

Yukon First Nation Salmon Stewardship Alliance  
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AND

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March 14, 2023

**RE: 2023 Chinook Ichthyophonus Project**

Dear Co-Chairs,

The Yukon First Nation Salmon Stewardship Alliance (YFNSSA) is composed of representatives from Yukon First Nation Governments and the Council of Yukon First Nations (CYFN). Following the December Yukon River Panel meeting, we met to discuss the 2023 Chinook Ichthyophonus (Ich) project. We are writing today to say that YFNSSA does not support the continuation of the Chinook Ich research project and we are asking you to discontinue the project unless an alternative, “hands-off” approach is taken.

Yukon First Nation Governments and citizens have actively reduced their harvest, protected spawning and rearing habitats, and invested in restoration projects to rebuild the Chinook populations. These sacrifices are made to ensure that Chinook continue to swim in our rivers for future generations. The lethal sampling of salmon for the Ich study counteracts our efforts by removing Chinook from the river with no foreseeable benefit. Our views are grounded by the following points:

1. The in-river mortality caused by Ich can be measured by proxy **without** handling any additional Chinook. This can be done by studying the Ich infection at Pilot and relating infections to the difference between the estimates at Pilot and Eagle sonars.
2. Given the poor run performance in 2022 and preceding years, we consider it extremely likely that the status of most Canadian-origin stock conservation units (CUs) would be considered critical if limit reference points were identified. Considering uncertainties at the CU level, the precautionary approach to management is to keep removals to the lowest level possible.

- a. In 2022, approximately 175 Canadian-origin Chinook were removed for the Ich study, this is larger than all the Chinook that were counted at the Whitehorse Rapids Fishway. This is equivalent to removing an entire spawning population. Current plans for 2023 are to increase the sampling effort, which means this project could be removing the equivalent of 2 spawning populations from Canadian spawning grounds. This is **not** a precautionary approach to salmon management.
3. The 2022 Canadian origin run of 12,000 Chinook was lower than the calculated and rejected aggregate  $S_{Gen}$  benchmark. This suggests that Canadian-origin Chinook have fallen below a critical threshold where their ability to return to sustainable abundance within one generation in the absence of harvest is uncertain to unlikely. Precautionary management should address this uncertainty and take action to control human-induced sources of salmon mortality.
  - a. As a result of declining body size at age, we would need approximately 19 to 23 percent more spawners today to produce the same number of eggs as compared to the 80's. This benchmark calculation was influenced by this period of much greater reproductive potential, and likely significantly decreased the resulted  $S_{GEN}$  value; which further supports precautionary management of decreasing human caused mortality.
4. There are no provisions in the Yukon River Salmon Agreement that support harvesting below the spawning escapement goal (without a rebuilding plan). Since there are no harvest shares, both the United States and Canada should be actively reducing harvest, not harvesting Chinook under the guise of research.

Going forward, YFNSSA does not support the 2023 Ich study, nor will we assist with the distribution of Chinook salmon to Yukon First Nations. We are asking you to support our recommendation to cancel the Alaska Department of Fish and Game ich sampling project at the upcoming Yukon River Panel meeting as a preseason recommendation to the United States. In addition, Yukon First Nations are full managers of their fisheries and Traditional Territories in the Yukon and have the same responsibility as Fisheries and Oceans Canada (DFO) does to salmon, in these regards. If similar projects will influence Canadian-origin salmon, Yukon First Nations should be engaged with DFO, prior to developing a research plan.

Sincerely,



Elizabeth MacDonald  
On behalf of YFNSSA

CC: Marc Ross, JTC Co-Chair  
Zachary Liller, JTC Co-Chair