



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Any National Wildlife Refuge

1234 Any Street

City, Alaska 99xxx-xxxx



In Reply Refer To:

Memorandum

To: Chair, Federal Subsistence Board

From: Kuskokwim River Federal In-Season Manager, Yukon Delta National Wildlife Refuge ^{BB}

Subject: Kuskokwim River Coho Salmon Management Intentions

Date: August 16, 2022

Considering recent updates on the status of the Coho Salmon run on the Kuskokwim River the Refuge Manager at Yukon Delta National Wildlife Refuge (YDNWR), issues this letter to serve as notice of our current Kuskokwim River Coho Salmon intentions.

On July 21, 2022 a letter was issued to the Federal Subsistence Board (FSB) and other partners that gave notice of rescinding all Emergency Special Actions for the protection of Chinook and Chum Salmon for the Lower Kuskokwim River. Since that date, the YDNWR staff has consulted regularly with the Alaska Department of Fish and Game (ADF&G) and the Kuskokwim River Inter-Tribal Fish Commission (KRITFC) on the Coho Salmon situation. At the July 27th meeting of the ADF&G hosted “Kuskokwim River Salmon Management Working Group” (Working Group), the State and Working Group members supported waiting to hold further meetings until August 10th. Their decision was based on run timing and waiting for more information before deciding whether the Coho Salmon run was weak.

At the August 10th Working Group Meeting, the ADF&G area manager proposed leaving the river open to subsistence fishing, but that he recommended closing the river to all means and methods if Coho Salmon numbers did not improve by August 15th. The proposed closure would last until Coho Salmon numbers met escapement at the Kogruklu River weir or September 30th (whichever came first). At that meeting, the Working Group voted in favor of federal closure of the river, rather than having the closure from ADF&G, to promote conservation and protect some opportunity for local federally qualified subsistence users to fish.

Based on available information with 80% of the run past Bethel, the 2022 Kuskokwim River Coho Salmon run is critically low. As of August 15th, the 2022 run is the lowest run in the last 23 years based on Bethel Test Fishery (BTF) data (Figure 1). As of August 15, 2022, the Kogruklu and Kwethluk River Weirs had record-low numbers of Coho Salmon passage. The Kwethluk Weir has counted less than 250 Coho Salmon in 2022, far below the lower end of the escapement goal of 19,000 Coho Salmon. The Coho Salmon fishery has steeply declined in the past four years (Figure 2), and BTF average cumulative CPUE in recent years has declined by 46% compared to the average cumulative catch-per-unit-effort (CPUE) for the period 2000-2017.

Furthermore, subsistence harvests of Coho Salmon in 2018 and in 2021 failed to meet the bottom end of the range for the Amounts Necessary for Subsistence (ANS) as established by the Alaska

Board of Fisheries. (The current ANS is a range from 27,400 to 57,600 Coho Salmon.) This is a marked decline from the 1990s, when the Coho Salmon run supported a commercial harvest of approximately 400,000 Coho Salmon per year.

The fisheries management team at the YDNWR certainly has concern over the Coho Salmon run, as well as for the continuation of subsistence uses of Coho Salmon by federally qualified subsistence users, so we drafted language for an Emergency Special Action. However, in discussions with the KRITFC and ADF&G it became apparent that a federal action may not be necessary.

On August 16th the YDNWR met with the KRITFC, and there was consensus to continue monitoring the Coho Salmon run but to not issue any federal restrictions at this time. The decision to not apply a federal closure was based on:

1. The ADF&G closure announced on August 15th is more flexible to the local subsistence user's needs than originally proposed. It allowed for subsistence fishing (for non-salmon species) to continue in slack water areas and kept the "non-Salmon spawning tributaries" to remain open to fishing with all gear types and will end on September 15th (two weeks earlier than originally proposed).
2. The Coho Salmon numbers are so low, the YDNWR and KRITFC could not currently estimate a date to allow federally qualified subsistence users to have a harvest opportunity. At this point, the ADF&G closure would have the same effect as a federal closure and with no openings there can be no priority for federally qualified subsistence users. If an opportunity arises, YDNWR may announce a special action to prioritize federally qualified subsistence users.
3. Salmon management into September is an unfortunate consequence of the current salmon conservation crisis facing Alaskans. Although this was expected to some extent, the current Coho Salmon numbers are surprising to most Kuskokwim River biologists. The drastic downturn in Coho Salmon numbers has led to a realization that the YDNWR does not have the resources needed to manage fishing access into September. More staff are needed to manage salmon from June 1st to September 30th, which may be the "new normal" on the Kuskokwim River.

In closing, in response to a very poor 2022 Coho Salmon run, YDNWR and tribal partners at KRITFC continue to support a conservative approach to salmon management that allows for some subsistence use and will continue to monitor the Coho Salmon run as it progresses. The YDNWR Fisheries Management Team also wishes to underscore the Salmon crises the headwaters communities of Telida, Nikolai, McGrath, and Takotna and upper middle river communities of Lime Village, Stony River, Sleetmute, Red Devil, Georgetown, and Crooked Creek these communities are experiencing with the current Coho Salmon closures.

Questions can be directed to the YDNWR Fisheries Management Team which consists of Spencer Rearden (Supervisory Biologist), Aaron Moses (Subsistence Specialist), Christopher Tulik (Lead Refuge Information Technician), Emmitt Nicori (Refuge Information Technician), and me: Spencer_Rearden@fws.gov, Aaron_Moses@fws.gov, Christopher_Tulik@fws.gov, Emmitt_Nicori@fws.gov, or Boyd_Blihovde@fws.gov



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Attachment(s) (if applicable)