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FEDERAL SUBSISTENCE BOARD

WORK SESSION

U.S. FISH AND WILDLIFE BUILDING  
Anchorage, Alaska  
April 15, 2024

MEMBERS PRESENT:

- Anthony Christianson, Chair
- Charles Brower, Public Member
- Rhonda Pitka, Public Member
- Jill Klein, U.S. Fish and Wildlife Service
- Sarah Creachbaum, National Park Service
- Steve Cohn, Bureau of Land Management
- Glenn Chen, Bureau of Indian Affairs
- Greg Risdahl, U.S. Forest Service

Ken Lord, Solicitor's Office

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Computer Matrix Court Reporters, LLC  
329 F Street, Suite 222  
Anchorage, AK 99501  
907-227-5312; sahile@gci.net

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P R O C E E D I N G S

(Teams Teleconference - 4/15/2024)

(On record)

MS. HOWARD: And, Tony, with your permission I will jump in. First I want to make sure that Nathan has us recording, as court reporter.

NATHAN: Yeah, you're good.

CHAIRMAN CHRISTIANSON: Okay, you're good.

MS. HOWARD: Thanks Nathan. Thanks Tony. Okay, so we'll go through roll call. First up Public Member Rhonda Pitka.

MS. PITKA: Hi. I'm not sure if you can hear me but I'm on.

MS. HOWARD: Can hear you nice and clearly, Rhonda, thank you.

Public Member Charlie Brower.

MR. BROWER: (In Native)

MS. HOWARD: Good afternoon, Charlie, thank you.

Glenn Chen for the Bureau of Indian Affairs.

MR. CHEN: I'm here.

MS. HOWARD: Hi, Glenn, thank you.

Steve Cohn for Bureau of Land Management.

MR. COHN: Good afternoon, I'm here.

MS. HOWARD: Hi, Steve.

MR. COHN: Yes.

MS. HOWARD: Jill Klein for Fish and

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1 Wildlife Service.

2

3 MS. KLEIN: Good afternoon, this is  
4 Jill Klein. I'm online.

5

6 MS. HOWARD: Hi, Jill, thank you.

7

8 Sarah Creachbaum for the National Park  
9 Service.

10

11 (No comments)

12

13 MS. HOWARD: We'll come back to Park  
14 Service.

15

16 Greg Risdahl for U.S. Forest Service.

17

18 MR. RISDAHL: Hi, Ameer, yes, this is  
19 Greg Risdahl here. I will be sitting in for Chad  
20 VanOrmer today. Thank you.

21

22 MS. HOWARD: Thank you, Greg.

23

24 We'll go to legal counsel, Department  
25 of the Interior, Solicitor's Office, Ken Lord.

26

27 MR. LORD: Good morning everyone, I'm  
28 here.

29

30 MS. HOWARD: Good morning, Ken.

31

32 MR. LORD: Good morning, or afternoon.

33

34 MS. HOWARD: Afternoon.

35

36 MR. LORD: Yep.

37

38 MS. HOWARD: It's all Monday. Hi, Ken.  
39 From USDA's Office of General Counsel, do we have  
40 Boykin Lucas on.

41

42 MR. LUCAS: Good afternoon, yes, I'm  
43 also on the line.

44

45 MS. HOWARD: Hi, Boykin.

46

47 We'll move into Liaisons to the Board  
48 from our Regional Advisory Council Chairs. Raymond  
49 Oney from Yukon Kuskokwim Delta RAC.

50

0004

1 MR. ONEY: Good afternoon, Raymond Oney  
2 here.

3  
4 MS. HOWARD: Good afternoon, Raymond.  
5

6 Charlie Wright from our Eastern  
7 Interior Regional Advisory Council.  
8

9 MR. WRIGHT: Hello.  
10

11 MS. HOWARD: Hi, Charlie, I think I  
12 heard you. Then for Western Interior representing the  
13 Council is Council Coordinator, Nissa Pilcher.  
14

15 MS. PILCHER: Present.  
16

17 MS. HOWARD: Hi, Nissa.  
18

19 For Seward Peninsula Regional Advisory  
20 Council being represented by Gisela Chapa for Council  
21 Coordination. Gisela.  
22

23 MS. CHAPA: Hi. Good afternoon,  
24 everyone.  
25

26 MS. HOWARD: Thank you, Gisela.  
27

28 Our Liaisons to the Board from State of  
29 Alaska. Deputy Commissioner Ben Mulligan.  
30

31 MR. MULLIGAN: Present.  
32

33 MS. HOWARD: Hi, Ben. And Mark Burch.  
34

35 (No comments)  
36

37 MS. HOWARD: Let's go back up to  
38 National Park Service, Sarah Creachbaum.  
39

40 MS. CREACHBAUM: Good afternoon, Anee,  
41 this is Sarah, I'm here.  
42

43 MS. HOWARD: Hi, Sarah, good afternoon.  
44

45 Mr. Chair, Tony Christianson.  
46

47 CHAIRMAN CHRISTIANSON: Yes, I'm here.  
48

49 MS. HOWARD: All right. With that, Mr.  
50



0006

1 submitted by the Yukon River InterTribal Fish  
2 Commission. The Commission is asking the Board to  
3 uphold the conservation and priority consumptive use  
4 provisions under Title VIII of ANILCA, and to uphold  
5 the Yukon River Salmon Agreement by reassuming  
6 management of Yukon River chinook, chum, and coho  
7 salmon throughout the 2024 season. It's requesting the  
8 Board do this by:

9  
10 1. Closing Federal waters of the Yukon  
11 River drainage to the harvest of chinook, chum, and  
12 coho salmon except by Federally-qualified subsistence  
13 users in 2024, and

14  
15 2. Requiring Federal subsistence  
16 schedules fishing schedules, openings, closures and  
17 methods within Federal waters be determined by the  
18 Federal Fisheries Manager.

19  
20 The proponents justification for this  
21 request is detailed. To summarize, Yukon River  
22 chinook, chum and coho salmon populations have steeply  
23 declined resulting in a failure to meet applicable  
24 escapement goals and treaty obligations in recent  
25 years. Subsistence opportunity for salmon has been  
26 severely restricted and subsistence salmon needs are  
27 not being met. Needs are unlikely to be met in 2024  
28 based on pre-season forecasts and recent years run  
29 strength. Salmon runs have not improved since the  
30 Board approved a similar special action request in  
31 2022. Any Federal management actions to open or close  
32 subsistence fishing in Federal waters of the Yukon  
33 River must uphold provisions of ANILCA and the Yukon  
34 River Salmon Agreement. The proponents stated they are  
35 very concerned with the precedent in 2023 wherein the  
36 actions of the Federal Manager were solely reactive to  
37 management actions by the State of Alaska. The  
38 proponent also stated preemptive closure of Federal  
39 waters to non-Federally-qualified users and uses and  
40 assumption of Federal management is both warranted and  
41 required as necessary for the conservation of declined  
42 populations of Yukon River salmon while providing  
43 reasonable and sustainable subsistence harvest based on  
44 Section .815 of ANILCA.

45  
46 So there we have a summary of the  
47 proponents justification for submitting the special  
48 action request. I'll pass it over to Pippa to describe  
49 subsistence uses of users in the Yukon River drainage.  
50

0007

1 MS. KENNER: Thank you, Cory. There  
2 are 48 villages, about 14,000 people that rely on Yukon  
3 River salmon as a primary subsistence resource. These  
4 villages represent seven distinct cultural groups from  
5 Yup'ik in lower river to Gwich'in in the upper river.  
6 Salmon subsistence harvest typically reflect the salmon  
7 species that are most abundant locally, although other  
8 factors such as run timing, flesh quality, food  
9 preference and number of dogs to feed also contribute  
10 to harvest patterns. Even though communities tend to  
11 harvest certain species of salmon more than others, the  
12 harvest of the mix of salmon species is a drainage-wide  
13 pattern and an important subsistence strategy,  
14 particularly in years when certain species have low  
15 abundance but others are prevalent.

16  
17 These villages that rely on Yukon River  
18 drainage salmon have been adapting to reductions in  
19 salmon fishing opportunity over several decades,  
20 however, salmon subsistence harvest estimates since  
21 2019 are by far the lowest in the historical record and  
22 Federal Disaster Declarations were declared for Yukon  
23 salmon every year since 2019. Few opportunities to  
24 subsistence fish for salmon have been allowed and  
25 commercial fisheries have been closed. Additionally, a  
26 Federal Disaster Declaration was issued for the spring  
27 flooding along the Yukon that occurred in May 2023 when  
28 many fish camps were flooded and smokehouses and fish  
29 racks were damaged or destroyed.

30  
31 So for 2023 preliminary harvest  
32 estimates are approximately 1,300 chinook salmon,  
33 27,000 summer chum salmon, 7,000 fall chum salmon and  
34 1,500 coho salmon. For comparison, the recent 10 year  
35 average estimated harvest were approximately 17,500  
36 chinook salmon, 64,000 summer chum salmon, 60,000 fall  
37 chum salmon and 7,000 coho salmon.

38  
39 Overall about 100,000 fewer salmon were  
40 harvested in 2023 compared to the recent 10 year  
41 average.

42  
43 For 2023 preliminary harvest estimates  
44 are only a quarter, 25 percent, of the recent 10 year  
45 average harvest in the salmon subsistence fishery.

46  
47 The loss of commercial fisheries have  
48 also affected subsistence users. When commercial  
49 fishing is not possible villages have difficulty  
50

0008

1 obtaining gear and gasoline necessary for subsistence  
2 fishing and hunting, paying power bills or buying food,  
3 thereby, worsening possible food insecurity created by  
4 crashing salmon runs. Beyond impacts to local  
5 economies in terms of both cash income and food  
6 insecurity, the salmon crashes have affected villagers  
7 sense of well-being and cultural meaning. The strong  
8 relationship between salmon and well-being of people is  
9 well documented. In the villages everyone has intimate  
10 knowledge of salmon and these salmon run crashes have  
11 affected everybody from elders to young children.  
12 People are shocked and alarmed by the salmon run  
13 crashes they are currently experiencing.

14  
15 I'm going to hand it back over to Cory  
16 to give you some biological information.

17  
18 MR. GRAHAM: Thank you, Pippa. In  
19 general, the trend of poor run sizes of Yukon River  
20 salmon continued last year. The chinook salmon run in  
21 2023 was the second lowest on record, only 2022 run  
22 size was lower.

23  
24 Because.....

25  
26 (Pause)

27  
28 MR. GRAHAM: Okay. So because of the  
29 low run size no escapement goals were met for chinook  
30 salmon and escapement goals have not been met since  
31 2019 for this species. The estimate of Canadian origin  
32 chinook salmon escapement into Canada was the second  
33 lowest on record and the Canadian escapement goal was  
34 not met for the fifth consecutive year.

35  
36 Runs of both summer and fall chum  
37 salmon improved since hitting record lows in 2021 but  
38 the 2023 runs were still among the lowest on record.  
39 However, some escapement goals were met because of  
40 improved run sizes.

41  
42 For summer chum salmon the drainage-  
43 wide goal was met in 2023. The other two escapement  
44 goals were not, but both projects had incomplete counts  
45 due to poor environmental conditions and missed  
46 sampling days. For fall chum salmon all three U.S.  
47 based escapement goals were met, however, the two  
48 Canadian based goals were not. The Canadian component  
49 of the fall chum salmon run has been weak since the  
50



0009

1 start of the salmon declines and it's likely why the  
2 Canadian goals were not met when the U.S. goals were.  
3 The coho salmon run size index was poor in 2023 and was  
4 the second lowest on record. Coho salmon no longer  
5 have any established escapement goals in the Yukon  
6 River but escapement goal estimates were below average  
7 in 2023.

8

9 I'll now discuss outlooks for the 2024  
10 season. The information I'm about to present is not in  
11 the analysis because it was published after we  
12 finalized the analysis.

13

14 In general the poor run sizes are  
15 forecasted to continue in 2024. For chinook salmon the  
16 drainage-wide forecast is for 45,000 to 68,000 fish.  
17 The forecast suggests a chinook salmon run like last  
18 year, which was the second lowest on record and did not  
19 meet any escapement goals. The forecast for Canadian  
20 origin chinook salmon is 19,000 to 28,000 and the  
21 Border passage projection is 9,000 through 19,000 fish.  
22 Given this information the Border passage objective of  
23 71,000 chinook salmon is unlikely to be met in 2024.

24

25 For summer chum salmon the forecast is  
26 550,000 to 1.8 million fish. This forecast indicates  
27 the summer chum salmon run is likely to meet the  
28 drainage-wide escapement goal.

29

30 For fall chum salmon the drainage-wide  
31 forecast is 263,000 to 474,000 fish. The drainage-wide  
32 goal may or may not be achieved based on this forecast.

33

34 The midpoint of the forecasted  
35 drainage-wide run size would be the sixth smallest run  
36 size on record.

37

38 For mainstem Canada fall chum salmon  
39 the forecast is 39,000 through 71,000 fish. The  
40 mainstem Canada escapement goal is unlikely to be met  
41 given the forecast and weak Canadian abundance in  
42 recent years.

43

44 The forecast for the Fishing Branch  
45 River fall chum salmon stock, the other Canadian based  
46 stock is 11,000 to 19,000 fish. The associated  
47 escapement goal is unlikely to be met based on this  
48 forecast.

49

50

0010

1                   The coho salmon run is anticipated to  
2 be below average and coho do not have any established  
3 escapement goals in the drainage.

4  
5                   Now, I'll provide a summary of the  
6 testimony provided at the public hearings.

7  
8                   A public hearing was held on March  
9 20th, 2024. 12 individuals provided testimony with  
10 some speakers representing the Native Village of Eagle,  
11 the Yukon River InterTribal Fish Commission and the  
12 Yukon Kuskokwim Regional Advisory Council. All  
13 speakers were in support of the special action request.  
14 Common issues raised in testimony included concerns  
15 about food security, the need to ensure upper river  
16 Yukon communities have harvest opportunities and the  
17 need to prohibit commercial fisheries in the Yukon  
18 River. Some speakers stated that past management  
19 actions have not provided a rural subsistence priority  
20 and several speakers requested tribal co-stewardship  
21 and trib -- and co-management agreements be  
22 implemented.

23  
24                   The OSM conclusion is to support FSA24-  
25 01 with modification to allow the Federal In-Season  
26 manager to lift a closure to the harvest of chinook,  
27 summer chum, fall chum or coho salmon based on in-  
28 season run indicators of harvestable surplus beyond  
29 Federal subsistence harvest.

30  
31                   So poor returns of Yukon River chinook,  
32 chum and coho salmon continued in 2023. The recent  
33 poor salmon runs have made it difficult to meet  
34 escapement goals and treaty obligations even with  
35 severe restrictions and closures on commercial, sport,  
36 personal use and subsistence harvest. Current  
37 forecasts suggest these trends will likely continue in  
38 2024. There's ample evidence that the recent lack of  
39 subsistence harvest opportunities has resulted in  
40 extreme hardships and continued loss of cultural  
41 practices particularly for upper river villages.  
42 Closure to the harvest of chinook, chum and coho salmon  
43 by non-Federally-qualified users and uses based on  
44 ANILCA Section .815 is necessary for the conservation  
45 of healthy populations of Yukon chinook, chum and coho  
46 salmon and to continue subsistence uses of these  
47 resources, however, if in-season indicators of run size  
48 project a harvestable surplus above that need for  
49 subsistence the Federal In-Season Manager may rescind  
50

0011

1 the Board's closure, which is the purpose of the OSM  
2 modification to the special action request.

3

4

5 That concludes our presentation. We'll  
6 standby to answer any questions from the Board and we  
7 also want to let the Board know that Holly Carroll, the  
8 Federal In-Season Manager, is also standing by to  
9 answer any questions you may have.

9

10 Thank you.

11

12 CHAIRMAN CHRISTIANSON: Thank you.

13

14 MS. PITKA: Hello, this is Public  
15 Member Rhonda Pitka.

16

17 CHAIRMAN CHRISTIANSON: You have the  
18 floor Rhonda.

19

20 MS. PITKA: Yeah, I had a question.  
21 How would in-season management look this summer? I  
22 heard that Holly Carroll was on the line and I just  
23 wanted her answer on that.

24

25 Thank you.

26

27 MS. CARROLL: Through the Chair.  
28 Member Pitka, this is Holly. I'm happy to answer what  
29 questions you have. Are you just looking for general  
30 in-season management, like an update on what we have  
31 planned or do you have specific questions?

32

33 MS. PITKA: Yeah, an update on what you  
34 have planned for this summer -- thanks.

35

36 MS. CARROLL: So I think based on the  
37 forecast that Cory detailed, you know, we're going to  
38 have very, very similar management to last year.  
39 Because of the need to protect chinook, we are going to  
40 need to have full salmon closures and so what that  
41 means is that all gillnets will need to be limited to 4  
42 inch or smaller mesh, we can't allow salmon gillnets in  
43 the water while the chinook are running. So that is  
44 unfortunate because with the increased summer chum we  
45 might have some opportunity to provide harvest for  
46 those but if we do it's going to be limited to  
47 selective gear types and that would be things like  
48 dipnets, manned fishwheels or beach seines. And so  
49 that allows pretty liberal hours of fishing for the  
50

0012

1 summer chum but it does mean that all chinook would be  
2 released alive.

3

4 So that would be the only fishing  
5 opportunity we might see in the summer season, would be  
6 those selective opportunities for summer chum.

7

8 And then going into fall season it'll  
9 look a lot like last year as well. Because the weakest  
10 component of the fall chum run is that Canadian origin  
11 run and that migrates its entire way from the mouth all  
12 the way up to Canada through the mainstem, we are  
13 likely to have gillnet closures, salmon gillnet  
14 closures all season so that we can protect those  
15 Canadian origin fall chum. However, if we can have  
16 some opportunity for Alaskan fall chum stocks, for  
17 instance if we're going to meet Alaskan or drainage-  
18 wide goals we may be able to open up some tributaries  
19 like the Koyukuk River, or like the Teejendrik River  
20 like we did last year. And those opportunities,  
21 depending on what species are present could be limited  
22 to selective gear fishing or we could consider some  
23 salmon gillnet opportunities. We'll know more about  
24 how that fall season would be managed once we see that  
25 in-season forecast that comes from the more in-season  
26 data from summer chum.

27

28 MS. PITKA: Thank you for that, I  
29 appreciate it.

30

31 CHAIRMAN CHRISTIANSON: Any further  
32 questions from the Board for Staff or the presenter.

33

34 (No comments)

35

36 CHAIRMAN CHRISTIANSON: Hearing none  
37 we'll move on to Orville.

38

39 MR. LIND: Can you hear me now?

40

41 CHAIRMAN CHRISTIANSON: Yes, you have  
42 the floor Orville for the tribal consultation summary.

43

44 MR. LIND: Thank you, Mr. Chair and  
45 Board members. Orville Lind, Native Liaison for the  
46 Office of Subsistence Management. And I'm going to try  
47 to focus on some key topics through the consultation,  
48 however, you've heard much of it on the analysis given  
49 earlier.

50

0013

1                   On, again, March 21st, 2024 a tribal  
2 consultation and ANCSA consultation was held during  
3 that date. The Yukon River Intertribal Fish Commission  
4 voiced, on the special action, asking the Federal  
5 Subsistence Board to uphold their conservation priority  
6 consumptive use provisions under Title VIII, also to  
7 uphold the Yukon River Salmon Agreement with Federal  
8 management of the Yukon River chinook, chum and coho  
9 salmon throughout the duration of the 2024 season.  
10 They also -- the Commission is looking to have the  
11 Federal In-Season Manager as managing the fishing  
12 schedules to include openings and closures and fishing  
13 methods. Opportunities for subsistence fishing has  
14 been severely restricted impacting subsistence salmon  
15 needs and, again, salmon runs have not really improved  
16 since 2022. Also the proponents very concerned with  
17 the actions that are reactive to the State of Alaska  
18 while not providing rural subsistence priorities and  
19 uses as necessary requirements for the declining  
20 population conservation in salmon.

21  
22                   Also there were several locals  
23 providing testimonies and concerns of the declining  
24 population and the testimonies offered full support of  
25 the special action request. And they also expressed  
26 concerns to regard, again, the State does not really  
27 take in subsistence and food security while  
28 consideration of management of that area.

29  
30                   There was also discussions about co-  
31 stewardship and co-management from many and they were  
32 asking how to set up effective co-management structures  
33 and asking if the Board already had one, does the  
34 Federal In-Season Manager have one, is there a way of  
35 setting all that up. It was clarified originally  
36 started by the Refuge, not OSM, there was a memo of  
37 understanding, an MOU, the question is also delegation  
38 of authority of letter from OSM who delegates to in-  
39 season managers would be helpful.

40  
41                   And also we conducted the ANCSA  
42 consultation on the same day later on that afternoon.  
43 And, again, many of the same things were mentioned as  
44 far as management of the chinook, chum and coho. There  
45 was some concerns about the moratorium, a seven year  
46 moratorium was related to this special action, however,  
47 the in-season manager shared that the seven year  
48 moratorium is different than the special action and the  
49 special action is more about taking Federal management  
50

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1 of the river, closing the river and limiting all  
2 fishing to Federally-qualified subsistence users on all  
3 four species is not really affected by a change in  
4 escapement goals for the Border, for chinook we already  
5 know we have a weak chinook run and it would require  
6 full closures so it doesn't affect some of the fishing.  
7 Looking at it all, it will not affect fishing chum  
8 either because the summer chums might be a little  
9 better this year, the chum run might be better, we have  
10 to limit the gear that people can use in order to  
11 protect the chinook and that the driving force behind  
12 some of the restrictions that might be in place on  
13 summer chum, that our drainage-wide is run -- our  
14 drainage-wide run is terrible of chinook and we have to  
15 see just what happens this summer.

16

17 And that concludes the consultation,  
18 Mr. Chair.

19

20 CHAIRMAN CHRISTIANSON: Thank you,  
21 Orville. Is there any questions from the Board for  
22 Orville.

23

24 (No comments)

25

26 CHAIRMAN CHRISTIANSON: All right,  
27 thank you for that presentation, Orville. We'll go  
28 ahead and move on to open the floor at this time for  
29 public testimony and, Operator, this would be the time  
30 we'd recognize them online. We will want to keep it  
31 specific to the agenda item and just be mindful of the  
32 time we are limited to today in our meeting space. So  
33 at this time if anybody would like to testify from the  
34 public, this is your opportunity.

35

36 MS. LAVINE: Thank you, Mr. Chair.  
37 This is Robbin LaVine, Subsistence Policy Coordinator.  
38 I want to give everybody some instructions on how to  
39 participate. If you press star, five, that will give  
40 you an opportunity to raise your hand and enter the  
41 speaker's que. For those of you have joined via Teams,  
42 you can automatically raise your hand through the  
43 instructions on your bar at the top of your screen.  
44 Otherwise, for people who have called in via  
45 teleconference you can press star, five to raise your  
46 hand and I will be calling on the last four digits of  
47 your number to recognize you. Right now we have a  
48 person with the last four digits of 0848 with their  
49 hand raised, you may proceed and address the Board.

50

0015

1 MS. ULVI: Good afternoon. This is  
2 Chief Karma Ulvi of the Han Gwich'in Tribe of Eagle and  
3 I'm the Chair of the Yukon River InterTribal Fish  
4 Commission. I was elected by the tribes in May in 2023  
5 at our annual meeting.

6  
7 Founded on tribal unity, the Yukon  
8 River InterTribal Fish Commission is made up of 40  
9 member tribal governments, authorized by tribal  
10 resolution whose mission is to protect the health and  
11 well-being of our people, our future generations and  
12 all Alaskans and Canadians who rely upon the health of  
13 our salmon. The purpose is to act as a unified voice  
14 for the conservation and restoration of all Yukon River  
15 fisheries, protect our traditional way of life and  
16 well-being, establish a comprehensive management plan  
17 and program based upon distinct customary and  
18 traditional indigenous knowledge and practices while  
19 striving for co-management to ensure meaningful and  
20 substantive tribal and First Nation participation in  
21 all aspects of fish stewardship.

22  
23 The Yukon River InterTribal Fish  
24 Commission voted at their meeting on November 2023  
25 requesting me as Chair to submit this Federal action  
26 request. I support the conclusion presented in the OSM  
27 analysis recommending that the Federal Subsistence  
28 Board adopt Federal Special Action 24-01 with the  
29 modifications proposed by OSM for a 50 CFR 100.27(e) (3)  
30 subsistence taking of fish, Yukon Northern area.  
31 Preemptive closure of Federal waters to non-Federally-  
32 qualified users and uses and assumption of Federal  
33 management is both warranted and required as necessary  
34 for the conservation of our declined salmon population.

35  
36 There are several reasons why this  
37 Federal action is warranted.

38  
39 Preemptive Federal management under the  
40 provisions of ANILCA is justified. The Federal  
41 Subsistence Board voted on May 4th, 2022 to unanimously  
42 support a very similar Yukon River Federal action  
43 request submitted by Charlie Wright of Rampart, Eagle  
44 and Holy Cross. Since that vote by the Federal  
45 Subsistence Board in May 2022 to assume fisheries  
46 management on Federal waters of the Yukon there has  
47 been no significant improvement in the stock status of  
48 these Yukon River salmon populations. There is no  
49 compelling information indicating that the 2024 chinook  
50

0016

1 and summer and fall chum salmon runs will be adequate  
2 to provide a harvestable surplus sufficient to meet  
3 customary and traditional harvest needs of Federally-  
4 qualified subsistence users in the watershed. It is  
5 only fair to let Federally-qualified users on the Yukon  
6 River know prior to the arrival of salmon who will be  
7 managing salmon and providing openers if there are  
8 enough fish for a harvestable surplus and whether a  
9 rural priority will be provided on Federal waters. The  
10 current Federal in-season manager is unwilling to take  
11 this action. ANILCA is the law and it applies equally  
12 to the Yukon as well as the Kuskokwim. Each year for  
13 the past 10 years the Federal Subsistence Board or the  
14 Federal in-season manager have preemptively announced  
15 closures of Federal waters of the Kuskokwim River to  
16 all but Federally-qualified users along with closure of  
17 the Yukon to the harvest of all salmon as needed for  
18 conservation. ANILCA applies equally to both the Yukon  
19 and the Kuskokwim, however, the current Yukon River in-  
20 season manager operates as if there is a different  
21 Federal subsistence law that applies to the Yukon and  
22 has been unwilling to preemptively announce closures.

23

24 We are appealing directly to the  
25 Federal Subsistence Board because there is a documented  
26 pattern and practice of past Federal in-season managers  
27 failing to uphold the provisions of ANILCA by allowing  
28 Alaska Department of Fish and Game managers to  
29 prioritize commercial fishing over meeting escapement  
30 and subsistence needs, which are supposed to be the  
31 highest priority.

32

33 As supporting evidence allow me to  
34 provide some examples directly from Alaska Department  
35 of Fish and Game's publicly available database.

36

37 In 2022, 2028 [sic] and 2010 State and  
38 Federal managers allowed a commercial chinook harvest  
39 on the Yukon but failed to meet the amounts reasonably  
40 necessary for subsistence our best available measure of  
41 long-term subsistence needs.

42

43 In 2008 and 2010 State and Federal  
44 managers allowed a commercial chinook harvest but  
45 failed to meet the Canadian Border passage goal.

46

47 In 2019 at a time when chinook salmon  
48 populations were failing all across Western Alaska  
49 rivers, the State and Federal managers allowed the

50



0017

1 commercial sale of chinook salmon incidentally  
2 harvested in the chum directed commercial fishery.  
3 Over 3,000 chinook salmon were sold in a year when the  
4 Canadian Border passage was barely achieved. We have  
5 had zero chinook subsistence harvest opportunities  
6 through years since.

7

8 In 2010 and 2019 State and Federal  
9 managers allowed a commercial chinook harvest but  
10 failed to meet the Chena River chinook escapement goal.

11

12 In 2003, 2004, 2009 and 2018 through  
13 2020 State and Federal managers allowed a commercial  
14 summer chum harvest but failed to meet the amounts  
15 reasonably necessary for subsistence.

16

17 The problem is that each of these  
18 Alaska Department of Fish and Game emergency orders for  
19 commercial fishing periods was formally reviewed by the  
20 State in-season manager at the time who determined that  
21 the opening did not violate ANILCA and was allowed to  
22 proceed. Any Federal management actions to open or  
23 close subsistence fishing in Federal waters of the  
24 Yukon River must uphold the provisions of ANILCA. We  
25 are very concerned with the precedents that in 2023  
26 when the actions of the Federally-designated in-season  
27 manager were solely reactive to management actions by  
28 the State of Alaska.

29

30 Furthermore, we ask OSM and the Federal  
31 Subsistence Board to require the Federal in-season  
32 manager to provide written justification for their  
33 management actions based on the provisions of ANILCA  
34 rather than simply mirroring the actions taken by the  
35 State of Alaska. The State of Alaska as matter of  
36 State Constitutional Law cannot provide a rural  
37 subsistence priority.

38

39 These are some of the reasons why we  
40 are appealing directly to the Board to take action to  
41 uphold provisions of ANILCA by adopting Federal Special  
42 Action 24-01 with the modification proposed by OSM.

43

44 We are aware that on several occasions  
45 the Commissioner of Alaska Department of Fish and Game  
46 has publically stated his intention to allow a  
47 commercial chum salmon fishery in the lower river if  
48 summer chum numbers improve. OSM analysis includes  
49 this alarming statement that if this special action

50

0018

1 request is not approved the State may allow commercial  
2 harvest of summer chum salmon if the projected run size  
3 of summer chum salmon is large enough to support such  
4 harvest. IT is alarming to the Fish Commission that  
5 there has been virtually no subsistence harvest of any  
6 salmon species for the past three years and that the  
7 State of Alaska may try to open a commercial fishery  
8 within Federal waters of the Yukon.

9  
10 In finishing, I would like to quote a  
11 well respected elder and family member of mine, former  
12 Chief Percy Henry from Tr'ondek Hwech'in First Nations  
13 Dawson Yukon Territory. He just recently passed away  
14 but he said; keep your lands clean, keep your animals,  
15 that's your friends, you look after them and they will  
16 look after you. You look after your water, land,  
17 trees, you look after. Respect it. That's your  
18 spirituality.

19  
20 Maasi'choo. Thank you all for  
21 listening to our concerns and considering our request.

22  
23 It's time that we look out for our  
24 people, our cultures, our way of life and our important  
25 resources. We need to make the important decisions  
26 that will help our salmon return and our cultures  
27 thrive.

28  
29 Thank you.

30  
31 CHAIRMAN CHRISTIANSON: Thank you. We  
32 appreciate you taking the time to call in and give us  
33 that history and understanding of what's going on in  
34 the river. Any questions from the Board.

35  
36 (No comments)

37  
38 CHAIRMAN CHRISTIANSON: Again, thank  
39 you for calling in today and testifying and I  
40 appreciate the wealth of information you presented us.  
41 Wish you luck in all those leadership roles as well.

42  
43 MS. ULVI: Thank you.

44  
45 CHAIRMAN CHRISTIANSON: Operator, is  
46 there anybody else at this time that would like to --  
47 I'm sorry, go ahead.

48  
49 MS. LAVINE: Thank you, Tony, this is  
50

0019

1 Robbin. Okay.

2

3 CHAIRMAN CHRISTIANSON: Yes, Robbin, go  
4 ahead.

5

6 MS. LAVINE: So for those of you who  
7 are waiting to provide public testimony or wish to get  
8 into the speaker's que, you can press star, five to  
9 raise your hand. So right now this is an opportunity  
10 to provide public testimony in our process and the next  
11 person -- right now we have a total of four remaining  
12 people in the speaker's que. The next person in line  
13 is the person with the phone number ending in 7467.  
14 You may press star, six to unmute your phone, and  
15 that's 7467, please press star, six. You may address  
16 the Board.

17

18 MR. WRIGHT: Can you hear me?

19

20 MS. LAVINE: Yes, we can, please  
21 introduce yourself and say your name and address the  
22 Board.

23

24 MR. WRIGHT: Okay, thank you to all.  
25 Chair Christianson and Board members. My name is  
26 Charlie Wright. I have a couple of presentations for  
27 you today, I'm going to be doing my first one for -- it  
28 would be for Tanana Chiefs Conference, Chief Chairman  
29 Brian Ridley, who is unable to participate in today's  
30 meeting. So I'll start by doing the Tanana Chiefs  
31 comments first. Thank you.

32

33 Chair Christianson and Board Members  
34 thank you for the opportunity to provide comments in  
35 support of this temporary special action request. I am  
36 providing comments on behalf of Chief Chairman Brian  
37 Ridley who is unable to participate in today's meeting  
38 in addition to serving as the Chairman of the Eastern  
39 Interior RAC and Subsistence Resource Commission,  
40 Tanana Rampart Manley local Fish and Game Advisory  
41 Committee and the Yukon Panel Traditional Knowledge  
42 Committee. I also was recently reelected to another  
43 three year term as the Secretary/Treasurer of the  
44 Tanana Chiefs Conference (indiscernible - muffled)  
45 primarily responsibilities is to represent TCC when  
46 Chief Ridley is unavailable.

47

48 The Alaska Tanana Chiefs Conference is  
49 (In Native) which translates to Our Land as good tribal  
50

1 stewards and to honor our culture and spiritual and  
 2 traditions, we speak for the land, waters and animals  
 3 who can no longer speak for themselves in spaces like  
 4 this Federal Subsistence Board. (Indiscernible) is an  
 5 Alaska Native non-profit corporation charged with  
 6 (indiscernible) self-determination and enhancing  
 7 regional unity among the tribal citizens of our member  
 8 tribes and associations. We serve and represent 32  
 9 Alaska Native communities including 37 Federally-  
 10 recognized tribes and more than 18,000 tribal citizens  
 11 throughout the Interior Alaska. Tribal stewardship of  
 12 our fish, animals, lands and waters for our future  
 13 generations as one of our highest priorities and  
 14 obligations of indigenous people. The (In Native)  
 15 (indiscernible) that social and service needs of tribal  
 16 citizens and beneficiar -- benefactori -- bene.....

17

18 UNIDENTIFIED VOICE: Beneficiaries.

19

20 MR. WRIGHT:.....beneficiaries  
 21 throughout our region. Our programs and services range  
 22 from direct (indiscernible) services to tribal  
 23 development services, tribal resources stewardship,  
 24 public safety, community planning and transportation.  
 25 Our people's lives depend on the salmon stocks of the  
 26 Yukon and Kuskokwim River drainages.

27

28 We stand in unity with the Yukon River  
 29 InterTribal Fish Commission in the call for ANILCA  
 30 Title VIII Federal subsistence protections of Yukon  
 31 River salmon fishery. Elders Katie John, Delores  
 32 Charles and Jean Henry from the upper Tanana regions  
 33 fought for the Federal subsistence fishing protections  
 34 for many years and it is finally come for these  
 35 protections to be realized throughout the Yukon River  
 36 drainage. Year after year the State prioritizes  
 37 commercial fishing over conservation and the State and  
 38 Federal subsistence priorities to the detriment of our  
 39 salmon and all future generations of users. Federal  
 40 managers have done little and this likely relates to  
 41 the fact that the Federal Subsistence Management  
 42 Program has never hired a Federal in-season manager who  
 43 has not previously managed commercial fisheries on the  
 44 Yukon River. While our understanding from  
 45 (indiscernible) AYK Tribal Consortium that there are 18  
 46 examples of this problem of management failure on the  
 47 Yukon River. We wanted to highlight one particular  
 48 example given all the recent talk by the State of  
 49 Alaska and the Federal in-season manager about

50

0021

1 foregoing further Federal temporary special actions on  
2 the Yukon River so that the State can constitute a  
3 commercial.....

4

5 (Teleconference interference -  
6 participants not muted - coughing)

7

8 MR. WRIGHT: .....fishery. Even  
9 selective gear and six inch mesh gillnets  
10 (indiscernible) based on a highly uncertain 2024 season  
11 outlook for summer chum salmon and dismal outlook for  
12 chinook and fall chum salmon, particularly for those  
13 salmon of Canadian origin.

14

15 So let's look back to the year 2019,  
16 the last time we really got to fish for salmon. The  
17 2019 outlook for Canadian origin chinook salmon was for  
18 69,000 to 99,000 fish with a drainage-wide outlook of  
19 168,000 to 241,000 chinook salmon. By June 26th, 2019  
20 the in-season assessment projects projected 95,000  
21 Canadian origin chinook would pass the Pilot Station  
22 sonar, however, by July 24th, 2019 it became clear that  
23 these fish were not reaching the Eagle sonar so the  
24 upper north District 5 fishing schedule once again was  
25 restricted by reducing weekly fishing times, and a  
26 complete closure representing a 10 day closure in all.  
27 Furthermore, subsistence fishing gear in District 5 was  
28 restricted to six inch mesh nets while the down river  
29 commercial chum fishery -- the total Canadian origin  
30 chinook salmon run was estimated to be 72,620 fish,  
31 which was significantly below the Pilot Station in-  
32 season assessment of 95,000 fish. Once, again, the  
33 Canadian Border passage goal of 42.5 (ph) chinook  
34 salmon was not met in 2019 despite managers allowing  
35 the retention and sale of incidentally caught chinook  
36 salmon during the commercial summer chum and commercial  
37 salmon fishery during the fall chum and coho commercial  
38 fisheries down river. In 2019 Alaska Board of  
39 Fisheries amounts necessary for subsistence lower bound  
40 of the end was exceeded by only 2,877 chinook  
41 salmon.....

42

43 (Teleconference interference -  
44 participants not muted)

45

46 MR. WRIGHT: .....estimated total of  
47 43,876 fish, the United States harvest of Canadian  
48 origin chinook salmon exceeded a treaty determined  
49 harvest (indiscernible) by 3,908 fish.....

50

0022

1 (Teleconference interference -  
2 participants not muted)

3  
4 MR. WRIGHT: .....the number of chinook  
5 salmon that passed into Canada was 1,208 fish than what  
6 was needed to meet the lower end of the (indiscernible)  
7 management escapement goal range of 42,500 fish.  
8 Between July 3rd and July 8th, 2019 commercial summer  
9 chum salmon fishing incidentally harvested 1,148  
10 chinook salmon which they were allowed to retain for  
11 personal use. The Yukon River salmon fishery has not  
12 only began to allow the commercial sale of incidentally  
13 caught chinook salmon beginning July 9th, 2019 with an  
14 estimated 2,582 chinook salmon caught and sold during  
15 the summer chum salmon fishery in District 1 and 2.  
16 During the fall season an additional 5,28 incidentally  
17 caught chinook salmon were incidentally harvested and  
18 sold in the commercial fall chum and coho fisheries.  
19 Therefore in 2019 the commercial chum salmon fishermen  
20 harvested -- what does this say -- excuse me, I'm  
21 sorry. Harvested 1,148 king salmon for personal use  
22 and 3,110 king salmon that were sold in -- a total of  
23 3,5 -- 3,258 chinook salmon incidentally caught during  
24 the direct chum salmon commercial opening. An  
25 additional 31 chinook salmon was harvested in the  
26 commercial chum salmon fishery on the Tanana River and  
27 retained for personal use. In 2019 the Chena River  
28 escapement goal was not met. Chinook salmon escapement  
29 was well below the 3, (indiscernible) average passage  
30 that the Gisasa and Henshaw weir sampling -- the Gisasa  
31 estimated sex composition of 24 percent female and 76  
32 percent male sampling that Henshaw Creek weir  
33 demonstrates sex ratios of 62 percent female and 38  
34 percent male (indiscernible) survey to assess chinook  
35 salmon escapement was well below the 2014 to 2018  
36 average on the west fork of the Andrafsky River and  
37 the (indiscernible - muffled) both forks of the Nulato  
38 River were met slightly above the 2000 to 2018 average.  
39 The Gisasa River goal also was (indiscernible) -- let  
40 us consider chum salmon in 2019 and summer chum salmon  
41 escapement in 2019 at the Anvik River was 200,000 and  
42 49,000 and 14, well below the below the escapement goal  
43 of 250,000 to 700,000 fish and well below the 2009 to  
44 2018 average of 412,659 fish. The goal at the  
45 Andrafsky River was met but escapement was below the  
46 2009 to 2018 average. Koyukuk River drainage summer  
47 chum salmon escapement was well below average on both  
48 the Gisasa and Henshaw Creek weirs which may have  
49 resulted from in-river mortality, from heat stress,  
50

0023

1 summer chum salmon escapement at the Chena River was  
2 2,704 fish which was also well below the 2009 to 2018  
3 average of 12,776 fish. Similarly estimated escapement  
4 on the Salcha River was 2,117 summer chum salmon which  
5 was also well below the 2009 to 2018 average of 34,646  
6 fish. In 2019 the total Federal Subsistence Board  
7 harvest of summer chum was 63,296 fish, which is 20,240  
8 chum salmon below the lower limit of the amount  
9 necessary for subsistence range of 83,500 to 142,192  
10 fish. ADF&G (indiscernible) subsistence harvest  
11 database, that's where that information came from.

12

13 So despite summer chum salmon tributary  
14 escapement goals going unmet are well below the  
15 historic averages and despite subsistence harvest has  
16 fallen below the lower limit of the State amount  
17 necessary for subsistence finding, commercial fishermen  
18 were allowed to harvest a total of 227,089 summer chum  
19 salmon in 2019 in the TCC region commercial fishermen  
20 in District 6 harvested 1,596 summer chum which earned  
21 them a total of exvessel value of \$2,800. The  
22 remaining 225,493 fish were harvested and sold in lower  
23 river districts 8,265 in financial gain.

24

25 Finally, Western academic science has  
26 begun to catch up with our indigenous knowledge,  
27 outstanding research being conducted by ADF&G, Dr.  
28 Katie Howard and Sabrina Garcia is finally  
29 demonstrating that the problem with Yukon River chinook  
30 salmon is here in the freshwater system and during the  
31 smoltz first three months of life after they leave the  
32 mouth of the Yukon River, the problem is here, the  
33 problem is with the State and Federal salmon fishery  
34 managers not allowing proper numbers of salmon to reach  
35 the spawning grounds to lay their eggs because of their  
36 love affair with money and commercial exploitation.  
37 Today's escapement goals are based only on the numbers  
38 of fish, not the quality of escapement, those  
39 escapement goals must be higher to compensate for  
40 declines in salmon size especially when one of the  
41 disastrous and we must rebuild our stocks. Why are  
42 the females produce expeditiously greater numbers of  
43 eggs into gravel, why are the female salmon lay larger  
44 eggs because of a greater chance of survival.

45

46 While TCC acknowledges that, you know,  
47 in hindsight of 20/20, it is imperative that the State  
48 and Federal managers learn from their past choices and  
49 begin listening to us, (indiscernible) if necessary

50

0024

1 (indiscernible) conservation salmon fisheries  
2 management is crucial in our salmon -- if our salmon  
3 are to recover. If (indiscernible) species management  
4 continues (indiscernible) on more than 11,000 year  
5 legacy of successful tribal stewardship of salmon  
6 remains at risk and our salmon are destined for  
7 extinction.

8

9 Our tribes and those of the Yukon River  
10 InterTribal Fish Commission must have a formal seat in  
11 all salmon management decisionmaking tables both in-  
12 river and in the marine environment to honor our  
13 gravel-to-gravel tribal stewardship responsibilities  
14 throughout the salmon's life cycle. (In Native) will  
15 not rest until this is achieved.

16

17 For many years our people in the TCC  
18 region have been unjustly vilified for illegal salmon  
19 fishing, illegal customary trade of chinook strips, et  
20 cetera. We look (indiscernible) efforts by both  
21 Federal and State managers to explain why their  
22 forecast based on Pilot Station sonar are not arriving  
23 at the Eagle sonar, despite more than 20 years of our  
24 tribal leaders and stewards telling the State and  
25 Federal managers that something was wrong in the Yukon  
26 River chinook salmon, it is only now that Western  
27 Science is (indiscernible) trained commercial fisheries  
28 managers will be (indiscernible) recognize that both  
29 chinook and chum salmon are dying in river before  
30 reaching their spawning grounds. For years our leaders  
31 have been raising concerns about the loss of older age  
32 classes, the decrease in size and health of salmon and  
33 the impacts of spawning grounds and conservation for  
34 sustainable fisheries for future generations.

35

36 TCC supports the Special Action Request  
37 to uphold the provisions of ANILCA, Title VIII. TCC  
38 (indiscernible).....

39

40 (Teleconference interference -  
41 participants not muted)

42

43 MR. WRIGHT: .....opposes commercial  
44 salmon fisheries on the Yukon River in 2024 and we  
45 demand more precautionary management by (indiscernible)  
46 Kuskokwim River through the Federal tribal fisheries  
47 management partnership. TCC is a signatory for the  
48 Kuskokwim River InterTribal Fish Commission, U.S. Fish  
49 and Wildlife Service Fisheries Co-Management Agreement  
50



0025

1 and we proudly acknowledge that (In Native) which has  
2 resulted in chinook salmon escapement goals being met  
3 in the upper end of the State's escapement goal range  
4 each year during the past decade also continue, to  
5 provide for continuation of Federal customary and  
6 traditional uses that Title VIII requires. TCC  
7 contends that such a Federal tribal (indiscernible)  
8 partnership is the only hope for Yukon River salmon and  
9 our future generations of tribal citizens and our  
10 Native indigenous (indiscernible) friends and  
11 neighbors.

12  
13 Thank you for your time to provide  
14 comments.

15  
16 Ana'ba see.

17  
18 UNIDENTIFIED VOICE: (Indiscernible)

19  
20 MR. WRIGHT: Thank you, Mr. Chair.

21  
22 CHAIRMAN CHRISTIANSON: Thank you,  
23 Charlie.

24  
25 MR. WRIGHT: So I have another.....

26  
27 CHAIRMAN CHRISTIANSON: We appreciate  
28 you taking that -- is there any questions for Mr.  
29 Wright here -- oh, you have another comment there,  
30 Charlie.

31  
32 MR. WRIGHT: Well, while I have the  
33 floor I have.....

34  
35 (Teleconference interference -  
36 participants not muted)

37  
38 CHAIRMAN CHRISTIANSON: You have the  
39 floor.

40  
41 MR. WRIGHT: While I'm here -- while I  
42 have the floor I have the Eastern Interior Regional  
43 Council's comments on the -- so if I may, after  
44 questions.

45  
46  
47 MS. LAVINE: Mr. Chair, this is Robbin.

48  
49 CHAIRMAN CHRISTIANSON: Yes, Robbin, go  
50

0026

1 ahead.

2

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MS. LAVINE: Thank you, Mr. Chair. Charlie, if you'll hang on and respond to any Board questions, I just want to let everyone know first that until you have the opportunity to address the Board please keep your phones muted. You can do so by pressing star, six or the mute button on your phone. Additionally, Charlie, there will be an opportunity later to present your Eastern Interior Regional Advisory Council recommendations. So if you'll hold on to those, you'll have an opportunity to provide them to the Board a little further on down the agenda.

MR. WRIGHT: That's fine. That's fine, thank you.

MS. LAVINE: Back to you, Mr. Chair.

CHAIRMAN CHRISTIANSON: Yes, is there anybody else who would like to testify, Robbin you stated there should be three more.

MS. LAVINE: Yep. We have about four more people in the speaker's que. The next person in the que has the last four digits of 2082. So if you're phone number ends in 2082 please press star, six to unmute yourself. There you go, you may address the Board.

MR. ONEY: Good afternoon, can you hear me?

CHAIRMAN CHRISTIANSON: Yep, we can hear you loud and clear, you have the floor.

MR. ONEY: Yes, good afternoon. Thank you, Mr. Chairman and members of the Board. My name is Raymond Oney, I'm the Chairman for the YKRAC. The YKRAC met on March 8 and gave recommendations for Fisheries Special Action Request FSA24-01.

The Yukon Kuskokwim Delta Council supported FSA24-01 with modification. The modification was to 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

0027

1 residents of Scammon Bay, Hooper Bay and Chevak do not  
2 intercept Yukon River bound salmon and should not be  
3 subject to the same fishing restrictions as those along  
4 the Yukon. The Council, otherwise, supports a closure  
5 to non-Federally-qualified users due to conservation  
6 concerns for the Yukon River salmon.

7

8 That concludes my comment, thank you.

9

10 CHAIRMAN CHRISTIANSON: Thank you.  
11 Thank you for taking the time to call in. Does anybody  
12 have questions from the Board.

13

14 (No comments)

15

16 CHAIRMAN CHRISTIANSON: All right,  
17 Robbin, you have the floor.

18

19 MS. PITKA: Hi, this is Rhonda Pitka. I  
20 just want to make sure that that comment is reflected  
21 at the proper time during Regional Advisory Council  
22 recommendation. Thank you.

23

24 CHAIRMAN CHRISTIANSON: Thank you,  
25 Rhonda.

26

27 MS. LAVINE: Mr. Chair, we have three  
28 more people.

29

30 CHAIRMAN CHRISTIANSON: You have the  
31 floor, Robbin.

32

33 MS. LAVINE: Thank you, Mr. Chair. We  
34 have three more people in the speaker's que. The next  
35 person with their hand raised has the last four digits  
36 of 1015. So if your phone number ends in 1015, please,  
37 yep, you're unmuted, please address the Board.

38

39 MS. STEVENS: Good afternoon, are you  
40 able to hear me?

41

42 CHAIRMAN CHRISTIANSON: Yes, you have  
43 the floor.

44

45 MS. LAVINE: Yes, we.....

46

47 MS. STEVENS: Good afternoon. Are you  
48 able -- oh, thank you, through the Chair and the  
49 Federal Subsistence Board. My name is Carrie Stevens.

50

0028

1 And I am calling in today from (In Native) Arctic  
2 Village. I share that because I am in support of the  
3 Special Action 24-01.

4  
5 Subsistence needs have not been met on  
6 the Yukon the vast majority of the last two decades for  
7 chinook, several times, also for fall chum. We need a  
8 unified management of all salmon species because they  
9 run together in the river as we've heard. I support  
10 the comments of the Yukon River InterTribal Fish  
11 Commission and the Tanana Chiefs Conference.

12  
13 As a traditional participating in a  
14 traditional fish camp (In Native) this is of dire  
15 consequence to all the people of the Yukon and the  
16 salmon. So there must be Federal management of all  
17 species for the priority of Federally-qualified users  
18 along the Yukon. And so for this reason I just wanted  
19 to get on record and state that subsistence needs are  
20 not being met. There is a huge conservation concern.  
21 And along with the general subsistence needs of  
22 fishing, the trading and bartering network also covered  
23 within ANILCA Title VIII and the cultural, social and  
24 spiritual practices are also not being met. I'm in a  
25 place where -- of course it is not along the Yukon but  
26 there is a great trading network between here and  
27 salmon communities and you see here larger pressure  
28 and trade on their resources, such as caribou due to  
29 the lack of salmon. So I just want to reiterate, we're  
30 not capturing the full implication of the lack of  
31 subsistence needs being met and the conservation  
32 concerns that we hear over and over again complete lack  
33 of -- collapse, excuse me, of ecosystem due to the lack  
34 of these keystone species across Federal public land,  
35 (indiscernible) lies within the Yukon Flats National  
36 Wildlife Refuge and we are seeing very dire ecosystem  
37 collapse all the way down to the birds, the insects,  
38 and of course the large animals. They're hungry.  
39 There's a huge nutrient missing from the ecosystem and  
40 so we must have a coordinated Federal management of the  
41 fall, summer chum and the chinook as you've heard.

42  
43 While I understand people's desire to  
44 fish down river, when there is summer chum, we know  
45 there is absolutely an incidental take of chinook and  
46 fall chum at this point and that, you know, I'm very  
47 skeptical of this, (indiscernible) least, I think all  
48 fishermen are, as elders have always told us, if you  
49 touch a fish you have to take it. It's not going to  
50

0029

1 survive. And for this reason elders have been very  
2 critical of multiple, different gear types, and so no  
3 six inch nets is absolutely necessary along the whole  
4 river for all of the salmon run and we just cannot  
5 support any commercial fishery in the Yukon. I think  
6 what we see is really the State's failure, their  
7 response with Canada is to close down the river and not  
8 addressing other issues or prioritizing those who rely  
9 on the resource.

10

11 So I just wanted to call in in support  
12 of Special Action 24-01 and I think some of the  
13 concerns regarding tribal citizenship who, the  
14 urban/rural divide created by ANILCA, Title VIII, you  
15 know, our families will continue to fish together, they  
16 just can't set nets and check nets. But right now we  
17 must have a Federal system where a Federal manager will  
18 really implement ANILCA, Title VIII, it's the only  
19 opportunity to provide for subsistence into the future  
20 and to provide for these salmon to survive.

21

22 Thank you.

23

24 CHAIRMAN CHRISTIANSON: Thank you.  
25 Appreciate you taking the time to call in today. Any  
26 questions from the Board, comments.

27

28 (No comments)

29

30 CHAIRMAN CHRISTIANSON: Appreciate the  
31 call. Robbin, you have the floor.

32

33 MS. LAVINE: Thank you, Mr. Chair. The  
34 next person in the speaker's que has a phone number  
35 ending in 6546. So if your phone number ends in 6546  
36 you can press star, six to unmute your phone. There  
37 you go, you may address the Board.

38

39 MR. SAMUELSON: How is my audio?

40

41 MS. LAVINE: Great.

42

43 MR. SAMUELSON: Thank you. Good  
44 afternoon Chair Christianson and members of the Board.  
45 I want to thank you for this opportunity to provide  
46 testimony today and in support of Federal Action 24-01.  
47 My name is Jonathan Samuelson. I am the current Chair  
48 of the Kuskokwim River InterTribal Fish Commission,  
49 which as you well know is the body that represents 33  
50

0030

1 sovereign nations of the Kuskokwim River watershed in  
2 regard to our salmon relatives in fisheries management  
3 up and down the river,  
4

5                   The Kuskokwim Fish Commission met  
6 recently at our annual meeting under this theme, (In  
7 Native), which when we translate those thoughts come  
8 out as something like this.

9  
10                   Weaving our nets, making connections  
11 and unifying our voices in the Kuskokwim and beyond.  
12

13                   And, you know, the Fish and Wildlife  
14 Service has been a vital part of that net that we speak  
15 of because we have been tribal co-managers for the past  
16 eight years on the Kuskokwim managing over 80 percent  
17 of salmon harvest on the river within Federal waters of  
18 the Yukon Delta National Wildlife Refuge.  
19

20                   But we're not here to talk about the  
21 Kuskokwim today, you know, we're here to talk about the  
22 Yukon, and we stand in unity and fully support the Yukon  
23 River InterTribal Fish Commission's request and calling  
24 for ANILCA, Title VIII Federal subsistence protections  
25 of the Yukon River salmon fisheries.  
26

27                   My comments will be brief as you've  
28 heard, really, from several of the tribal  
29 representation on the Yukon already which are the real  
30 experts on today's subject. I would offer that, you  
31 know, the Kuskokwim River InterTribal Fish Commission  
32 and their co-management stewardship has really provided  
33 the framework and foundation for what co-management  
34 looks like and what it can do and I would reiterate our  
35 hard work and success with escapement numbers being met  
36 and the work that we've seen take place as far as  
37 rebuilding of our stocks and our salmon runs. You  
38 know, I think the Yukon, even more so, is beyond the  
39 point of conservation, that time has come and gone and  
40 they really need to look at what it's going to take to  
41 rebuild and then conserve from there.  
42

43                   So I think it's time for the Federal  
44 government to step up and I'll just take this  
45 opportunity to remind you that the Federal government  
46 has a trust responsibility to all tribes no matter  
47 where they fall on the map, no matter what color their  
48 communities may be, on a map or how those might be  
49 sliced and diced, the trust responsibility is there  
50

0031

1 regardless.

2

3

4 And I think it's time, also, to really  
5 remember Katie John, and the fight and the precedence  
6 has been set and how that was recently held up in the  
7 Department of Interior versus the State of Alaska case,  
8 which is making its way through different circuits as  
9 we speak, but, you know, how ANILCA was intended to  
10 help and put those protections into place. I think the  
11 people of the Yukon River really need the Federal  
12 government's help right now and needs to implement that  
13 the Federally-qualified users are the priority users of  
14 subsistence fish and they need that extra protection as  
15 do the salmon that need that protection from the  
16 potential commercial fisheries that would add to the  
17 current devastation and not limiting of who can  
18 harvest, which the State of Alaska has no mechanism for  
19 at this time, although they do have a subsistence  
20 priority in the Constitution.

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So I'm really here just to remind you  
all of those things and the success that we've seen  
through co-management on the Kuskokwim River. I'm not  
an expert in all the numbers, others will have that  
data. I'm not an expert on the Yukon River although I  
have family and friends and deep ties to that  
watershed. You have heard from them and you will hear  
from more of them and really, you know, Federalizing  
management on Federal waters of the Yukon River is the  
best way to get decisionmaking back to the ground level  
and to ensure that tribes are being properly consulted  
and local input is heard and the decisionmaking is not  
coming down, being forced by other governments and  
ignoring the sovereignty of, I don't know, 50-plus  
tribes on the Yukon. So I implore you to enact that.

And just in conclusion, again, the  
Kuskokwim InterTribal Fish Commission supports Federal  
action 24-01 and urges this Board to uphold ANILCA by  
approving the Federal subsistence action.

Quyana.

CHAIRMAN CHRISTIANSON: Thank you.  
Appreciate you calling in today, any questions or  
comments from Board.

(No comments)

0032

1                   CHAIRMAN CHRISTIANSON: Robbin, you  
2 have the floor.

3  
4                   MS. LAVINE: Thank you, Mr. Chair. The  
5 next person in the speaker's que has the last four  
6 digits of 1843. That's 1843. If your phone number  
7 ends in 1843 you may unmute yourself and address the  
8 Board. Thank you.

9  
10                   MS. THOMPSON: Quyana. My name is (In  
11 Native) Thompson. I am.....

12  
13                   MS. LAVINE: Oh, I'm sorry for some  
14 reason -- hello, for some reason you cut out, we.....

15  
16                   MS. THOMPSON: Yes.

17  
18                   MS. LAVINE: .....lost you, could you  
19 please start again. Right as you were introducing  
20 yourself we lost you.

21  
22                   MS. THOMPSON: It just cut me off, I  
23 have no idea. Anyway, Quyana, my name is (In Native)  
24 Thompson. I am a traditional council member from the  
25 Native Village of Paimiut as well as the grants and  
26 tribal development person for my village and another  
27 village I actually work with. I'm also a Commissioner  
28 for the Yukon River InterTribal Fish Commission.

29  
30                   And I'm calling in today to support, to  
31 express my support for the Special Action Request  
32 FSA24-01 that was put forward to your Board by the body  
33 that I am a part of, the Yukon River InterTribal Fish  
34 Commission. You've heard all the numbers from  
35 President Ulvi and from Charlie Wright and a number of  
36 other people. And this is something that I have spent  
37 a great deal of time recently, most recently testifying  
38 on because of how important salmon, the relationship  
39 with salmon is to our peoples.

40  
41                   And as Mr. Samuelson mentioned before,  
42 there are tons of people that have submitted numbers,  
43 escapement numbers as well as any numbers that the  
44 population have been counted, that type of thing, but  
45 one of the things that I also wanted to remind this  
46 body is, is this longstanding relationship that we've  
47 had with our salmon. Here in Alaska that ranges from a  
48 recorded 11,500 to (indiscernible - cuts out) so about  
49 10 to 15,000 years of our recorded relationship with  
50



0033

1 salmon specifically, it could be longer. And only in  
2 the time that the State of Alaska and the other bodies  
3 that look at -- quote/unquote managing our resource has  
4 the decline in salmon population become so grave that  
5 we are facing extinction level events for our chinook  
6 salmon as well as some of our other salmon. For those  
7 of us that are counted among the people utilize the  
8 salmon up and down the Yukon from the headwaters in BC  
9 all the way down to the mouth, and where I live, I  
10 actually don't live on the mouth, my people come from  
11 Paimiut and Hooper Bay, Scammon Bay, we typically fish  
12 out in the waters or in other rivers and lakes, rivers  
13 like Black River and such. However, these  
14 relationships that we have with our relatives up the  
15 Yukon is longstanding as our relationship with salmon.  
16 And because of that it is imperative that this body  
17 remembers it's not just Federal stats that you have to  
18 look at, you need to start looking at the relationship  
19 that we have and we've held and we've cherished for  
20 tens of thousands of years.

21  
22 The closure of the Federal public  
23 waters of the Yukon River drainage to the harvest of  
24 chinook, summer and fall chum and coho except by our  
25 traditional use people are subsistence users in 2024 is  
26 incredibly important for a number of reasons. The  
27 reasons for health, as well as health and well-being.  
28 The thing that people don't consider is the emotional  
29 and psychological health access to our fish gives us.  
30 It gives us peace of mind because this is something  
31 that we've had. For myself, I'm almost a 50 year old  
32 woman and for the majority of my life, especially when  
33 I lived in the village I had salmon every single day.  
34 I've made a number of different trips to D.C., and I'm  
35 going to be still again next month and I will, again,  
36 implore and testify to the people that we're meeting  
37 with, including Lisa Murkowski, to uphold the  
38 agreements within ANILCA as well as the Magnuson-  
39 Stevens Act and the promises that the U.S. government  
40 has held with indigenous peoples in our region to  
41 protect our subsistence use.

42  
43 As far as the co-management and co-  
44 stewardship agreements that the State of Alaska and the  
45 Federal government have started to employ, they will  
46 rely heavily on the traditional ancestral knowledge of  
47 indigenous peoples to be able to make those agreements  
48 successful. And that's another sector in which I work  
49 diligently as my village working on cultural rangers,  
50

1 especially related to climate change. There are a  
2 number of different factors that are at play within our  
3 fisheries. Overfishing by trawlers, obviously, is a  
4 huge one. But also the changing climate, and that's  
5 something I spend a great deal of time on, not only  
6 studying but speaking out for. The closure of our  
7 waters to everybody but subsistence users will give us  
8 a little bit of time and also rebuild, not only our  
9 spirits but also the ability for us to continue to  
10 cultivate the relationship with salmon we've had since  
11 time immemorial. For us to require fishing schedules  
12 and use of unusual fishing measures for us is  
13 difficult. I understand the need for the smaller mesh  
14 size so that we avoid chinook salmon and such, but  
15 making sure that Yup'ik people and Dena relatives of  
16 the river fish with dipnets is a little ridiculous  
17 given the fact that that's not our preferred method for  
18 fishing for decades and decades.

19  
20 The determination of these closures and  
21 what we can do as indigenous people by a Federal  
22 fisheries manager is a little ridiculous also in the  
23 sense that we've held a longstanding relationship with  
24 our salmon relatives and for up until you guys got  
25 involved, the Federal managers got involved, we managed  
26 that relationship just fine. We understood when we  
27 could fish, we understood once we got our quotas or not  
28 even our quotas, but what would feed our family for the  
29 rest of the year, once that was done we put our gear  
30 away, we pulled out the weirs or the nets and we  
31 allowed our salmon to go. It even goes so far as to  
32 the -- for those of my relatives that live on the Yukon  
33 River to know which salmon are down for the Yukon by  
34 where they swim in the river. So all these things,  
35 from a cultural lens, need to be addressed. We have  
36 had this relationship far longer than any of the  
37 regulations that you have put into place, been around.

38  
39 So I implore you not only to pass this  
40 special action request but also to reach out to those  
41 of us that are doing work in reemploying traditional  
42 knowledge in relation to land management, fisheries  
43 management, wildlife management with people, not just  
44 from the State but also from around the world. One of  
45 the things that I do, personally, is to work with  
46 indigenous peoples from around the world in relation to  
47 birds, fish, land, et cetera and for the State and for  
48 the Federal regulatory bodies, getting in touch with  
49 and beginning to work with people like myself is going  
50

0035

1 to be imperative in the success of maintaining and  
2 managing these stocks for the future, and especially in  
3 the changing landscape.

4

5 I appreciate the time that you've taken  
6 to listen to me. I appreciate the time that the Board  
7 and all the Chairs for the bodies that have represented  
8 themselves on this call have taken. I know how  
9 important this work is for all of us. And without the  
10 advocacy of everyone that has spoken we would not be  
11 here at this juncture. So, again, I implore you to  
12 pass this special action request and to be open to  
13 accepting, not only recommendations from us who live  
14 with the land and who live with our non-human relatives  
15 but also to be open to innovative ideas going forward.

16

17 Qu yana.

18

19 Thank you.

20

21 CHAIRMAN CHRISTIANSON: Thank you for  
22 taking the time to call in, any questions from the  
23 Board or comments.

24

25 (No comments)

26

27 CHAIRMAN CHRISTIANSON: Appreciate you  
28 taking the time to call in and testify. Robbin, you  
29 have the floor.

30

31 MS. LAVINE: Thank you, Mr. Chair. All  
32 right, for the next person in the speaker's que has the  
33 phone number that ends in 1182. 1182 you may address  
34 the Board.

35

36 MR. KIRK: Hello, Mr. Chair, can you  
37 hear me?

38

39 CHAIRMAN CHRISTIANSON: Yes, I can hear  
40 you, you have the floor.

41

42 MR. KIRK: Hi. My name is Ronald Kirk.  
43 I serve on the RAC for Western Seward Peninsula Federal  
44 Board RAC. I'm concerned -- I'm supporting FSA24-01.

45

46 My concern is our people in the  
47 Kuskokwim area who have been suffering subsistence-  
48 wise. Our ancestors live off this land and the ocean  
49 and the Federal waters for tens and thousands of years

50

0036

1 and managed the fisheries on their own. We gather  
2 subsistence use, fish enough to feed our families and  
3 our relatives and then we pull our nets. That's how  
4 our ancestors managed the fish in the past. I'm  
5 wondering -- my concern is trawlers. We have trawlers  
6 out in the Bering Sea that go trawling and they get a  
7 lot of bycatch and I'm pretty sure some of that bycatch  
8 is the fish that goes up the Kuskokwim River into the  
9 Canadian waters. So I'm wondering, the Federal  
10 government needs to put a lien on bycatch -- on the  
11 trawlers out there because they're not only destroying  
12 our fish, they're destroying marine mammals. But my  
13 concern is fish going up into the Kuskokwim in the  
14 river all the way to Canada.

15  
16 Another concern I have concerning the  
17 Yukon River and the Canadian rivers is mining. When  
18 the mining starts in the Yukon River I'm pretty sure --  
19 they say they're covering everything but they have -- I  
20 know for a fact they probably use mercury and all that  
21 stuff gets washed out into the rivers and it damages  
22 our rivers and that's also damaging the salmon that go  
23 up to the Canadian waters. I'm very concerned about  
24 that because if this -- if the Kuskokwim area is  
25 suffering now, what are we going to do in the Coastal  
26 area. We will suffer too because it's not only the  
27 Kuskokwim salmon that's being destroyed it's the  
28 Coastal salmon that's being destroyed too because they  
29 also go up the rivers to spawn. And if they don't have  
30 no rivers to go up into to spawn we're all going to  
31 suffer and our children's children's are going to be  
32 suffering the worst. So we have to think about our  
33 future generations and see if we can co-manage our  
34 salmon and make sure that everybody gets an equal share  
35 of salmon. And also like I stated earlier, we know  
36 when to stop fishing, we pull our nets out and we let  
37 the salmon go. My concern is our people and the whole  
38 state of Alaska are subsistence users and we're all  
39 suffering right now.

40  
41 Thank you, Mr. Chair,

42  
43 CHAIRMAN CHRISTIANSON: Thank you.  
44 Appreciate you taking the time to call in today. Any  
45 questions or comments from the Board.

46  
47 (No comments)

48  
49 CHAIRMAN CHRISTIANSON: All right,

50

0037

1 appreciate that. Robbin, you have the floor.

2

3 MS. LAVINE: Thank you, Mr. Chair.

4 There's no one else in the speaker's que. If you do  
5 want to address the Board this would be your last  
6 chance, star, five to raise your hand. And I see that  
7 we have the person with the last four digits 7467. You  
8 may press star, six to unmute yourself and address the  
9 Board.

10

11 MS. BURK: Hello, this is Eva Burk.

12 I'm the consultant for the Yukon River InterTribal Fish  
13 Commission and I also have Charlie Wright here and he  
14 needs to give the EIRAC testimony as well. Is that  
15 okay?

16

17 MS. LAVINE: Okay, thank you, Eva.

18 This is Robbin. That will be coming up shortly,  
19 actually probably next, so once we're done with  
20 public.....

21

22 MS. BURK: Okay. Because I had.....

23

24 MS. LAVINE: .....testimony.

25

26 MS. BURK: Okay. I just heard the  
27 other guy went so I wasn't sure. I'd like to thank the  
28 people who have testified before me and, of course, the  
29 support from Tanana Chiefs and others have testified to  
30 and want to thank Jonathan Samuelson with the Kuskokwim  
31 River InterTribal Fish Commission. I think he had some  
32 really valid points about how we can use what the  
33 Kuskokwim is doing as model in our efforts to work on  
34 co-management and co-stewardship for the Yukon River.  
35 And I think it's very essential that a big part of what  
36 we do is also thinking about a rebuilding plan.

37

38 And before I get into a couple points  
39 I just wanted to note something that I think Karma and  
40 Charlie were both testifying to, is that, you know, we  
41 put in this special action request because from what we  
42 know the Federal in-season manager has had the  
43 opportunity to review every Department of Fish and Game  
44 opening for the past 20 years and so that -- and  
45 they're supposed to review every opening and closure to  
46 ensure it does not violate ANILCA and as you heard in  
47 Charlie's testimony, specifically, the numerous times  
48 where commercial fishing has been prioritized over  
49 subsistence and that, you know, that's the importance  
50 of us putting in a special action request and the

50

0038

1 Federal Subsistence Board being able to uphold the  
2 ANILCA and that, you know, the -- that the failure to  
3 meet subsistence needs and escapement goals is not just  
4 the State of Alaska but it's also the Federal  
5 government too, and so we really need to be working  
6 together to make sure that we're working on a plan for  
7 Yukon River salmon. And as part of that rebuilding  
8 plan I do agree with something that the gentleman prior  
9 to me just said about what's happening in the marine  
10 environment. I know this special action request is  
11 specifically for Federalizing the parts of the river  
12 that are on shore but we really need to be working  
13 together on a plan that's addressing what's happening  
14 off shore in the marine environment to our salmon so  
15 there's some science that's happening in the near shore  
16 environment that we need to be part of and then also to  
17 protect salmon on their migration path home that those  
18 intercept fisheries and Area M as well as the bycatch  
19 in the pollock industry. Right now the Fish and Game  
20 Commissioner is talking about conservation closures for  
21 salmon, Western Alaska salmon, so I think that's  
22 something that this body needs to be aware of in  
23 thinking about how we're going to use those, our salmon  
24 stocks on the Yukon River. And I think it's really  
25 important to note the seven year agreement that the  
26 State is working on because the logic in the seven year  
27 agreement to increase the Canadian Border passage of  
28 chinook salmon from 42,500 up to 71,000 is based on the  
29 fact that, you know, the females are getting smaller so  
30 the new productivity success of the females that are  
31 passing is not where it historically used to be so  
32 they've increased the passage, which is about 60  
33 percent escapement goal increase and that -- I feel  
34 that logic needs to be applied to all of the escapement  
35 goals in the Yukon River and for all species. So that  
36 would mean our tributary escapement goals for chinook,  
37 summer and fall chum.

38  
39 So I think that's something important  
40 to work on and not lose sight of in this agreement, is  
41 that, these are some of the actions that we.....

42  
43 MR. WRIGHT: (Talking in the  
44 background)

45  
46 MS. BURK: Charlie.

47  
48 These are some of the actions we need  
49 to support with the Federal Subsistence Board and the  
50

0039

1 in-season manager because this -- if we're working to  
2 increase our escapement goals, that this would ensure  
3 we are managing to the upper range of escapement goals.  
4 Had the Federal in-season manager in one of our  
5 meetings at the Tanana Chiefs Conference Convention in  
6 March of this year said that, you know, it would be  
7 wise to manage to those upper range and so I think  
8 increasing escapement goals would get us there and we  
9 need to give all species a chance to rebound.

10

11 I think even what I've learned in off  
12 shore, for like the chinook bycatch is that a lot of  
13 priorities and (indiscernible - muffled) was getting to  
14 managing the chinook bycatch but that chum bycatch kind  
15 of fell to the wayside and then that's why we've seen  
16 great high numbers of bycatch, chum salmon bycatch in  
17 2021 so it's very important to be looking at, I think,  
18 chinook and chum together and to not, you know, just  
19 prioritize one or the other. And I so just say this is  
20 because the second year of focusing on chinook but from  
21 what I can see in that seven year agreement, the  
22 Federal in-season manager is still surprised of all of  
23 these different things and still has lines of  
24 communication and so I think when it does come to the  
25 Yukon River salmon that we all need to be working  
26 together, the Yukon River InterTribal Fish Commission,  
27 YRDFA, the tribes, you know, the State of Alaska and  
28 the Federal in-season manager. I really do believe  
29 that we all need to be working together, and the Yukon  
30 River Panel, I don't want to forget our First Nation  
31 villages either.

32

33 So that's just about all I have for  
34 comments today except for one last final comment that  
35 there can actually be no commercial fishing for chum  
36 salmon in the near time future. We were at the Yukon  
37 River Panel and we saw something come up, I think from  
38 State of Alaska managers, for the lower Yukon district  
39 for potentially looking at a commercial chum salmon  
40 opener and I think when we look back at how that's been  
41 done in the past there's always been an incidental take  
42 of chinook when you use 6 inch net to target summer  
43 chum and you especially see that as you move up the  
44 river because our female kings can run with the summer  
45 chums. So the Fish Commission and TCC strongly opposes  
46 any commercial fishing in the Yukon River directed  
47 towards summer chum until we see -- I would say, at  
48 least a life cycle, give our salmon a chance to  
49 rebound.

50

0040

1                           And so with that I'll conclude and be  
2 available for any questions.

3  
4                           Thank you.

5  
6                           CHAIRMAN CHRISTIANSON: Thank you for  
7 taking the time to call in and testify today. Any  
8 comments from the Board or questions.

9  
10                           (No comments)

11  
12                           CHAIRMAN CHRISTIANSON: All right,  
13 appreciate that. Is there anyone else at this time,  
14 Robbin.

15  
16                           MS. LAVINE: There's one more person in  
17 the speaker's que. The last four digits are 2061, you  
18 may press star, six to unmute yourself. 2061. Go  
19 ahead, you may address the Board.

20  
21                           DR. WILLIAMS: Good afternoon.

22  
23                           MS. LAVINE: Yep.

24  
25                           DR. WILLIAMS: My name is Dr. Mike  
26 Williams from Akiak, Alaska along the Kuskokwim River  
27 and I'm serving as a Commissioner for the Kuskokwim  
28 River InterTribal Fish Commission. And I fully support  
29 24-01 as many have testified so far, and Chairmans Ulvi  
30 and Samuelson.

31  
32                           I really appreciate the Federal  
33 Subsistence Board accepting our special action request  
34 from Akiak Native Community for five seasons and that  
35 made a whole big difference on the Kuskokwim River.  
36 And we have worked very hard with those folks with 33  
37 communities, from Nikolai all the way down to Kipnuk,  
38 working together to make sure that our salmon are  
39 sustainable into the future and your approval of our  
40 special action request has made a lot of difference in  
41 our health and our way of life on the Kuskokwim River.

42  
43                           Again, all of the -- in this testimony  
44 provided a lot of data and the reasons why you need to  
45 take action. And, again, I appreciate your support for  
46 the Kuskokwim River over all these years and, of  
47 course, we have a formal MOU with U.S. Fish and  
48 Wildlife Service, which all of the communities signed  
49 on along with Association of Village Council Presidents  
50



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1 and Tanana Chiefs Conference. I really appreciate us  
2 working together with the Kuskokwim River InterTribal  
3 Fish Commission and the Yukon River InterTribal Fish  
4 Commission and I was fortunate to witness the signing  
5 of the documents in Tanana when the tribes on the river  
6 organized and we subsequently did that in the Kuskokwim  
7 River.

8

9 Thank you very much and, I, again, wish  
10 all of our relatives on the Kuskokwim and the Yukon  
11 River well as we depend on our fish for our health and  
12 well-being.

13

14 Thanks, that's my comment.

15

16 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
17 Williams. Any questions or comments from the Board.

18

19 (No comments)

20

21 CHAIRMAN CHRISTIANSON: Appreciate you  
22 taking the time to call in and show your support today.  
23 Robbin, next.

24

25 MS. LAVINE: One more person in the  
26 speaker's que, last four digits 1099. 1099 you may  
27 press star, six to unmute yourself.

28

29 (No comments)

30

31 MS. LAVINE: You need to press star,  
32 six to unmute yourself. There you go, hello.

33

34 MR. YATLIN: Can you hear me?

35

36 MS. LAVINE: Yep.

37

38 MR. YATLIN: Okay. My name is Ron  
39 Yatlin. I fish on the -- kind of at the beginning of  
40 the Yukon Flats, subsistence fisherman. And I'm in  
41 support of the special action request. And I'm really  
42 glad to see the Federal Subsistence Board get involved  
43 with the fisheries because for years it seems like we  
44 have no voice and when the State of Alaska opens  
45 commercial fishing it's commercial fishing at the mouth  
46 of the Yukon River. They have no idea that there's  
47 people living up river and they -- we should all be  
48 able to commercial fish if and when they do open it.  
49 And that is most important comment I want to make.

50

0042

1 Thank you.

2

3

CHAIRMAN CHRISTIANSON: Thank you. I appreciate you taking the time to call in today. Any questions or comments from the Board.

6

7

(No comments)

8

9

CHAIRMAN CHRISTIANSON: All right, I appreciate that. Robbin, you have the floor.

11

12

13

MS. LAVINE: Thank you, Mr. Chair. There are no more speakers in the speaker's que.

14

15

16

17

CHAIRMAN CHRISTIANSON: All right, we'll be moving on now to our Regional Advisory Council recommendations.

18

19

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28

MS. LAVINE: Thank you, Mr. Chair. The first Regional Advisory Council recommendation is for the Yukon Kuskokwim. Mr. Ray Oney did provide his testimony earlier. Mr. Oney, if you're online, could you please press star, six and address the Board, if they have any questions for you in regards to the Yukon Kuskokwim Subsistence Regional Advisory Council recommendation. So, Mr. Oney, if you are still with us press star, six to unmute and address the Board.

29

(No comments)

30

31

32

33

34

35

36

MS. LAVINE: Mr. Chair, Mr. Oney is not responding and as Board Member Pitka remarked earlier when he did provide his recommendation she wanted it noted for the record that this was provided. Oh, he might be on. Mr. Oney, are you on, can you address the Board.

37

38

MR. ONEY: Yes, can you hear me now?

39

40

MS. LAVINE: Yes, thank you. Go ahead.

41

42

43

44

45

46

47

48

49

50

MR. ONEY: Yeah, thank you. Yeah, I jumped the gun a little earlier today and that was my misunderstanding. But, yes, I did read the recommendation coming from the YKRAC on Special Action 24-01. And that will be entered into the record. I'll just go ahead and see if there's any comments coming from the Board at this time.

0043

1 MS. PITKA: So for the record, what was  
2 the YKRAC's recommendation? Sorry, I did not.....

3  
4 MR. ONEY: Okay. Okay, sorry, I'll go  
5 ahead and read the last paragraph of the recommendation  
6 coming from the YKRAC.

7  
8 We, at the March 8th meeting there in  
9 Anchorage, the YKRAC Council supports a closure to non-  
10 Federally-qualified users due to conservation concerns  
11 for the Yukon River salmon.

12  
13 Thank you.

14  
15 MS. PITKA: Thank you. Appreciate it.

16  
17 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
18 Oney. Any questions or comments from the Board.

19  
20 (No comments)

21  
22 CHAIRMAN CHRISTIANSON: Hearing none,  
23 we'll move on to the next RAC. Robbin.

24  
25 MS. LAVINE: Thank you, Mr. Chair. The  
26 next Regional Advisory Council to provide  
27 recommendation is the Western Interior. Mr. Chair, I  
28 believe Nissa Pilcher is on the line to provide that  
29 recommendation.

30  
31 MS. PILCHER: Yes, I am, Robbin. For  
32 the record this is Nissa Pilcher, Council Coordinator  
33 for the Western Interior Alaska Regional Advisory  
34 Council.

35  
36 The Council recognized that while there  
37 is not enough salmon in the Yukon River for the past  
38 several years to meet subsistence needs, in 2024, if  
39 there is enough salmon to warrant any subsistence  
40 opportunities the Federal in-season manager should take  
41 the lead to ensure that Federally-qualified rural  
42 subsistence users have priority on this resource. And  
43 they are in support of FSA24-01.

44  
45 CHAIRMAN CHRISTIANSON: Thank you. Any  
46 questions or comments from the Board.

47  
48 (No comments)

49  
50

0044

1 CHAIRMAN CHRISTIANSON: Hearing none,  
2 we'll move on to the next Regional Advisory Council  
3 recommendation. Robbin.

4

5 MS. LAVINE: Thank you, Mr. Chair. The  
6 next Regional Advisory Council recommendation is from  
7 the Eastern Interior, and I do believe Chair Charlie  
8 Wright is on the line to provide that recommendation.  
9 Charlie, if you are on, please press star, six to  
10 unmute and address the Board.

11

12 MR. WRIGHT: Can you hear me?

13

14 MS. LAVINE: Yes, we can Charlie.

15

16 MR. WRIGHT: Okay, very good.  
17 (Muffled) The Eastern Interior Council supported the  
18 Special Action Request FSA24-01 concerned about salmon  
19 populations in the Yukon River. Chinook salmon are  
20 nearing extirpation and we need to do everything we can  
21 to protect them. While there are unlikely to be an  
22 opening this year, (indiscernible - muffled and cutting  
23 out) eligible users to only Federally-qualified users.

24

25 And that is the end of the EIRAC  
26 recommendation. And I'd like to add something on at  
27 this time. The Eastern Interior (muffled - fading in  
28 and out and cutting out) no commercial fishing since --  
29 for 39 years (indiscernible - cutting out).....

30

31 MS. LAVINE: Charlie. Charlie, can you  
32 hear us.

33

34 (No comments)

35

36 MS. LAVINE: Charlie, you faded out as  
37 if you'd walked away from a microphone, can you rejoin  
38 us.

39

40 MR. WRIGHT: Can you hear me?

41

42 MS. LAVINE: Barely. Try again.

43

44 MR. WRIGHT: How about now?

45

46 MS. LAVINE: Yes, better.

47

48 MR. WRIGHT: Hello.

49

50

0045

1 MS. LAVINE: Can you start -- can you  
2 start from the beginning, your own comments, again,  
3 following your Council's recommendation. Thank you.

4  
5 MR. WRIGHT: Yes, I can, thank you.

6  
7 MS. LAVINE: Thank you.

8  
9 MR. WRIGHT: Okay. Our subsistence  
10 needs are not being met. In my area along the Yukon  
11 near Rampart we have not commercial -- had commercial  
12 fishing for 39 years so I guess it's easy to say we've  
13 lost everything. We're at the point of no other means.  
14 We have no commercial fishing. No fishing at all for  
15 salmon for a few years now. Our moose and caribou and  
16 bear numbers are really low. We have no means of  
17 passing on tradition and culture. The salmon culture  
18 on the Yukon River is going away. The whole ecosystem  
19 is collapsing as we speak. It's been studied and  
20 testified that wolves in the Denali Park area are --  
21 they're 25 percent of their food for the year would be  
22 salmon. So -- and it also affects all the other  
23 furbearer animals and the bears, the bees, and the blue  
24 flies and more I'm sure. Our whole ecosystem is in  
25 trouble and I don't know how long it can hold on before  
26 we start seeing really bad effects to that.

27  
28 We have no economy in our villages,  
29 from the Bering Sea to way up to the First Nations of  
30 Canada. To have fish on our tables, in our  
31 smokehouses, in our freezers is what people want. We  
32 want fish on the spawning ground so us, and our future  
33 generations can enjoy the healthy lifestyle of the  
34 salmon culture along our rivers.

35  
36 That is the end of my comments.

37  
38 Mr. Chair, thank you.

39  
40 CHAIRMAN CHRISTIANSON: Thank you,  
41 Charlie. Any questions or comments from the Board.

42  
43 (No comments)

44  
45 CHAIRMAN CHRISTIANSON: Thank you.  
46 That concludes the Regional Advisory comments, Robbin.

47  
48 MS. LAVINE: Oh, nope, Mr. Chair, I am  
49 very sorry I got my slides out of order. The final  
50

0046

1 Regional Advisory Council to provide a recommendation  
2 is for the Seward Peninsula. Gisela.

3

4 MS. CHAPA: Hi, good afternoon,  
5 everyone. For the record my name is Gisela Chapa. I  
6 am the Council Coordinator for the Seward Peninsula  
7 Regional Advisory Council.

8

9 And the Council met on March 8th, 2024  
10 in Anchorage, and at the time the Council voted to  
11 support Fisheries Special Action 24-01. The Council  
12 discussed how fishing being closed has caused hardships  
13 in the Yukon River and the Council supports the request  
14 to help fish populations in the area.

15

16 Thank you.

17

18 CHAIRMAN CHRISTIANSON: Thank you. Any  
19 questions or comments from the Board.

20

21 (No comments)

22

23 CHAIRMAN CHRISTIANSON: That concludes  
24 our Regional Advisory Council comments. We'll go ahead  
25 and open up the floor to the Alaska Department of Fish  
26 and Game comments. We'll call on Mr. Ben Mulligan, you  
27 have the floor.

28

29 (No comments)

30

31 CHAIRMAN CHRISTIANSON: Maybe we lost  
32 him. Is the State on, is Mr. Mulligan or a  
33 representative from the State on?

34

35 MS. LAVINE: I see Mr. Mulligan on.  
36 Ben, if you're able to provide State comments at this  
37 time, you may need to unmute yourself, press star, six,  
38 or unmute at the top of your screen if you've joined  
39 via Teams.

40

41 CHAIRMAN CHRISTIANSON: He said he's  
42 having trouble getting through.

43

44 MS. LAVINE: Ahh, uh-oh, uh.

45

46 CHAIRMAN CHRISTIANSON: So we'll wait  
47 for Ben.

48

49 MS. LAVINE: Right. Maybe the way to

50

0047

1 do it is -- yep, maybe try joining via Teams link.  
2 There's also an opportunity at the, yep, at the top of  
3 your screen, but we'll wait, Ben, if you can hang up  
4 and join us again, maybe that will work.

5

6 (Pause)

7

8 MS. LAVINE: Can't hear you.

9

10 (Pause)

11

12 MS. LAVINE: And I can't unmute you.  
13 Ben, can you like hop out and then try and join again.

14

15 MR. MULLIGAN: Yeah, the.....

16

17 MS. LAVINE: Oh, there you are, there  
18 you are, we got you -- oh, did we lose him. Darn it,  
19 we heard him and then he hung up.

20

21 (Pause)

22

23 MS. LAVINE: So for those of you  
24 waiting online, we are waiting for our State Liaison to  
25 the Board, Mr. Mulligan, to rejoin us and hopefully  
26 rejoin us with an open line.

27

28 (Pause)

29

30 MS. LAVINE: Oh, no, so for those of  
31 you who are not able to join us via Teams we have  
32 learned that Mr. Mulligan is having technical  
33 difficulties on his end, I would direct everyone in the  
34 public to our website, doi.gov.subsistence --  
35 /subsistence/board. The ADF&G comments on Special  
36 Action 24-01 is on our website as is the Staff analysis  
37 and the fact sheet. So until we hear back from Mr.  
38 Mulligan, you can review the State comments on our  
39 website.

40

41 (Pause)

42

43 MS. LAVINE: Mr. Chair, hopefully while  
44 we're waiting for Mr. Mulligan to rejoin us I can give  
45 you the InterAgency Staff Committee comment.

46

47 CHAIRMAN CHRISTIANSON: You have the  
48 floor, Robbin.

49

50

0048

1 MS. LAVINE: Thank you, Mr. Chair. The  
2 InterAgency Staff Committee provided their standard  
3 comment and it is as follows:

4  
5 The InterAgency Staff Committee found  
6 the analysis to be a thorough and accurate evaluation  
7 of the proposal -- the special action request, and that  
8 it provides sufficient basis for the Regional Advisory  
9 Council recommendations and the Federal Subsistence  
10 Board action on this special action request.

11  
12 Thank you, Mr. Board -- I mean thank  
13 you, Mr. Chair.

14  
15 (Laughter)

16  
17 CHAIRMAN CHRISTIANSON: I had to giggle  
18 on that one.

19  
20 MS. LAVINE: And Mr. Mulligan has not  
21 joined us yet.

22  
23 CHAIRMAN CHRISTIANSON: The floor is  
24 open at this time, if he doesn't come back, we will  
25 have Board discussion and questions or comments or  
26 additional feedback if the Board has it, this is your  
27 opportunity to do so.

28  
29 MR. BROWER: Mr. Chair.

30  
31 CHAIRMAN CHRISTIANSON: Yes, you have  
32 the floor Charlie.

33  
34 MR. BROWER: Is it possible just to ask  
35 some questions in regards to the modification versus  
36 OSM and the Yukon Kuskokwim Delta Regional Advisory  
37 Council's request?

38  
39 CHAIRMAN CHRISTIANSON: You have the  
40 floor, Charlie, yes, you can.

41  
42 MR. BROWER: Thank you. I have a  
43 question, the OSM modification is to -- with  
44 modification, reopen by Federal in-season manager,  
45 Federal public waters of the Yukon River drainage to  
46 the harvest of chinook, summer and fall chum and coho  
47 salmon except by Federally-recognized subsistence uses  
48 effective June 1, '24 to September 30, '24, Federal  
49 subsistence fishing schedule opening, closure and  
50



0049

1 fishing methods will be determined by the Federal  
2 fishing manager by OSM, then the Yukon Delta Regional  
3 Advisory, their modification is to Federal waters of  
4 the Yukon drainage except in District 1 water and that  
5 portion of from Black River drainage to the Naskonat  
6 Peninsula are closed to the harvest of chinook, summer  
7 and fall chum, coho except by Federally-recognized  
8 subsistence uses effective June 1, '24 through  
9 September 30th, '24, Federal subsistence fisheries  
10 schedule open, closure and fishing methods will be  
11 determined by the Federal fishery management and the  
12 OSM it doesn't have the District 1, Black River to the  
13 Naskonat Peninsula. I was just curious, is that OSM  
14 modification, will this be included from the Yukon  
15 Kuskokwim Delta Regional Advisory Council  
16 recommendation for the modification.

17

18 I'm just curious.

19

20 MS. KENNER: So Member -- hi, Charlie,  
21 this is Pippa Kenner for the record. So we did not  
22 include the YKDelta's modification.

23

24 MR. BROWER: Okay, thank you. I was  
25 just curious because there seems to be a little  
26 difference in both modifications. Thank you.

27

28 MS. KLEIN: Mr. Chair, this is Jill  
29 Klein with U.S. Fish and Wildlife Service.

30

31 CHAIRMAN CHRISTIANSON: Yes, Jill, you  
32 have the floor.

33

34 MS. KLEIN: Thank you. Yeah, I wanted  
35 to build on maybe what Charlie was just asking as well,  
36 if the -- if OSM Staff could share more information  
37 about the language they used in their modification.  
38 So, yeah, if they could explain kind of how that would  
39 work and what they mean to intend to happen with that  
40 language by the Federal manager?

41

42 MS. KENNER: Hi, Jill, this is Pippa  
43 Kenner with OSM, thanks for the question. I can't see  
44 anybody so I'm not sure if Cory could answer that but  
45 I'll go ahead and start.

46

47 So the way the special action is  
48 written it implies that the Board will close the river  
49 and thereby that kind of removes the Federal manager's  
50

0050

1 designated delegated authority to open the river if the  
2 Board has determined it will be closed from June  
3 through September. And so by adding that language in  
4 there, it gives the Federal in-season manager the  
5 ability to reopen the river to non-Federally-qualified  
6 users and uses if there's a run of salmon that comes in  
7 that exceeds that needed for subsistence. Otherwise,  
8 she might not have that flexibility and if she wanted  
9 to open she would need to go to the Board to get  
10 permission to do that.

11

12 MS. KLEIN: Through the Chair. Thank  
13 you, Pippa. So I have maybe another question. So that  
14 makes sense, thank you. So if I could just read the  
15 modification of OSM and then ask a question again.

16

17 So it's support FSA24-01 with  
18 modification to allow the Federal in-season manager to  
19 lift the closure to the harvest of chinook, summer  
20 chum, fall chum and coho salmon based on in-season run  
21 indicators of harvestable surplus beyond Federal  
22 subsistence harvest. And I wanted to ask a question  
23 about -- and maybe this might be a question for the in-  
24 season manager, but how is it intended that the manager  
25 would base that ability to reopen, so in-season run  
26 indicators makes sense, there's test fisheries, or  
27 Pilot Station sonar, but it also says indicators of a  
28 harvestable surplus beyond Federal subsistence harvest,  
29 and I was wondering maybe how the manager would  
30 determine that?

31

32 MS. KENNER: If possible, I would like  
33 to defer to the in-season manager or to Cory Graham,  
34 who presented with me.

35

36 MR. GRAHAM: Mr. Chair. Through the  
37 chair. Yeah, I would also like to defer that to the  
38 in-season manager, Holly Carroll.

39

40 MS. CARROLL: Mr. Chair. This is Holly  
41 Carroll, Federal In-Season Manager. I think these are  
42 really great questions and maybe -- I have a similar  
43 question actually. So in the way the OSM modification  
44 is written it makes it sound like I could only open the  
45 river when we have a harvestable surplus above Federal  
46 subsistence needs, but my understanding is that we will  
47 need to close all fishing on the river, even to  
48 Federally-qualified users until we know that we have a  
49 harvestable surplus for summer chum, and then I might  
50

0051

1 be faced with opening some fishing opportunities for  
2 Federally-qualified users for summer chum. And so that  
3 would be based on in-season run abundance indicating  
4 that we are projected to meet our escapement goals and  
5 that there is a harvestable surplus above what is  
6 needed to meet those escapement goals.

7  
8 So I guess I would also wonder if your  
9 motion, as written, will allow me to provide dipnet  
10 subsistence fishing for Federally-qualified users,  
11 because as written it only says I could open it up once  
12 there's a harvestable surplus above what's needed for  
13 Federal subsistence needs.

14  
15 MS. KENNER: So through the Chair, this  
16 is Pippa Kenner with OSM. So this doesn't influence  
17 your ability, Holly, to open and close for Federally-  
18 qualified subsistence users. The modification to the  
19 proposal is only to allow you to open to non-  
20 subsistence uses.

21  
22 MS. CARROLL: Through the Chair. Thank  
23 you. I guess I would just ask Jill if that answered  
24 your question.

25  
26 MS. KLEIN: Through the Chair. So that  
27 is how -- thank you, Holly and Pippa. That is how I  
28 also understood it to mean that this language would  
29 only be for when the Federal manager would consider  
30 opening to non-Federally-qualified users and/or other  
31 uses of salmon but I was still curious how this  
32 determination would be, as a harvestable surplus beyond  
33 Federal subsistence harvest would be determined, like  
34 what kind of information, maybe just to clarify on the  
35 record, what kind of information you get in-season  
36 related to harvest for Federal subsistence users that  
37 you can use for management decisionmaking, if there was  
38 a harvestable surplus.

39  
40 MS. CARROLL: Okay, thank you. Through  
41 the Chair. I understand the question now. So if we  
42 are talking about the scenario where I would pull all  
43 Federal management and open it up to non-Federally-  
44 qualified users, I think we would have to see that all  
45 escapement goals would be met for the salmon species of  
46 that season. So for instance maybe I might project to  
47 meet escapement goals for one species but if I'm not  
48 projected to meet the goals for the other we couldn't  
49 do that. So it'd have to be for all the salmon in that  
50



0053

1 other questions or clarifications from the Board or  
2 their designees.

3

4 (No comments)

5

6 CHAIRMAN CHRISTIANSON: We'll also  
7 offer this time if the State has gotten back on, an  
8 opportunity.

9

10 MR. MULLIGAN: Mr. Chair, can you hear  
11 me?

12

13 CHAIRMAN CHRISTIANSON: Yes, I can hear  
14 you.

15

16 MR. MULLIGAN: Thank you, Mr. Chair.  
17 And my apologies for any delay that I've caused this  
18 meeting because of my technical difficulties on my  
19 mind. I had to reset my system and it chose to do an  
20 update at the same time so, again, my apologies.

21

22 I know Robbin has pointed you to our  
23 written comments but just to make a couple of points.

24

25 You know, one, is the Department does  
26 oppose the special action and at this time we feel we  
27 have the adequate tools in the toolbox to  
28 conservatively manage salmon species on the Yukon for  
29 this season and we are still named as the responsible  
30 management entity under Chapter 8 of the Pacific Salmon  
31 Treaty charged with making sure that we're meeting our  
32 obligations at the border and we have our  
33 Constitutional and Statutory mandates to meet our  
34 obligations here at home.

35

36 And, you know, in our comments, you  
37 know, we're looking at how the season's going to look  
38 and Ms. Carroll has already referenced how the season  
39 will go and that's, you know, what we're looking at as  
40 well, and we're going to be conservative with what  
41 we're looking at and hopefully there's going to be some  
42 opportunity that potentially we're looking at for  
43 summer chum that could come for subsistence users and  
44 then around July we'll be looking for opportunities  
45 potentially on fall, but that's a big what if. But,  
46 you know, we're going to do our part to conservatively  
47 manage these runs.

48

49 Thank you, Mr. Chair.

50

0054

1 CHAIRMAN CHRISTIANSON: Thank you, Mr.  
2 Mulligan. Any questions from the Board for the State.

3  
4 (No comments)

5  
6 CHAIRMAN CHRISTIANSON: All right,  
7 appreciate it. Glad you got your technical  
8 difficulties taken care of. All right, Board, that  
9 opens up the floor for any final questions or  
10 deliberation or the floor is open for a motion.

11  
12 MS. LAVINE: Mr. Chair, this is Robbin.

13  
14 CHAIRMAN CHRISTIANSON: Yes, Robbin.

15  
16 MS. LAVINE: Thank you, Mr. Chair.  
17 It's my understanding that the Forest Service is  
18 attempting to ask a question of Staff or the liaisons  
19 so if we could just hold on a moment he's going to try  
20 to join via a different avenue. So if we could just  
21 hold on one moment.

22  
23 (Pause)

24  
25 MS. LAVINE: Hold on. If there are  
26 other questions before a motion is made, please  
27 continue with the discussion.

28  
29 CHAIRMAN CHRISTIANSON: I think we were  
30 finished with that, we were just going to wait for the  
31 Forest Service member.

32  
33 MS. LAVINE: Okay, just one moment.  
34 Yep, hang on, I may need to try to send him another  
35 invite.

36  
37 (Pause)

38  
39 MS. KLEIN: Mr. Chair, this is Jill  
40 Klein with the U.S. Fish and Wildlife Service. In the  
41 meantime I could just make a comment.

42  
43 CHAIRMAN CHRISTIANSON: Yes, Jill, you  
44 have the floor.

45  
46 MS. KLEIN: Yeah, I just wanted to -- I  
47 didn't get a chance when everyone was done with public  
48 testimony, but I just wanted to thank everyone who did  
49 call in for their testimony and I feel like the people  
50

0055

1 that called in made really good and important points  
2 and appreciate the Yukon River and the Tribal Fish  
3 Commission for calling in and sharing some additional  
4 information about why there (indiscernible) closure and  
5 what it means to them. And also appreciate hearing  
6 from people on the Kuskokwim River that called in and  
7 sharing and speaking about their experiences that  
8 they've had with the memorandum of understanding and  
9 working with the Yukon Kuskokwim Delta National  
10 Wildlife Refuge. And, yeah, everyone else also I want  
11 to thank you for your comments.

12

13 CHAIRMAN CHRISTIANSON: Thank you for  
14 that Jill. I echo that. The floor is.....

15

16 MR. RISDAHL: Mr. Chair.

17

18 CHAIRMAN CHRISTIANSON: Yes, you have  
19 the floor.

20

21 MR. RISDAHL: This is Greg Risdahl with  
22 the Forest Service. I'm really sorry, I've been trying  
23 to get through but my phone, I could not apparently  
24 unmute it.

25

26 So I have a question and it kind of  
27 relates back to what Charlie originally asked and that  
28 was I wasn't exactly sure why the OSM modification was  
29 needed because if you look at the delegation of  
30 authority letter that the in-season manager has there  
31 on the Yukon, let me pull it up here, it states  
32 specifically that the fisheries and aquatic branch  
33 manager has the delegated authority to open or close  
34 Federal subsistence fishing periods or areas provided  
35 under codified regulations to specify methods and means  
36 and to set harvest and possession limits for Federal  
37 subsistence fisheries. This delegation also permits  
38 the fisheries and aquatic branch manager to issue  
39 special actions to close and reopen Federal public  
40 waters to non-subsistence fishing.

41

42 So I'm not quite sure why we need the  
43 modification that was noted by OSM.

44

45 Thank you, Mr. Chair.

46

47 MS. KENNER: Mr. Chair.

48

49 CHAIRMAN CHRISTIANSON: Yes, go ahead.

50

0056

1 MS. KENNER: Yeah, this is Pippa, again,  
2 for the record. So thanks Greg for that question.  
3 That modification is there to clarify exactly what you  
4 just said and to make sure that now everybody is aware  
5 of it. There have been some issues with that in the  
6 past that, once the Board acts, it removes its  
7 delegated authority when the Board says the river will  
8 be closed from June through September, it's just to  
9 maintain more control in the in-season manager's  
10 toolbox. There's no anticipation that there will  
11 actually be fishing, but it's to clarify that the  
12 Federal manager will still be managing the fishery.

13  
14 Thank you.

15  
16 For non-Federally-qualified as well as  
17 Federally-qualified.

18  
19 Thank you.

20  
21 CHAIRMAN CHRISTIANSON: Any further  
22 Board questions or discussion before we call for a  
23 Board motion.

24  
25 (No comments)

26  
27 CHAIRMAN CHRISTIANSON: The floor is  
28 open for a motion.

29  
30 MS. KLEIN: Mr. Chair, this is Jill  
31 Klein with the U.S. Fish and Wildlife Service. Can you  
32 hear me?

33  
34 CHAIRMAN CHRISTIANSON: Yes, you have  
35 the floor, Jill.

36  
37 MS. KLEIN: All right, thank you.  
38 Okay. So the Service would like to make a motion to  
39 adopt Fisheries Special Action, FSA24-01 and if I get a  
40 second I will explain why I intend to support with the  
41 OSM modification to allow the Federal in-season manager  
42 to lift the closure to the harvest of chinook, summer  
43 chum, fall chum, or coho salmon based on in-season run  
44 indicators of harvestable surplus beyond Federal  
45 subsistence harvest.

46  
47 MR. BROWER: Second.

48  
49 MS. KLEIN: Okay, thanks, Charlie.

50



0057

1 I'll just read into the record what the modified  
2 regulation should read which is related to the  
3 subsistence fishing taking of fish in the Yukon  
4 Northern area unless reopened by the Federal in-season  
5 manager, Federal public waters of the Yukon River  
6 drainage are closed to the harvest of chinook, summer  
7 and fall chum and coho salmon except by Federally-  
8 qualified subsistence users effective June 1, 2024  
9 through September 30, 2024. Federal subsistence  
10 fishing schedules, openings, closures and fishing  
11 methods will be determined by the Federal fisheries  
12 manager.

13

14                   As we heard in the analysis, chinook  
15 salmon forecast for 2024 are well below average and  
16 unlikely to meet escapement goals in the Alaskan  
17 portion of the drainage. The Canadian chinook salmon  
18 run forecast is below the newly agreed to US/Canada  
19 Border passage objective of 71,000 fish indicating the  
20 need for conservation. No escapement goals have been  
21 met for chinook salmon since 2019 and the Canadian  
22 escapement goal was not met for the fifth consecutive  
23 year in 2023.

24

25                   Chum salmon runs have improved and the  
26 outlook for summer chum salmon is likely to meet or  
27 escape the drainage-wide escapement goal of 500,000 to  
28 1.2 million fish, however, summer chum salmon run  
29 concurrently with the chinook salmon. The proposed  
30 regulatory language and intent of the motion is to  
31 allow the Federal manager to determine the fishing  
32 schedules, openings, closures and fishing methods based  
33 on run sizes in-season and in accordance with Title  
34 VIII of ANILCA. In this case of the summer chum  
35 overlapping with the chinook salmon run, this may  
36 enable selective gear type openings for summer chum  
37 salmon that are timed to conserve chinook salmon.

38

39                   The forecast for fall chum salmon  
40 currently indicates that the mainstem fishing of fall  
41 chum is likely to be closed or restricted to protect  
42 the very weak Canadian origin stock which is not  
43 projected to meet escapement goals. As we heard this  
44 will be reevaluated mid-July based on the in-season  
45 abundance of summer chum run size.

46

47                   The outlook for coho salmon is also  
48 anticipated to be below average and, again, the Federal  
49 manager will determine fishing schedules, openings,  
50

50

0058

1 closures and fishing methods in this case as it relates  
2 to any overlap with the fall chum salmon.

3

4

5 According to the analysis by OSM,  
6 subsistence salmon harvest estimates since 2019 are by  
7 far the lowest in the historical record since 1993.  
8 The continued below average forecast for most Yukon  
9 River salmon species if there is a harvestable surplus  
10 available determined by the Federal in-season manager a  
11 meaningful priority for Federally-qualified subsistence  
12 users is necessary to continue subsistence uses of  
13 salmon for fishing families along the Yukon River.

13

14

15 The Seward Peninsula, Western Interior  
16 and Eastern Interior Regional Advisory Councils all  
17 recommended supporting the special action because there  
18 has not been enough salmon in recent years to meet  
19 subsistence needs. As we've heard this has caused  
20 hardship along the Yukon River and there is a concern  
21 for conserving healthy populations of salmon as well as  
22 healthy lifestyles and cultures along the Yukon River.

22

23

24 The Yukon Kuskokwim Delta Regional  
25 Advisory Council recommended supporting the special  
26 action with a modification to exclude a portion of  
27 District 1 that includes the freshwaters draining into  
28 the Bering Sea between the Blazck River and Naskonat  
29 Peninsula also known as the Southern Coastal District.

29

30

31 The Board did hear -- well, we have  
32 heard from testimony requesting to leave the South  
33 Coastal area open, during the public hearing we heard  
34 that and from the YKRAC Council, and we heard from them  
35 that salmon that are harvested in that area are not  
36 bound for the Yukon River. We have reviewed the two  
37 historical studies that did show at least some tagged  
38 fish from this area going into the Yukon River and  
39 traditional and local knowledge that people have in  
40 this area is valuable, however, we don't feel we have  
41 enough information to determine which streams do and do  
42 not have spawning salmon. Furthermore, we don't have  
43 data on genetic origin from salmon harvested in this  
44 area. For these reasons we cannot justify leaving the  
45 inland streams or the coastal rivers open due to  
46 conservation concerns for chinook and fall chum salmon.

46

47

48 As stated in the OSM justification, a  
49 closure to the harvest of chinook, chum and coho salmon  
50 by non-Federally-qualified users and uses based on

50

0059

1 ANILCA Section .815 is necessary for the conservation  
2 of healthy populations of Yukon River chinook, summer  
3 and fall chum and coho salmon and to continue the  
4 subsistence uses of these resources. However, the  
5 Federal in-season manager may rescind the Board's  
6 closure if it is no longer needed for conservation or  
7 the continuation of Federal Subsistence Board needs.

8

9

Thank you, Mr. Chair.

10

11

12

13

14

CHAIRMAN CHRISTIANSON: Thank you,  
Jill. Any questions, comments or discussion from the  
Board.

15

16

(No comments)

17

18

19

CHAIRMAN CHRISTIANSON: Any further  
deliberation.

20

21

(No comments)

22

23

CHAIRMAN CHRISTIANSON: Call for the  
question.

24

25

MS. PITKA: Question.

26

27

28

CHAIRMAN CHRISTIANSON: Question's been  
called, could we do roll call please.

29

30

MS. HOWARD: Certainly, Mr. Chair.

31

32

So I will start with the maker of the  
motion, Fish and Wildlife Service Jill Klein.

33

34

MS. KLEIN: Support.

35

36

MS. HOWARD: Thank you, Jill.

37

38

U.S. Forest Service, Greg Risdahl.

39

40

MR. RISDAHL: Mr. Chair.

41

42

CHAIRMAN CHRISTIANSON: Yes.

43

44

MR. RISDAHL: The Forest Service  
supports Fisheries Special Action FSA24-01 as submitted  
by the Yukon River InterTribal Fish Commission that  
requests that the Board close the Federal public waters  
of the Yukon River drainage to the harvest of chinook,

45

46

47

48

49

50

0060

1 summer and fall chum and coho salmon except by  
2 Federally-qualified subsistence users in 2024 and to  
3 give the Federal in-season fisheries manager delegated  
4 authority to schedule subsistence fisheries, openings,  
5 closures and fishing methods within Federal waters.

6  
7                   The Forest Service also supports the  
8 Fish and Wildlife Service modification to allow the  
9 Yukon River Federal in-season manager to lift the  
10 closure to the harvest of chinook, summer chum, fall  
11 chum or coho salmon when it is no longer necessary for  
12 conservation or the continuation of subsistence uses.  
13 As the Yukon River InterTribal Fish Commission noted in  
14 their temporary special action request, chinook, summer  
15 and fall chum and coho salmon populations on the Yukon  
16 River have declined steeply in recent years from 2021  
17 to 2023 the escapement goals for the chinook and chum  
18 have not been reached. In addition, the U.S.  
19 obligations for fall chum and chinook salmon escapement  
20 and the US/Canada International Salmon Treaty have not  
21 been met for the last five years. The drastic declines  
22 in these salmon species beginning in 2019 have resulted  
23 in no harvestable surplus available to subsistence  
24 users along the Yukon River in 2021 and 2022 and only  
25 very limited harvest opportunities in 2023. Since May  
26 4th, 2022 when the Federal Subsistence Board voted  
27 unanimously to support FSA22-01, 02, 03 and 04 as  
28 modified by the Western Interior, Eastern Interior and  
29 Seward Peninsula Subsistence Regional Advisory Councils  
30 to assume fisheries management of the Federal waters of  
31 the Yukon River, including for coho salmon there has  
32 been no significant improvement in the stock status of  
33 these salmon populations. In addition, based on the  
34 2024 preseason forecast projected, run strength for  
35 chinook and chum salmon runs, there's no convincing  
36 data to indicate there will be adequate salmon to  
37 provide a harvestable surplus to meet customary and  
38 traditional harvest needs of Federally-qualified  
39 subsistence users along the Yukon River.

40  
41                   The Federal Subsistence Board gave the  
42 Northern Alaska Fish and Wildlife Field Office Branch  
43 Manager for fisheries and aquatic resources, shortened  
44 to fisheries and aquatic branch manager, the delegated  
45 authority to issue emergency and temporary special  
46 actions, if necessary, to ensure the conservation of  
47 health fish populations, to conserve subsistence uses  
48 of fish and for the continued viability of fish  
49 populations or for public safety reasons. More  
50

0061

1 specifically under the scope of delegation, this  
2 delegation permits the fisheries and aquatic branch  
3 manager to issue special actions to open or close  
4 Federal subsistence fishing periods or areas provided  
5 under codified regulations to specify methods and means  
6 and to set harvest and possession limits for Federal  
7 subsistence fisheries. This delegation also permits  
8 the fisheries and aquatic branch manager to issue  
9 special actions to close and reopen Federal public  
10 waters to non-subsistence fishing.

11

12 The Forest Service believes that it's  
13 necessary at this time for the fisheries and aquatic  
14 branch manager, through delegated authority by the  
15 Federal Subsistence Board to restrict salmon fishing to  
16 non-Federally-qualified users on the Yukon River much  
17 like what the in-season manager has been doing on the  
18 Kuskokwim River for the following reasons.

19

20 Conservation concerns for chinook, chum  
21 and coho populations for the continuation of  
22 subsistence uses and to provide for a subsistence  
23 priority for Federally-qualified subsistence users.

24

25 Thank you, Mr. Chair.

26

27 CHAIRMAN CHRISTIANSON: Thank.....

28

29 MS. HOWARD: Thank you, Mr. Risdahl.

30

31 CHAIRMAN CHRISTIANSON: .....you.

32

33 MS. HOWARD: National Park Service  
34 Sarah Creachbaum.

35

36 MS. CREACHBAUM: Mr. Chair. The  
37 National Park Service supports Fisheries Special Action  
38 FSA24-01 with the OSM modification for the reasons so  
39 thoroughly and thoughtfully stated by the U.S. Fish and  
40 Wildlife Service and the U.S. Forest Service.

41

42 This motion also -- or, I'm sorry --  
43 this action also supports the recommendations of the  
44 Seward Peninsula, Western Interior and Eastern Interior  
45 Subsistence Regional Advisory Councils and partially  
46 supports the recommendation of the Yukon Kuskokwim  
47 Delta Council.

48

49 There is a clear conservation concern,

50

0062

1 no escapement goals have been met for chinook salmon  
2 since 2019 and the Canadian escapement goal was not met  
3 for the fifth consecutive year in 2023.

4  
5 Chinook salmon forecast for 2024 are  
6 well below average and are unlikely to meet escapement  
7 goals in the Alaska portion of the drainage. According  
8 to the analysis, subsistence salmon harvest estimates  
9 since 2019 are by far the lowest in the historical  
10 record since 1991. Yukon subsistence communities have  
11 been working together on salmon conservation efforts  
12 for many years now and Yukon subsistence salmon  
13 fisheries have been severely restricted since 2021  
14 resulting in extreme hardships, food insecurity and  
15 continued loss of cultural practices. But the ongoing  
16 below average returns for most Yukon River salmon  
17 species, if there is a harvestable surplus available  
18 determined by the Federal in-season manager a  
19 meaningful priority for Federally-qualified subsistence  
20 users is necessary to continue subsistence uses of  
21 salmon for fishing families along the Yukon River.

22  
23 Based on Section .815 of ANILCA closure  
24 to the harvest of chinook, chum and coho salmon by non-  
25 Federally-qualified users and uses is necessary for the  
26 conservation of healthy populations of Yukon chinook,  
27 summer and fall chum and coho salmon and to continue  
28 subsistence uses of these resources. The proposed  
29 regulatory language will allow the Federal manager to  
30 determine fishing schedules, openings, closures and  
31 fishing methods based on run size in accordance with  
32 Title VIII of ANILCA if they determine that run returns  
33 can support selective subsistence salmon harvest while  
34 managing for conservation.

35  
36 Further, the modification allows that  
37 if the Federal in-season manager determines the closure  
38 is no longer needed for conservation or for the  
39 continuation of subsistence uses, the Federal in-season  
40 manager may rescind the Board's closure.

41  
42 Thank you, Mr. Chair.

43  
44 CHAIRMAN CHRISTIANSON: Thank you.

45  
46 MS. HOWARD: Thank you, Member  
47 Creachbaum.

48  
49 Next, let's go to the Bureau of Land  
50

0063

1 Management, Steve Cohn.

2

3 MR. COHN: Thank you, Mr. Chair. BLM  
4 supports FSA24-01 as modified by OSM for the reasons  
5 given by the Fish and Wildlife Service.

6

7 MS. HOWARD: Thank you, Member Cohn.

8

9 Bureau of Indian Affairs, Glenn Chen.

10

11 MR. CHEN: The BIA supports the motion  
12 and votes to adopt Fisheries Special Action 24-01 as  
13 modified by the Office of Subsistence Management.

14

15 And as we heard during the public  
16 testimony, which there was a lot of, as well as tribal  
17 and ANCSA consultation and at the various meetings of  
18 the affected Regional Advisory Councils the declines in  
19 the Yukon River salmon have had major impacts on food  
20 security and the traditions, cultures of our tribal  
21 constituents. We, therefore, concur with the  
22 justification provided by the Fish and Wildlife Service  
23 and feel that this action would be helpful to meet the  
24 subsistence needs of Federal rural users.

25

26 Quyana.

27

28 MS. HOWARD: Thank you.

29

30 Public Member Rhonda Pitka.

31

32 MS. PITKA: Yes, I support as so  
33 adequately explained by my colleagues before me, but  
34 also in deference to the Regional Advisory Councils and  
35 to provide continued subsistence uses and to protect  
36 the rural -- to provide for rural subsistence priority.

37

38 Thank you.

39

40 MS. HOWARD: Thank you, Chief Pitka.

41

42 Public Member Charlie Brower.

43

44 MR. BROWER: Thank you. I support  
45 FSA24-01 with modification by OSM and also from the  
46 Regional Advisory Councils, from the Yukon Kuskokwim,  
47 Western Interior, Seward Peninsula and Eastern Interior  
48 as presented.

49

50

0064

1 Thank you.

2

3 MS. HOWARD: Thank you, Member Brower.

4

5 And Chair Christianson.

6

7 CHAIRMAN CHRISTIANSON: I support as  
8 stated by the OSM conclusion and supported by the  
9 Regional Advisory Councils.

10

11 And all the public testimony we  
12 received today we thank you for calling in, the  
13 Commission, the people who work on the InterTribal  
14 Commission and all the relationships in between all  
15 that and we just hope that this can work out for  
16 everybody and hope to continue to just do the best we  
17 can, so thank, you, I support.

18

19 MS. HOWARD: Thank you, Chairman  
20 Christianson. With your vote, the motion to adopt  
21 FSA24-01 with OSM modification passes unanimously.

22

23 CHAIRMAN CHRISTIANSON: Well, I think  
24 that concludes our meeting for the day and I appreciate  
25 all the work from the Staff. I appreciate everyone  
26 calling in and all of the people who made this  
27 possible. So with that I open up the floor for a  
28 motion to adjourn.

29

30 MR. BROWER: So moved.

31

32 MR. RISDAHL: Second.

33

34 CHAIRMAN CHRISTIANSON: All right,  
35 hearing no opposition to the motion to adjourn, again  
36 appreciate all your guys service and have a good day.

37

38 MS. PITKA: Thank you, have a good day.

39

40 (Off record)

41

42 (END OF PROCEEDINGS)

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46

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