

March 7, 2011 .

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U S EXECUTIVE SECRETARIAT

The Honorable Gary Locke
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

**RE: A CALL FOR DISASTER RELIEF UNDER SECTION 312 (a)
MAGNUSON-STEVENSON FISHERY CONSERVATION AND MANAGEMENT
ACT (MSA) FOR THE NORTON SOUND CHINOOK SALMON COMMERCIAL
FISHERMEN, UNALAKLEET AND SHAKTOOLIK, SUBDISTRICTS 5 & 6.**

Dear Secretary Gary Locke:

The Southern Norton Sound Fish and Game Advisory Committee (SNSAC) request the implementation of Section 312 of the MSA to declare a disaster in the Norton Sound Sub-districts 5 & 6 for Chinook salmon commercial fishing failure. Under Section 312 (a) you are authorized to assign funds "for assessing the economic and social effects of the commercial fishery failure." We believe the commercial fishing villages of Unalakleet and Shaktoolik fall within this purview since the failure or decline of Chinook salmon was due to natural or man-made causes beyond the control of fisheries managers to mitigate through conservation and management measures, including the regulations prohibiting the take of Chinook. The Shaktoolik and Unalakleet sub-districts enjoyed a vibrant targeted take of Chinook salmon until 1998. Since that time period, the commercial fishing fleets of these villages have sat on the beach waiting year after year to participate on the targeted take of Chinook salmon with each year bringing disappointment due to record low returns. The commercial take of Chinook provided much needed cash to the residents in an economically depressed region of Alaska.

The Alaska Board of Fish has designated the Chinook salmon in the Unalakleet and the Shaktoolik sub-districts, as a "stock of concern" based on the failure of the Chinook salmon stocks to recover despite management tools used such as subsistence and sport fish closures. The Chinook salmon qualified as a "stock of concern" because the stock did not reach escapement goals for two consecutive seasons despite the use of emergency orders restricting take.

On April 8, 2009, the Alaska Federation of Natives (AFN) submitted a letter to your office calling for a declaration of disaster for the Yukon River System. Like AFN, the


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SNSAC testified calling for a hard cap of 30,000 Chinook in the Bering Sea Aleutian Islands Pollock fishery based on our concern for the Chinook salmon stocks in the Norton Sound. The North Pacific Fisheries Management Council endorsed a hard cap of 60,000. With our river systems struggling to reach escapement goals of 1,200 to 2,500 Chinook, we believe this level of a hard cap is too high. 1,200 Chinook salmon isn't much when compared to the overall bycatch rate of 130,000 Chinook in 2007 in the BSAI; in fact, a bycatch rate of only 20,000 could deplete the Chinook salmon stocks for the Unalakleet and Shaktoolik River system.

The Alaska Department of Fish and Game (DF&G) data shows a startling decline in commercial harvest in the last decade. From 1990-1999, the commercial catch for Unalakleet and Shaktoolik sub-districts 5&6 was 68,179 Chinook salmon. From 2000-2009, the commercial catch was 1,301 (DF&G SPECIAL PUB 09-25). These statistics clearly illustrate the dramatic decrease in income provided by Chinook salmon harvest. What was once the primary income-producing fish for the area's commercial fishermen is now non-existent. We respectfully request the Department of Commerce conduct an analysis of the Chinook salmon failure in the Norton Sound region, the sub-districts of Shaktoolik and Unalakleet. We firmly believe that our commercial fishermen will qualify for the disaster relief as outlined under Section 312 (a) of the MSA. Granted the failure of the Chinook salmon stock in the Norton Sound is perplexing and difficult, at best, we cannot discount the impact the Pollock fishery in the Bering Sea Aleutian Islands had on the crash of salmon stocks in the Arctic-Yukon-Kuskokwim region. Other variables played a role in the failure of the Chinook salmon stocks such as climate change, predation, food shortages, contamination, and bycatch, but all the variables, bycatch is the one thing man can control.

WE URGE YOU TO CONDUCT AN ANALYSIS OF THE SITUATION IN THE NORTON SOUND AND DETERMINE WHETHER THE SMALL SCALE COMMERCIAL FISHING FLEET QUALIFIES FOR DISASTER RELIEF. BASED ON OUR OWN EVALUATIONS AND FINDINGS, WE BELIEVE THE CALL IS WARRANTED.

Sincerely,


Art C. Ivancich
SNSAC Chairman

cc: Don Chapman, DoC
Senator Lisa Murkowski
Congressman Don Young
Nelson Angapak, AFN
Karen Gillis, BSFA

Alisa Praskovich, White House
Senator Mark Begich
Doctor Lubchenko, Under Secretary NOAA
Loretta Bullard, Kawerak
SNSAC Members