



KUSKOKWIM RIVER INTER TRIBAL FISH COMMISSION

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

Nick Kameroff, President

Mary Peltola, Executive Director

130,668 and 213,085 Chinook salmon returning to the River. The Board used this information when it approved FSA 18-01 (with modifications) to start on June 12, 2018.

However, in ADFG's updated run reconstruction model, the midpoint of the total forecasted run of Chinook salmon is now 133,267 (95% CI), with a forecast range of 116,000 to 150,000 Chinook salmon returning to the River. This new data was not considered by the Board when it approved a modified version of FSA18-01.¹ ADFG's new forecast data further reduces the Chinook salmon harvest projection from 40,000 to 25,000.² It is clear that subsistence needs will not be met. This drastic reduction in the run estimate and anticipated harvest raises severe concerns regarding conservation of Chinook salmon and reduced subsistence opportunities to harvest Chinook salmon, and necessitates emergency action placing the Kuskokwim River under federal management immediately.

During the Board meeting, Board members, including the U.S. Fish and Wildlife Service member, and you through your testimony at the meeting, all committed to take action in the event of additional subsistence and conservation concerns. The emergency special action sought by the KRITFC is required not only by the federal government's duties under ANILCA to protect subsistence opportunities and conserve Chinook salmon, but also by the obligations established by the Memorandum of Understanding between the KRITFC and the U.S. Fish and Wildlife Service. In light of that commitment and ADFG's revised run estimate, it is both appropriate and necessary for you to use your delegated authority to issue an emergency special action immediately closing the federal waters of the Kuskokwim River to the harvest of Chinook salmon and placing those waters under federal management. The emergency special action must also close all of the anticipated 4" mesh openings scheduled to occur between May 25 and June 11.

Sincerely,

Mary Peltola
Executive Director, KRITFC

Cc: Karen Clark
Deputy Regional Director
U.S. Fish and Wildlife Service

Gregory Seikanic
Regional Director
U.S. Fish and Wildlife Service

Tom Doolittle
Deputy Assistant Regional Director
Office of Subsistence Management

¹ A summary of these changes drafted by KRITFC biologist Bill Bechtol is enclosed for your review.

² As you know the ANS for Chinook salmon in the Kuskokwim River is 67,200 to 109,800. 5 AAC 01.286 (b)(1).