



Tanana Chiefs Conference, 122 First Avenue, Fairbanks, AK 99701
Association of Village Council Presidents, 101 Main Street, Bethel, AK 99559

The Honorable Penny Pritzker
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

December 2, 2014

Dear Madame Secretary:

We received the letter from Eileen Sobeck, Assistant Administrator for Fisheries, with a date stamp of October 10, 2014. We were disappointed that NOAA denied our request for emergency regulations on grounds that “the purported emergency cannot ‘be addressed through emergency regulations.’” We maintain that the “purported emergency” is substantiated throughout the petition and will continue to be reenacted each day that the Alaska Native villages along the Yukon and Kuskokwim Rivers go without the ability to share and consume Chinook salmon throughout this winter.

In our petition, we emphasized that given the crash of the Western Alaska Chinook population, every source of mortality over which managers have control must be adjusted to promote the restoration of the stocks. NOAA’s denial of our petition in part on the grounds that Chinook bycatch in the pollock industry “does not appear to be a predominant factor in determining the size of Chinook salmon runs” misses this point.

We are aware that the North Pacific Fishery Management Council will be considering Chinook bycatch management measures at its December 2014 meeting. We agree that it is important for the Council to continue to develop these measures; however, action to create some level of equity in the allocation of Chinook salmon must be taken prior to the 2015 fishing season. The status quo of the pollock fishery incidentally catching even 15,000 Chinook salmon

while the Alaska Native villages on the Yukon and Kuskokwim Rivers go entirely without is unacceptable and cannot remain the management choice of the NPFMC and the Department of Commerce.

We respectfully request an opportunity for tribal consultation with Dr. Balsiger regarding the NPFMC's bycatch management measures prior to the Council's meeting on this subject. For scheduling, please contact Elizabeth Hensley at elizabethh@lbblawyers.com or (907) 868-9229.

Sincerely,



Victor Joseph, President
Tanana Chiefs Conference



Myron Naneng, Sr., President
Association of Village Council Presidents

Cc:

The Honorable Julie Kitka

Sam Cotton, Acting Commissioner, Alaska Department of Fish and Game

Jim Balsiger, Regional Administrator, National Oceanic and Atmospheric Administration

North Pacific Fishery Management Council