



KUSKOKWIM RIVER INTER TRIBAL FISH COMMISSION

"Working Together to ensure our fish and people remain healthy."

Nick Kameroff, Chairman

Mary Peltola, Executive Director

Telida
Nikolai
Takotna
McGrath
Lime Village
Stony River
Sleetmute
Red Devil
Georgetown
Crooked Creek
Napaimute
Chuathbaluk
Aniak
Upper Kalskag
Lower Kalskag
Tuluksak
Akiak
Akiachak
Kwethluk
Bethel
Oscarville
Napaskiak
Napakiak
Kasigluk
Atmautluak
Nunapitchuk
Tuntutuliak
Eek
Quinhagak
Kongiganak
Kwigillingok
Kipnuk
Chefornak

May 21, 2018

Ken Stahlnecker
Refuge Manager
Yukon Delta National Wildlife Refuge
PO Box 346
Bethel, AK 99559

Re: Emergency Special Action to Close the Kuskokwim River

Dear Ken:

The Kuskokwim Inter-Tribal Fish Commission (the KRITFC) requests that you use your delegated authority to issue an emergency special action immediately closing the Kuskokwim River to the harvest of Chinook salmon, placing those waters under federal management, and closing the anticipated weekly 4" mesh non-salmon openings scheduled to begin between May 25 and June 11. An emergency special action is necessary to ensure continued viability of and subsistence opportunity for Chinook salmon.

During the Federal Subsistence Board's (the Board) meeting on May 16-17, 2018, the Board heard testimony from federally qualified users about their concerns for Chinook salmon conservation and reduced subsistence opportunities. Similar testimony was incorporated into the record through the Office of Subsistence Management's Staff Analysis, as well as the Yukon Delta Regional Advisory Council. ADFG validated these concerns when it confirmed that during its 4" mesh non-salmon openings, anticipated to occur between May 25 and June 11, it both expected and would permit bycatch of Chinook salmon. Despite the conservation and subsistence concerns raised by this testimony, the Board determined that a federal closure of the Kuskokwim River to the harvest of Chinook salmon should begin on June 12, 2018. However, the Board, through its U.S. Fish and Wildlife Service member Karen Clark, also committed that it would act, either through the Board or through you, the In-Season Manager, to address any additional conservation and reduced subsistence opportunity concerns raised by the KRITFC.

Immediately before the Board met, the Alaska Department of Fish and Game (the ADFG) released a revised summary of run reconstruction data significantly reducing the run estimates for Chinook salmon returning to the Kuskokwim River. When forecasting pre-season Chinook salmon returns, ADFG uses a prior-year approach in which the point estimates for the prior year serve as the midpoint of the forecast. The uncertainty in the forecast is then expressed as the average difference between the forecast and the post-season return estimate for the previous seven years, the maximum age of Kuskokwim Chinook salmon. ADFG's initial run reconstruction model, released in March 2018, estimated a total run of 166,863 Chinook salmon with the forecast assuming a range of