



Upper Skagit Indian Tribe
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January 20, 2017

To: Secretary of Commerce

Cc: Sam Rauch, Deputy Assistant Administrator for Regulatory Programs
Barry Thom, Regional Administrator, West Coast Region

United States Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Secretary of Commerce,

I am formally requesting that the Upper Skagit Indian Tribe be included in the economic fishery disaster, pursuant to Section 312 (a) of the Magnuson-Stevens Fishery Conservation and Management Act (2007) regarding the extremely low Puget Sound coho salmon and pink salmon returns in 2015. A declaration of an economic fishery disaster will support the Upper Skagit Indian Tribe intent to seek Congressional relief assistance for Tribal fishers who were adversely impacted by the extremely low returns of Skagit River coho and pink salmon that were also smaller than average in size. The Upper Skagit Indian Tribe urges a prompt response to expedite relief assistance for our fishers.

The 2015 Upper Skagit Indian Tribe's Coho Salmon fishery resulted in a 93% loss of income for the tribal community for the coho fishery. We estimate that 5-year average pounds landed by Upper Skagit fisheries to be 71,102 lbs and in 2015 fishers only landed 7,319 lbs. The net income for the Upper Skagit tribal Coho fishery in 2015 was approximately \$7,900 while the 2010-2014 average was \$110,500 (Appendix A). These numbers do not, however, reflect the additional costs from losses in ceremonial and subsistence harvests that provide food for our community.

In addition to declines in coho salmon, the Skagit River pink salmon returns can exceed 1 million fish, but in 2015, pink salmon returns were the worst on record (Table B.1, Appendix B). The 5 odd year average (2005, 2007, 2009, 2011, 2013) of pounds landed is 231,388 lbs compared to a 2015 pounds landed of 13,404 lbs. On average Skagit Pink salmon weight 4.05 lbs over the last 5 odd years, however in 2015; Skagit River Pink salmon weighed 3.00 lbs. It is likely that fishery gear restrictions missed what fish that did return to the Skagit. The lack of abundance in pink salmon has been also corroborated by low estimate spawner abundances and all time low recruitment from the 2015 returns (Table B.2, Appendix B). For pink salmon, small fish associated with poor ocean conditions were not caught using usual fishery practices (mesh size restrictions) compounding the impact of low returns. Generally, Skagit River Pink Salmon fisheries represent a needed boost in revenue of (\$62,000 on 5 odd year average) to purchase nets, motors and other capital investments by tribal members. The 2015 Skagit River pink fishery grossed a meager \$2,610 in total for Upper Skagit Tribal members.

Puget Sound coho and pink salmon returns in 2015 that includes the Skagit River was a result of multiple and likely interrelated factors. 2015 was an anomalous year, first the establishment of an extremely strong high pressure system referred to as the "ridiculously resilient ridge" that led to warmer than normal temperatures and drier conditions. The ridge drove higher than normal temperatures in the Pacific Ocean resulting into what was known as the "blob". The anomalous ocean conditions in the Pacific off of the Washington coast had dramatic shifts in prey items for coho salmon (NOAA unpublished data). Pink salmon are also known to have diet overlap with coho salmon during their second year, which suggests that pink salmon could be impacted by ocean conditions similar to coho (Welch and Parsons 1993, Fisheries Oceanography, 2(1) pp. 11-23). These regional factors likely led to low survival, reduced prey availability, higher metabolic stress and poor body condition in coho and pink salmon that did return to the Skagit River.

The lack of coho and pink salmon 2015 were also met with low returns of Chinook salmon and ongoing low abundance of Skagit River chum salmon and steelhead. 2015 represented the lowest catch of salmon in recent memory for Upper Skagit Indian Tribe (28% of a 10 year average catch), which has resulted in a negative impact to our 42 fishers, community's economy, culture and subsistence. Most of the declines in salmon have been attributed to habitat loss associated with human development (State of the Watershed Report 2016). 2015 marine conditions, however, likely caused unprecedented impact to salmon stocks. The non-existent Upper Skagit Indian Tribe harvest of coho salmon and pinks salmon in 2015 had further impacts to our traditional way of life and cultural and spiritual ties to the resource.

As a sovereign nation and federally recognized tribe, the Upper Skagit Indian Tribe has the authority to request and receive fisheries disaster assistance as administrated under your office and Congressional appropriation. We ask that under your authority and in cooperation with all parties impacted by the 2015 low Puget Sound coho salmon returns to issue a Fisheries Economic Declaration as authorized under Section 312(a) of the Magnuson-Stevens Fishery Conservation and Management Act (2007). We also ask that you consider pink salmon and other stocks in low abundance that limited harvest for communities across Puget Sound.

Thank you for your consideration,

Sincerely,



Doreen Maloney
Director Treaty Entitlements
Upper Skagit Indian Tribe

Appendix A. Total Landings

Table A.1. Pounds landed by Upper Skagit Indian Tribal members over the last 10 years by species. 2015 represents a 72% decline in harvests across all species. Coho salmon and pink salmon were down 90% and 94%, respectively.

Year	Chinook	Chum	Coho	Pink	Sockeye	Steelhead	Total
2005	15735	105106	69352	32792	1242	2990	227217
2006	10268	295605	16597		4704	4426	331600
2007	14004	76715	58556	14104	4477	10261	178117
2008	35263	32576	37140		9400	4772	119151
2009	49561	18932	36887	149556	1095	3126	259157
2010	17845	44216	98108		15961	3416	179546
2011	27511	9121	84089	311284	26562	2162	460729
2012	25161	22671	71762		45575	3606	168775
2013	20621	9600	64554	649204	15344	2385	761708
2014	20262	6156	36997		31135	2589	97139
2015	5701	10492	7379	13404	41469	541	78986

Appendix B. Other Skagit River pink salmon abundance data

Table B.1. Skagit River pink salmon escapement estimates for the last five odd years. 2015 represented a low year for Skagit River pink salmon escapement.

Year	Escapement
2005	600,000
2007	300,000
2009	1,160,000
2011	908,497
2013	900,000
2015	300,000

Table B.1. Skagit River pink salmon marine fry counts results conducted by Washington State Fish and Wildlife. Marine fry counts are visual assessments of juvenile pink salmon in near shore habitats in Puget Sound represented by the total number of fish observed over number of survey days. This survey represents a coarse yet only assessment of recruits from previous years' spawning. Recruits from the 2015 spawning were down 87% from the previous 5 odd year average and the lowest on record.

Year	Fish Days
2005	925,707
2007	3,706,144
2009	3,111,820
2011	2,952,620
2013	1,784,030
2015	313,843