

STATE CAPITOL  
P.O. Box 110001  
Juneau, AK 99811-0001  
907-465-3500  
fax: 907-465-3532



550 West Seventh Avenue, Suite 1700  
Anchorage, AK 99501  
907-269-7450  
fax 907-269-7461  
[www.Gov.Alaska.Gov](http://www.Gov.Alaska.Gov)  
[Governor@Alaska.Gov](mailto:Governor@Alaska.Gov)

Governor Sean Parnell  
STATE OF ALASKA

July 14, 2012

The Honorable Rebecca Blank  
Acting Secretary  
United States Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Re: Federal Fishery Disaster

Dear Madam Secretary,

In accordance with Section 312(a) of the Magnuson-Stevens Fishery Management and Conservation Act (MSA), I am writing to request that you declare a fishery disaster for the 2011 Chinook salmon fisheries on the Yukon and Kuskokwim Rivers, and 2012 Chinook salmon on the Yukon and Kuskokwim Rivers. The MSA authorizes the Secretary of Commerce to determine if a commercial fishery failure has occurred. I ask your soonest possible review of this matter due to the importance of these fisheries to the local, regional, state, and national economies.

Our analysis indicates that the decline in these fisheries meets the standards in the MSA for disaster determinations. The cause of these declines is undetermined and could include a variety of factors including ocean survival or other unknown factors. As I indicated in the 2009 disaster declaration request, run sizes in subsequent years will likely be impacted.

**2011 and 2012 Yukon River Chinook Fisheries**

The 2011 Chinook Yukon River fishery was almost completely shut down due to run strength, and the subsistence opportunity was significantly restricted. The five year average harvest from 2006 to 2010 was nearly 19,000 fish, resulting in an economic value of over \$3 million for region residents in some years.

The situation in 2012 is more troubling. There are no commercial harvest openings expected for Chinook on the Yukon River, and harvest restrictions are leading to reduced activity in other salmon fisheries. Subsistence opportunity has been significantly restricted.

**2011 and 2012 Kuskokwim River Chinook Fisheries**

In 2011, Chinook sales were restricted on the Kuskokwim River, and the value of the fishery was negligible. This is down from the five year previous average of over 4,200 Chinook salmon sold. For 2012, fisheries managers have been unable to open any directed Chinook salmon fisheries on the Kuskokwim River in an attempt to meet escapement goals for Chinook salmon. Again, while final

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results are not available for 2012, there may be substantial harm to other salmon fisheries on the Kuskokwim River, and subsistence harvest will most likely be reduced.

### **Additional Considerations**

There are additional fisheries which may merit a fisheries disaster declaration including, but not limited to, the Cook Inlet Chinook which are experiencing diminished returns. Fisheries managers have imposed several closures on area streams as they work to meet escapement numbers. Not only is the commercial harvest a critical economic engine, but Chinook closures on the Kenai and other rivers are causing significant economic harm to the sportfish businesses in the area. Final economic harm is not known at this time, but is expected to be significant for these businesses. The Cook Inlet salmon runs are also a critical food source to Matanuska-Susitna Valley residents. We will continue to monitor the situation of this and other fisheries, and may request additional disaster determinations once the final data is analyzed.

It is important to emphasize the critical nature of these fisheries to region residents. Residents in the Yukon and Kuskokwim regions experience some of the highest poverty rates in the country. Earnings from even small commercial fisheries are critical to enduring Alaska's winters. Even more important to these residents' survival is the ability to engage in subsistence harvests. The state of fisheries this year may severely impact their subsistence harvests.

It appears these river systems may be facing long-term systemic changes and require significant and long-term financial resources to determine the precise problem and make corrective actions. We request that along with a disaster declaration, you also do what you can to increase immediate resources to assist in potential food shortages, and direct long-term, sustainable funding to research.

Given the status of the fisheries this year, we are making this immediate request for a determination for Yukon River and Kuskokwim River Chinook stocks. I have directed the Alaska Departments of Commerce, Community and Economic Development, and Fish and Game to continue their review and provide analysis on other fisheries that may be facing disaster determinations in 2011 and 2012.

Sincerely,



Sean Parnell  
Governor

Enclosure

cc: The Honorable Lisa Murkowski, United States Senate  
The Honorable Mark Begich, United States Senate  
The Honorable Don Young, United States House of Representatives  
The Honorable Gary Stevens, Alaska State Senate  
The Honorable Lyman Hoffman, Alaska State Senate  
The Honorable Donald Olson, Alaska State Senate

The Honorable Thomas Wagoner, Alaska State Senate  
The Honorable Linda Menard, Alaska State Senate  
The Honorable Mike Chenault, Alaska State House of Representatives  
The Honorable Bob Herron, Alaska State House of Representatives  
The Honorable Mark Neuman, Alaska State House of Representatives  
The Honorable Neal Foster, Alaska State House of Representatives  
The Honorable Susan K. Bell, Commissioner, Alaska Department of Commerce,  
Community, and Economic Development  
The Honorable Cora Campbell, Commissioner, Alaska Department of Fish and Game  
Myron Naneng, Sr., President, Association of Village Council Presidents  
Julie Kitka, President, Alaska Federation of Natives  
James Balsiger, Alaska Region Administrator, National Marine Fisheries Service  
Kip Knudson, Director of State and Federal Relations, Office of the Governor



## MEMORANDUM

TO: Susan Bell, Commissioner

DATE: Saturday, July 14, 2012

FROM: Glenn Haight, Development Manager

RE: Review of fisheries disaster status for 2011  
and 2012 Yukon and Kuskokwim River  
Chinook Fisheries and 2012 Cook Inlet  
Chinook Fisheries

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The information in this memo supports a state recommendation to seek a federal disaster declaration by the US Department of Commerce for several Alaska salmon fisheries for 2011 and 2012. Please note there are additional fisheries that may qualify for a disaster declaration recommendation. Our office is working with the Alaska Department of Fish and Game and will follow up as the fishing seasons and analyses are completed.

Federal fisheries disasters may occur under the Magnuson-Stevens Act (MSA) or the Interjurisdictional Fisheries Act (IFA). Under either act, the underlying determinate of a commercial fishery failure is the *cause* and the *impact*.

### Causes

Causes allowable under MSA are natural, undetermined, or man-made beyond the control of fishery managers. Under IFA, causes may be natural or undetermined. In either case, the poor stock runs in the Yukon and Kuskokwim Rivers, and the Cook Inlet region are a function of one or more of these factors.

### Impact

The federal government may employ some discretion in reviewing and making a determination on impact. Metrics may include harvests, value, number of participants, jobs, landings, and other. In the case of these fisheries, there appears to be ample information to make a finding.

Impact will be specifically determined based on how the last 12 months of activity fair against the previous five years. The federal guidelines state that declines of 80 percent or greater will result in an automatic disaster declaration. Declines between 35 percent and 80 percent may result in a disaster declaration. Declines less than 35 percent will not result in a disaster declaration. Given the immediate nature of our 2012 fishery, this memo restricts the analysis to those fisheries that meet or exceed the 80 percent decline standard. There are many other fisheries under review that may also meet this definition or that of the 35 percent to 80 percent criteria.

In terms of evaluating impact, federal managers may consider impacts on sub units. This is important particularly in the Kuskokwim fishery, where management is split between the Kuskokwim Bay and River. For the purposes of this recommendation, the analysis shows the river fishery is under significant stress.

## Yukon Salmon Fisheries

Yukon salmon fisheries are broken into two main area, the Lower and Upper fisheries. There are several districts in each of the two areas.

### Chinook

The Yukon Chinook fishery continues to falter with poor returns. Commercial Chinook harvests have fallen significantly over the last five years. Table 1 provides the analysis on the total commercial Yukon Chinook harvests from 2006 through current 2012. The 5-year average number of fish sold commercially from 2006 – 2010 was 18,863 fish. The 109 fish sold commercially in 2011 is substantially below that mark. Even with the greatly reduced number of sales in 2011, the 2007 – 2011 average number of fish sold was 9,719 fish. With little to no commercial sale expected in 2012, it will again meet the definition of a fishery disaster.

Unfortunately, each year the river does not produce the 5 year average declines. This suggests in five years continued poor harvests will no longer technically result in a federal fisheries disaster. If a disaster declaration is requested, it appears critical it come with multi-year (8 or more years) funding for research and restoration.

Table 1  
Yukon Total Chinook Data

Category	2006	2007	2008	2009	2010	2011	Disaster Metrics for 2011 Season		Disaster Metrics for 2012 Season		
							Current Data 2012	Average 2006 - 2010	2011 Increase (Decline)	Average 2007 - 2011	2012 Increase (Decline)
Number of Fish	45,829	33,634	4,641	316	9,897	109	-	18,863	-99%	9,719	-100%
Pounds Harvested	859,405	595,352	65,438	4,203	127,671	1,488	0	275,593	-99%	158,830	-100%
Value of Fisheries	\$ 3,319,552	\$ 2,171,349	\$ 303,633	\$ 21,014	\$ 638,357	\$ 7,438	\$ -	\$ 1,076,890	-99%	\$ 628,358	-100%

Source: 2006 - 2010 data, Alaska Department of Fish & Game, Annual Management Report Yukon and Northern Areas 2010, May 2012, Appendices A4, A5, A6, A7, A9, A11, A13. 2011 data, Alaska Fish & Game AYK Database Management System. 2012 data, Alaska Fish & Game online 2012 Preliminary Alaska Commercial Salmon Catches - Blue Sheet.

### Summer Chum

As of this writing, the summer chum fishery is underway. Preseason projections, escapement data, and current harvests do not suggest the summer chum fishery will meet the requirement fishery disaster threshold.

One factor that may impact summer chum harvests and values is reductions in harvest activity because of area closures and retention prohibitions due to Chinook measures.

We will conduct further analysis on the summer chum fishery for the Upper Yukon, where there may be justification for a declaration. Harvest levels for chum on the Upper Yukon fell 72 percent in 2011 in comparison to the five year average for the fishery. See Table 2 for details.

Table 2

Upper Yukon Summer Chum Data

Data for 2012 current as of July 12

Category							Disaster Metrics for 2011 Season		Disaster Metrics for 2012 Season		
	2006	2007	2008	2009	2010	2011	Current Data 2012	Average 2006 - 2010	2011 Increase (Decline)	Average 2007 - 2011	2012 Increase (Decline)
Number of Fish	44,641	21,978	25,588	12,366	49,673	8,651	-	30,849	-72%	23,651	-100%
Pounds Harvested	272,310	127,472	186,792	66,776	263,267	45,850	0	160,411	-71%	138,032	-100%
Value of Fisheries	\$ 43,570	\$ 31,868	\$ 46,698	\$ 17,362	\$ 60,551	\$ 11,463	\$ -	\$ 35,252	-67%	\$ 33,588	-100%

Source: 2006 - 2010 data, Alaska Department of Fish & Game, Annual Management Report Yukon and Northern Areas 2010, May 2012, Appendices A4, A5, A6, A7, A9, A11, A13. 2011 data, Alaska Fish & Game AYK Database Management System. 2012 data, Alaska Fish & Game online 2012 Preliminary Alaska Commercial Salmon Catches - Blue Sheet.

**Coho**

The Coho fishery occurs in the fall on the Yukon River. Pre-season projections do not suggest a disaster declaration will be warranted. However, it is simply too early to make any findings.

**Kuskokwim Salmon Fisheries**

Kuskokwim salmon fisheries are broken into two main areas, the Kuskokwim Bay and Kuskokwim River. The main area of concern is the river fishery. Results from the 2011 Kuskokwim River Chinook fishery indicate it clearly meets the criteria for a disaster determination. While the river fishery is known to begin in June, as of this time, subsistence Chinook fisheries have been severely restricted and the commercial fishery has not yet opened. It remains too early to determine if the 80 percent threshold requirement will be met. Given the late delay in the commercial fishery, a disaster finding is likely.

**Kuskokwim River**

Forty nine Chinook salmon were sold during the 2011 Kuskokwim River commercial salmon fishery compared to the previous 5-year average of 4,243. It appears this meets the threshold of a disaster declaration. However, no directed commercial Chinook fishery has occurred on the Kuskokwim River for several decades. Table 3 demonstrates the last five years of harvest activity for Chinook salmon.

Table 3

Kuskokwim River Chinook Data

Data for 2012 current as of July 12

Category							Disaster Metrics for 2011 Season		Disaster Metrics for 2012 Season		
	2006	2007	2008	2009	2010	2011	Current Data 2012	Average 2006 - 2010	2011 Increase (Decline)	Average 2007 - 2011	2012 Increase (Decline)
Number of Fish	2,777	179	8,865	6,664	2,731	49	-	4,243	-99%	3,698	-100%
Pounds Harvested	38,600	2,524	114,359	87,298	35,776	613	0	39,881	-98%	48,114	-100%
Value of Fisheries	\$ 20,844	\$ 1,489	\$ 83,482	\$ 61,982	\$ 57,242	\$ 521	\$ -	\$ 32,223	-98%	\$ 40,943	-100%

Source: 2006 - 2010 data, Alaska Department of Fish & Game, 2010 Kuskokwim Area Management Report, December 2011, Appendices A9, A10, A11, A12, A13, C3, D3. 2011 data, Alaska Fish & Game AYK Database Management System. 2012 data, Alaska Fish & Game online 2012 Preliminary Alaska Commercial Salmon Catches - Blue Sheet.

Area managers also expressed concern that the annual subsistence Chinook harvest may significantly be impacted by area closures. While other salmon species are not of concern, Chinook directed subsistence fishing has been severely restricted to achieve escapement goals. This has had an impact on Chinook subsistence harvest and is an area of immediate concern for region residents.

**Kuskokwim Bay**

Fishing is underway in the bay. At this time, returns are below five-year averages, but do not appear to warrant declaration. We will continue to monitor the situation.

## Cook Inlet Salmon Fisheries

The 2012 Cook Inlet salmon fishery is realizing significantly lower runs of Chinook than in previous years. At this time, we do not have sufficient economic impact information for a definitive recommendation. However, it is anticipated the economic decline will be significant, warranting a fishery disaster declaration.

Table 4

Date for 2012 current as of July 12

### Upper Cook Inlet Chinook Data

Category	2006	2007	2008	2009	2010	2011	Disaster Metrics for 2011 Season		Disaster Metrics for 2012 Season		
							Current Data 2012	Average 2006 - 2011 Increase (Decline)	Average 2007 - 2011	2012 Increase (Decline)	
Number of Fish	18,029	17,625	13,333	8,750	9,901	11,248	1,680	13,528	-17%	12,171	-86%
Pounds Harvested	353,368	359,550	310,659	152,250	204,951	227,210	34,104	267,998	-15%	250,924	-86%
Value of Fisheries	\$ 617,133	\$ 629,521	\$ 544,120	\$ 266,548	\$ 349,137	\$ 634,617	\$ 110,838	\$ 506,846	25%	\$ 484,789	-77%

Source: 2006 - 2011 data, Alaska Department of Fish & Game's 2011 Upper Cook Inlet Area Commercial Fisheries Annual Management Report, July 2012, Appendices B6 and B7, 2012 Preliminary Alaska Commercial Salmon Catches - Blue Sheet, and online catch history on Alaska Department of Fish & Game's website.

### Impacts on Subsistence

Discussions with Fish & Game indicate this year's commercial harvest closures may impact subsistence harvests in the Yukon and Kuskokwim. This may have significant economic consequence to region residents. Ongoing review and analysis is needed, particularly given the reliance on subsistence foods for community, household, and personal well-being.

### Follow-up Action

As described above, there appears to be ongoing and significant declines in the Yukon and Kuskokwim Chinook salmon fisheries, and Cook Inlet salmon fisheries. Ongoing monitoring, reporting, and analysis will be conducted as each fishery is prosecuted, but the known declines and restrictions on subsistence fisheries warrant the request for a federal fishery disaster declaration at this time.