see explanations in Proposal 15 discussion regarding the limitation of this approach. We suggest implementing these gillnet closures at the start of the fall season dates in the Coastal District and District 1, as this should sufficiently protect the bulk of the fall chum run.

The Interim Management Escapement Goal (IMEG) for mainstem Canada-bound fall chum (currently set at 70,000-104,000) is biologically based and set by the Yukon River Panel process using the best available data. It is important to meet escapement goals and to have mainstem fall chum closures in place whenever the run size is projected to fall below the IMEG. If the run size exceeds established escapement goals, extra fish on the spawning grounds could be beneficial within the ecosystem. However, it is worth considering the high trade-off of keeping closures in place and having foregone subsistence harvest in communities facing food security issues. Multi-year closures (or "one full life cycle" as proposed) do not give fishery managers the flexibility to allow subsistence harvest if the productivity of the run improves and goals will be exceeded. Requiring mainstem gillnet closures until escapement goals are met for four consecutive years could unnecessarily restrict subsistence harvests of multiple species in years when goals will be exceeded and a harvestable surplus of fish is available, or when there is no longer a conservation concern, which is inconsistent with ANILCA Title VIII subsistence priorities.

PROPOSAL 16: AS AMENDED (inserted language is bold and underlined,
[REMOVED LANGUAGE IS ALL CAPS IN BRACKETS]**:**

5 AAC 01.249I. Yukon River Drainage Fall Chum Salmon Management Plan.

If the inseason projection for Canada-bound fall chum run size is below the U.S./Canada Mainstem Interim Management Escapement Goal, close the mainstem

Yukon River to the use **of all** [4" OR LESS MESH] gillnets for fall chum salmon conservation **beginning July 16 in the Coastal District and District 1** [, AS FOLLOWS: THE USE OF 4" MESH GILLNETS SHALL BE CLOSED ON THE YUKON RIVER MAINSTEM, STARTING WHEN FALL CHUM SALMON ARE DETECTED AT LOWER YUKON TEST FISHERY (LYTF)] in **the Coastal District and** District 1 with subsequent closures walked up river through fishing District 1-5 as fall chum **migrate** [ENTER EACH DISTRICT].

Reopen mainstem fishing to 4" mesh gear progressively up river as Fall chum tail end of the run has moved through each District.

[THESE CLOSURES SHOULD BE IN EFFECT UNTIL MAINSTEM FALL CHUM HAVE ACHIEVED CURRENT ESCAPEMENT GOALS 75,000-115,000 FOR ONE LIFE CYCLE, DEFINED AS 4 YEARS. THIS IS TO ALLOW FULL POTENTIAL OF FALL CHUM TO JUMP START LONG TERM REBUILDING EFFORTS.]

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PROPOSAL 17 - Support with amendments

5 AAC 01.220. Lawful gear and gear specifications

USFWS supports this proposal as it incorporates Traditional and Ecological Knowledge (TEK) of whitefish harvest areas, is responsive to Traditional non-salmon harvest practices, and is in balance with the need for salmon conservation in the mainstem and other salmon migration areas.

Suggested amendments: Allow the use of 6" or less mesh gillnets during times of salmon conservation **to target non-salmon in fall season** as follows…..Gillnets must be 60 feet or less in length and at least ~~300'~~ **500'** upstream from the mouth.

Comments:

Non-salmon fishing plays a critical role in the Yukon Area, particularly during the fall and winter seasons. However, recent fall chum and coho closures have reduced subsistence users' ability to harvest non-salmon species using larger mesh sizes which are preferred for catching the larger whitefish.

In response to public testimony, managers conducted a comprehensive review of known spawning areas and in-river migration corridors for Chinook, coho, and chum salmon. This review utilized TEK, the Anadromous Waters Catalog, and peer-reviewed scientific literature. Following the review, areas not identified as salmon spawning or transit zones were designated as non-salmon harvest areas, and detailed maps were created for the entire Yukon Area. In coordination with ADF&G, these designated non-salmon harvest areas were opened 24 hours a day, 7 days a week beginning August 17, 2025, to 6-inch or smaller set gillnets to provide non-salmon subsistence opportunities while maintaining salmon closures in in-river salmon migration and spawning areas.

The three locations identified in this proposal were confirmed as non-salmon areas during the review process and included in the non-salmon harvest areas opened from August 17 until the end of fall season in 2025. We support this proposal with minor amendments. The first would be to give the managers the flexibility to extend this harvest opportunity earlier or later than the proposed dates, during fall season, and we also recommend the closures match the common state regulatory closure of a 500-feet setback from the mouth. As salmon migrate past creeks or smaller streams, they will turn into them briefly sometimes before finding their way back out. A 500-feet setback ensures that fishers are less likely to catch salmon that are meant to be migrating past and prevents fishing at the mouth in a way that allows the net to extend into a closed area, which may cause conflict with law enforcement.

PROPOSAL 17: AS AMENDED (inserted language is bold and underlined, [REMOVED LANGUAGE IS ALL CAPS IN BRACKETS]**:**

5 AAC 01.220. Lawful gear and gear specifications.

Allow the use of 6" or less mesh gillnets during times of salmon conservation **to target non-salmon in fall season** as follows: In Hamilton Slough, Anen'eq River (Unuk River), and Ingricuar River, set gillnets of six inch or smaller mesh may be used [FROM SEPTEMBER 1 TO SEPTEMBER 30]; gillnets must be 60 feet or less in length and at least **500'** [300'] upstream from the mouth.