

Proposed Community Outreach Plan for Arctic FMP

Background on the need for a community outreach plan

The Council's workplan priority to increase Alaska Native and community consultation is currently being developed for review by the Council. As stated in the workplan, it is intended to be implemented through two specific goals: 1) develop a protocol or strategy for improving the Alaska Native and community consultation process; and 2) develop a method for systematic documentation of Alaska Native and community participation in the development of management actions.

In addition to the stated priority in the workplan, the need for an approach to improve the consultation process has been highlighted in the development of the Arctic Fishery Management Plan. Prior to its June 2007 meeting, the Council received letters from the Native Village of Kotzebue, and the Maniilaq Association, which represents twelve communities located in Northwest Alaska.¹ The correspondence from these entities noted concern with the Council's lack of communication with communities living adjacent to the Arctic EEZ about the potential development of an Arctic FMP. Their comments on potential alternatives for an Arctic FMP were combined with a request for the Council to pursue "full consultation and input from affected communities and residents"², as well as a request to be considered for a role on an Arctic Plan Team to further develop an Arctic FMP.³

Native & community outreach plan

The following are suggestions for an outreach plan to be implemented during the development of the Arctic FMP. Council staff would oversee this plan and maintain ongoing and proactive relations with Native and rural communities.

- Identify coastal communities within North Slope Borough, Northwest Arctic Borough, & Nome Census Area that are adjacent to the action area (Chukchi Sea and Beaufort Sea)
- Identify regional and village corporations, community governments, or other community or Native entities in each of those communities (e.g., regional nonprofits, etc.). **See attached.**
- Identify contact information for each of those entities.
- Contact (by letter) and solicit input from each entity identified as being potentially affected by the proposed action, prior to the release of the preliminary analysis. Send letter in August 2007. Include in letter:
 - New brochure on Council process: *Navigating the North Pacific Council Process*
 - June 2007 Council motion on Arctic FMP
 - Schedules for action
 - Summary of action (1 pg flyer) that can be easily distributed in community
- Convene meetings as necessary and appropriate during the development of the analysis. This step may only be necessary if it is determined that the action has significant, unique, or substantial direct effects on a particular community. This could also be prompted by strong desires from

¹Member villages of the Maniilaq Association include Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, Shungnak, and Pt. Hope.

²Letter from H. Bolen, Maniilaq Association to S. Madsen, NPFMC. May 25, 2007.

³Letter from A. Whiting, Native Village of Kotzebue to S. Madsen, NPFMC. May 25, 2007.

individual communities that they have an opportunity for face to face discussion of the proposed action outside of the Council meetings or FMP Team meetings.

- If an Arctic FMP Team is formed, consider representation from an Alaska Native and/or community entity representing each of the three boroughs in the action area.
- Contact (by email, fax, or letter) and solicit input from each entity identified as being potentially affected by the proposed action, prior to the Council's scheduled final action (June 2008?).
- Provide travel funds for Alaska Native entities and/or rural community participation in the Council meetings addressing this issue (initial review/final action) as feasible. Further efforts are needed to identify the particular entities to receive funding.
- After a decision by the Council, follow-up with the potentially affected entities (by email, fax, or letter) as to the results of the Council's action. Convey that the Council's action is a recommendation to the Secretary of Commerce, and further input can be provided to the Secretary.
- Document this consultation process in a short summary in the Secretarial review draft of the analysis supporting the action. Include a summary of the process undertaken to solicit input from affected entities, including solicitations for input, public meetings, the distribution of documents, and/or travel funding provided to attend Council meetings. Include a brief summary of the participants and issues discussed at meetings.

Alaska Native and community contacts for Arctic FMP outreach

	Borough	Regional Native Corp.	Regional Native Non-profit (health & social services)	Regional Development Org.
Northwest Arctic Borough Communities	Northwest Arctic Borough P.O. Box 1110 Kotzebue, AK 99752	NANA Regional Corporation P.O. Box 49 Kotzebue, AK 99752	Maniilaq Association P.O. Box 256 Kotzebue, AK 99752	NW Arctic Economic Dev. Comm. P.O. Box 1110
	Village Council (IRA)	Village Native Corp.	City Government	
Ambler	Native Village of Ambler P.O. Box 47	NANA Regional Corporation P.O. Box 49	City of Ambler P.O. Box 9	
Buckland	Native Village of Buckland P.O. Box 67	NANA Regional Corporation P.O. Box 49	City of Buckland P.O. Box 49	
Deering	Native Village of Deering (IRA) P.O. Box 36089	NANA Regional Corporation P.O. Box 49	City of Deering P.O. Box 36049	
Kiana	Kiana Traditional Council P.O. Box 69	NANA Regional Corporation P.O. Box 49	City of Kiana P.O. Box 150	
Kivalina	Native Village of Kivalina (IRA) P.O. Box 50051	NANA Regional Corporation P.O. Box 49	City of Kivalina P.O. Box 50079	
Kobuk	Native Village of Kobuk Traditional Council	NANA Regional Corporation P.O. Box 49	City of Kobuk P.O. Box 5120	
Kotzebue	Kotzebue IRA Council P.O. Box 296	Kikiktagruk Inupiat Corporation P.O. Box 1050, 373A Second	City of Kotzebue P.O. Box 46	
Noatak	Native Village of Noatak (IRA) P.O. Box 89	NANA Regional Corporation P.O. Box 49	N/A	
Noorvik	Noorvik Native Community P.O. Box 209	NANA Regional Corporation P.O. Box 49	City of Noorvik P.O. Box 146	
Selawik	Selawik IRA Council P.O. Box 59	NANA Regional Corporation P.O. Box 49	City of Selawik P.O. Box 99	
Shungnak	Native Village of Shungnak P.O. Box 64	NANA Regional Corporation P.O. Box 49	City of Shungnak P.O. Box 59	
	Borough	Regional Native Corp.	Regional Native Non-profit (health & social services)	Regional Development Org.
Nome Census Area Communities	N/A	Bering Straits Native Corp. P.O. Box 1008	Kawerak, Incorporated P.O. Box 948	Bering Strait Dev. Council P.O. Box 948
	Village Council	Village Native Corp.	City Government	CDQ Group
Diomede	Native Village of Diomede (IRA) P.O. Box 7079	Diomede Native Corporation P.O. Box 7040	City of Diomede P.O. Box 7039	Norton Sound Econ. Dev. Corp.
Shishmaref	Native Village of Shishmaref P.O. Box 72110	Shishmaref Native Corporation General Delivery	City of Shishmaref P.O. Box 83	N/A
Wales	Native Village of Wales P.O. Box 549	Wales Native Corporation P.O. Box 529	City of Wales P.O. Box 489	Norton Sound Econ. Dev. Corp.

Alaska Native and community contacts for Arctic FMP outreach

	Borough	Regional Native Corp.	Regional Native Non-profit (health & social services)	Regional Development Org.
North Slope Borough Communities	North Slope Borough P.O. Box 69	Arctic Slope Regional Corporation	Arctic Slope Native Assoc., Ltd. P.O. Box 1232	N/A
	Village Council (IRA)	Village Native Corp.	City Government	
Alpine	N/A	N/A	N/A	<i>Alpine is an unpopulated, seasonal use community. It</i>
Anaktuvuk Pass	Village of Anaktuvuk Pass P.O. Box 21065	Nunamiut Corporation P.O. Box 21009	City of Anaktuvuk Pass P.O. Box 21030	
Atqasuk	Atqasuk Village P.O. Box 91108	Atqasuk Corporation Tikiglyk & Akpik St	City of Atqasuk P.O. Box 91119	
Barrow	Inupiat Community of the Arctic Slope (IRA)	Ukpeagvik Inupiat Corporation P.O. Box 890	City of Barrow P.O. Box 629	
Kaktovik	Native Village of Kaktovik P.O. Box 130	Kaktovik Inupiat Corporation 010 A Street	City of Kaktovik P.O. Box 27	
Nuiqsut	Native Village of Nuiqsut P.O. Box 169	Kuukpik Corporation P.O. Box 89187	City of Nuiqsut P.O. Box 148	
Point Hope	Native Village of Point Hope P.O. Box 109	Tigara Corporation 2121 Abbott Road	City of Point Hope P.O. Box 169	
Point Lay	Point Lay Tribal Council (IRA) P.O. Box 59031	Cully Corporation 405 East Fireweed Suite 203	N/A	
Prudhoe Bay	N/A	N/A	N/A	<i>Unincorporated. Oil drilling site.</i>
Wainwright	Village of Wainwright P.O. Box 143	Olgoonik Corporation P.O. Box 29	City of Wainwright P.O. Box 9	
Other community contacts	Inuit Circumpolar Conference 429 L Street Anchorage, Alaska 99501 Eskimo Walrus Commission P.O. Box 948 Nome, AK 99762	Alaska Native Science Commission Patricia Cochran, Executive	Barrow Arctic Science Consortium Glenn W. Sheehan, Ph.D.,	Harry Brower, Jr., Chair Alaska Eskimo Whaling Commission

North Pacific Fishery Management Council

Stephanie Madsen, Chair
Chris Oliver, Executive Director



605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Telephone (907) 271-2809

Fax (907) 271-2817

Visit our website: <http://www.fakr.noaa.gov/npfmc>

[Insert date]

Dear _____

I am writing today to discuss an issue that is of importance to the North Pacific Fishery Management Council (Council), Alaska Native tribes, and local Arctic communities. The issue concerns the proposed development of a Fishery Management Plan for the Federal waters of the Arctic Ocean. We wish to inform you of the Council's current position on this issue, the schedule for action, and opportunities for you to provide comments and feedback as this effort progresses.

The Council is responsible for management of commercial fisheries in Federal marine waters offshore of Alaska. The guiding policies the Council uses in its management programs are stated in Fishery Management Plans. The Council does not currently have a Fishery Management Plan (FMP) for the Arctic Ocean, as few offshore commercial fisheries have been developed to date. However, the Council has expressed concern over the lack of a comprehensive, ecosystem-based management policy for Arctic marine waters, and thus passed a motion at its June 2007 meeting that calls for development of an FMP that would provide a comprehensive management policy for commercial harvest of fish and shellfish in the offshore waters of the Arctic. The Council's intent in developing an Arctic FMP is to prohibit commercial fishing in Arctic Federal waters until there are sufficient data and/or interest in opening a fishery. If or when that time comes, the Council would discuss options, analyze alternatives, and involve local communities in any decision making processes.

Offshore "Federal" waters are called the Exclusive Economic Zone (EEZ) and encompass marine waters between 3 and 200 nautical miles off Alaska. The Arctic FMP would only cover Arctic EEZ waters of the Chukchi Sea (from Bering Strait north and west to the U.S./Russia Convention Line) and the Beaufort Sea (eastward to the Canadian border).

The Council's Arctic FMP will NOT affect management of marine mammals such as bowhead whales, seals, or polar bears. It also will NOT regulate subsistence or personal use harvests of any fish, shellfish, or marine mammal. It only creates a policy that directly affects commercial fishing.

As with most any action the Council proposes, an analysis must be developed to evaluate the environmental and socio-economic effects of the action being proposed. When the Council takes 'final action' on an issue, it represents a recommendation to the Secretary of Commerce. The Secretary of Commerce must approve the Council's recommendation in order for it to become part of a Fishery Management Plan and/or Federal regulation. In this case, the action being proposed is the development and approval of an Arctic FMP.

The proposed timeline for completing the Arctic FMP is:

- December 3 – 11, 2007, Council meeting in Anchorage – Preliminary review of FMP analysis and report on community outreach – opportunity for public comment

- February 4 – 12, 2008, Council meeting in Seattle – Initial review of FMP analysis and draft FMP language – opportunity for public comment
- February to June 2008 – ongoing public review of FMP analysis and draft FMP language
- June 2 – 10, 2008, Council meeting in Kodiak – final review of FMP analysis and Council approval of FMP – opportunity for public comment
- After the June 2008 meeting, the Council would send its recommended FMP to the Secretary of Commerce for review and approval. Prior to approval by the Secretary, a public comment period would be noticed in the Federal Register.
- 2009 – anticipated date when the Arctic FMP would be effective, if approved by the Secretary of Commerce

Enclosed with this letter is a one-page flyer that summarizes the Council's proposed plan to develop an Arctic FMP. You may wish to make copies to post in your community or add it to your regular newsletter, if appropriate. Also enclosed is a booklet entitled *Navigating the North Pacific Council Process*, which provides more information on the Council's overall role in fishery management and how this process works. Also enclosed is the Council motion from June 2007 that outlines its intent to develop an Arctic FMP.

Public comment is an important part of all Council actions, and in particular the Council is interested in receiving advice, comments, or suggestions from local communities and organizations who may be interested in the development of a draft Arctic FMP. The preliminary analysis of an Arctic FMP is expected to be completed prior to the December 2007 Council meeting, which is the next meeting at which this topic will be discussed. At such time, the draft analysis will be available on the Council website at: <http://www.fakr.noaa.gov/npfmc/>. Please contact us if you need a hardcopy of the document sent to you.

Individuals and organizations may provide written comment (by letter or fax) to the Council at any time, and it is most useful when submitted prior to a Council meeting at which the topic is scheduled for discussion or action. In addition, you can attend a Council meeting and provide oral testimony prior to action being taken on each scheduled topic. The Council agendas and schedules are posted on the website mentioned above, prior to each meeting.

Please be assured that the Council will continue to seek input from the Alaska Native and rural communities adjacent to the Arctic Ocean in the development of the Arctic FMP and during any future related action. If you have questions, please contact [staff name] at (907) 271-2809 or [insert email here].

Sincerely,

Chris Oliver
Executive Director
North Pacific Fishery Management Council

Cc: List all the places (Native groups and villages) we're sending this to so the recipient can know who else got this? There are about 65.

NOTICE



The North Pacific Fishery Management Council is Developing a Fishery Management Plan for the Arctic Ocean

The North Pacific Fishery Management Council is developing a fishery management plan (FMP) that recognizes the unique resources of Arctic waters and the potential for continued climate warming trends. The Council does not currently have a fishery management plan for the Arctic Ocean; this proposed plan would cover Federal marine waters (3 - 200 nm off Alaska) of the Chukchi and Beaufort Seas. The plan will guide the Council with respect to ecosystem-based management decisions affecting Arctic waters in the future. To date, very little commercial fishing has occurred in this region. The Council intends to be precautionary and prohibit commercial fisheries in Arctic waters under this plan until adequate knowledge is acquired upon which to make sound decisions. The proposed analysis includes an option to allow a small commercial red king crab fishery in the southern Chukchi Sea, as that fishery has occurred in the recent past. Otherwise, no commercial fishing would be allowed under the authority of the new Arctic FMP.

The Arctic FMP will:

- create a policy that directly affects commercial fishing in Federal waters

The Arctic FMP will NOT:

- affect management of marine mammals such as whales, seals, or polar bears
- regulate subsistence or personal use harvests of any fish, shellfish, or marine mammal

OPPORTUNITIES FOR PUBLIC INPUT

The Council is interested in hearing from local residents and communities, as well as agencies, organizations and the general public, during the development of the analysis and prior to decision-making. Interested stakeholders are encouraged to contact the Council with their concerns and suggestions as the Council proceeds with this effort.

Proposed Timeline:

- December 3 - 11, 2007, Council meeting in Anchorage - Preliminary review of FMP analysis
- February 4 - 12, 2008, Council meeting in Seattle - Initial review of FMP analysis and draft FMP
- February to June 2008 - ongoing public review of FMP analysis and draft FMP language
- June 2 - 10, 2008, Council meeting in Kodiak - final review of FMP analysis and Council approval of FMP
- After the June 2008 meeting, the Council would send its recommended FMP to the Secretary of Commerce for review and approval. Prior to approval by the Secretary, a public comment period would be noticed in the Federal Register.
- 2009 - anticipated date when the Arctic FMP would be effective

As they are completed, working drafts of the analysis and FMP will be available at www.fakr.noaa.gov/npfmc.

COMMENT LETTERS FROM 6/07 COUNCIL MEETING

March 28, 2007

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 W. Fourth Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. Doug Mecum, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Agenda Item D-3, Bering Sea Habitat Conservation

Dear Madame Chair and Mr. Mecum:

The Eskimo Walrus Commission (EWC) at Kawerak, Inc. in Nome was formed in 1978. EWC is a recognized statewide entity working on resource co-management issues, specifically the Pacific walrus, on behalf of 19 Alaskan Yup'ik, St. Lawrence Island Yupik, and Inupiaq communities who rely on it as an essential cultural, natural, and subsistence resource. EWC works cooperatively with the U.S. Fish and Wildlife Service (FWS) to encourage subsistence hunters' participation in conserving and managing walrus in the coastal communities.

EWC is providing this letter to express concerns regarding potential detrimental long-term impacts of bottom trawling in waters critical to Pacific walrus and coastal subsistence communities. We therefore provide the following comments with respect to the draft EA for Bering Sea Habitat Conservation:

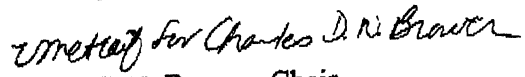
- a. EWC only supports Alternative 2 as a minimum measure for precautionary management of Bering Sea habitat. The other proposed alternatives may result in significant impacts to walrus and subsistence hunting communities. We encourage the North Pacific Fishery Management Council to constrain high impact fishing techniques such as bottom trawling on the Bering and Chukchi Sea shelf areas until more is known about the impacts to critical ecological and subsistence resources. We further encourage the Council to close important walrus habitat and subsistence hunting areas to bottom trawling that are currently within the trawl footprint and we look forward to helping you identify those areas.
- b. EWC endorses the comments of our co-management partner the U.S. Fish and Wildlife Service, with respect to their concerns about disturbance and impacts to the Pacific walrus population.
- c. EWC believes that there has been inadequate official consultation with organizations such as ours in the production of this EA.

Although EWC's position is to not support bottom trawling on the Bering and Chukchi Sea shelf areas, we are also concerned with the preparation and content of the draft EA. We feel that the preparation did not involve significant consultation with communities that stand to be impacted from activities related to this EA, and the content of the EA is neither sufficient, nor precautionary in its approach when considering bottom trawling activities. These activities could

COMMENT LETTERS FROM 6/07 COUNCIL MEETING

lead to profound impacts to subsistence communities both in and outside of the trawl area, as well as the resources on which they rely for cultural and economic sustenance.

Sincerely,



Charles D.N. Brower, Chair
Eskimo Walrus Commission

cc: Vera Metcalf, Director, Eskimo Walrus Commission
Loretta Bullard, President, Kawerak, Inc.
Rosa Meehan, Supervisory, USFWS

Native Village of Kotzebue

COMMENT LETTERS FROM 6/07 COUNCIL MEETING

Kotzebue IRA

BW

May 24, 2007

RECEIVED
MAY 25 2007

N.P.F.M.C.

North Pacific Fishery Management Council
C/O: Stephanie Madsen, Chair
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Knowledge of Language
Knowledge of Family Tree
RE: Fishery Management Options for the Alaskan EEZ in the Chukchi and Beaufort Seas of the Arctic Ocean

Sharing
Humility
Respect for Others
Love for Children
Cooperation
Hard Work
The Native Village of Kotzebue is very interested in the discussion the Council is having over fisheries management plans in the Chukchi Sea and has reviewed the paper prepared by Council staff Bill Wilson. It should be noted, the Tribe is concerned over the NPFMC's lack of communication with communities living along the Chukchi Sea about the discussion taking place on the Arctic EEZ. This effort was known about only through chance and not from a directed effort. In the future, the Tribe requests that NOAA and the Council inform the Tribes living along the Chukchi coast in a timely manner about processes/actions affecting them. Even at this early stage of Council deliberation these communities need to be represented.

Respect for Elders
Respect for Nature
Avoid Conflict
Family Roles
Humor
Spirituality
Domestic Skills
Hunter Success
In regards to the discussion paper, the Tribe was encouraged by the cautionary and thoughtful tone overall and the emphasis on ecological planning. The benefits to local Chukchi seacoast communities of expanding commercial fishing activity into the Arctic EEZ are not readily apparent; however the risks are somewhat knowable. As the Council recognizes there has recently been outright loss of critical marine mammal habitat from decreasing ice, in addition to ecological changes occurring in regards to ice algae and phytoplankton biomass and timing. Additionally, it is reasonable to postulate that the commercially unmolested fish resources in the Chukchi provide the necessary abundance for marine mammals to build fat reserves to make it through the winter in the arguably ecologically compromised Bering Sea. Exploiting important marine mammal forage fish resources (which notably includes all Potential Target Species referenced in the paper) in both their summer and winter grounds, may lead to rapid degradation of their overall health, abundance, and resiliency, especially coupled with all the other threats that are continuing, or expected to arise in the near future.

Responsibility to Tribe
Generally speaking the Tribe agrees with the Council adopting a policy of not developing fisheries in the Chukchi until it obtains the stock and ecological knowledge to support such an action. From the human point of view, it appears small communities living along the Chukchi have the least to gain and the most to lose from any major offshore fisheries created, thus their voice and concerns should be weighted heavily in the decision making process.

The Tribe has been actively engaged in marine mammal and ecosystem research in Kotzebue Sound and the Chukchi Sea over the last decade and very much supports the idea of developing an Arctic Fishery Ecosystem Plan (FEP) through an Arctic Plan Team.

The Tribe would like to be considered for a role on such an Arctic Plan Team. The Tribe can bring ecological, economic, social and cultural perspectives to the table and already has the necessary personnel and office to dedicate time to such an effort. Since the Tribe depends on the Chukchi Sea for its members cultural, spiritual and nutritional needs it will rely on federal obligations to Tribes and trust resources as this process moves forward. Many of the Tribes concerns and priorities could be addressed in an Arctic FEP allowing for better and briefer NEPA documents and processes. Given the complexity of the options and the various ramifications from any action, it would seem wise to have such a planning team and an Arctic FEP to guide further action and definition of an Arctic Fisheries Management Plan, instead of as a simultaneous action. It appears at this point, time is still on the side of wise thoughtful stewardship action and an inclusive deliberative process would allow these issues to be fleshed out with maximum ecological and social considerations. To discuss the Tribes interest and potential participation as the Council moves forward on this issue please contact me at (907) 442-5303.

Thank you for your efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Whiting". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alex Whiting
Environmental Specialist

NORTHWEST ARCTIC BOROUGH

P.O. BOX 1110

KOTZEBUE, ALASKA 99752

(907) 442-2500 / FAX (907) 442-2930

June 6, 2007

Mr. Bill Wilson
Protected Resource Coordinator
North Pacific Fisheries Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

RE: Arctic Ocean Management

Dear Bill,

On Behalf of the Northwest Arctic Borough (NAB), I welcome the opportunity to begin discussions with yourself and the North Pacific Fisheries Management Council (NPFMC) regarding the Fisheries Management Options for the Alaska EEZ on the Chukchi Sea of the Arctic Ocean.

The coastal communities along the Chukchi Sea are, much like the Bering Sea coastal communities South of us, are highly dependent upon and protective of the ocean resources. First, we know that all the marine mammals we use to feed our families depend on the fish and sea floor creatures to survive. Without these resources, there would be no whales, seals, sea birds, and walrus. Second, it is common knowledge that global warming is having a distinct affect on the feed fish and sea floor creatures as warmer waters are forced northward. Third, as the waters become warmer, the crab will venture northward thus, bringing along with them the commercial crabbing fleet. Fourth, if anyone should benefit from a commercial crab fishery within the confines of the Chukchi Sea, it should be the coastal villages. The Chukchi, unlike the Bearing Sea, is simply too small in area to support a huge fleet of commercial crabbers. They would surely decimate the crab resources in a short time. Lastly, because of the demand for domestic oil, the Federal Government is relaxing their stance on oil exploration environmental concern and allowing off shore oil exploration opportunities. Couple this with record profits enjoyed by the oil companies, efforts to tap into the Chukchi Sea potential is inevitable. Shell is already doing test wells.

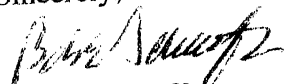
As we begin this process, please keep in mind that the Chukchi Sea coastal villages North of the Bearing Strait, that is Shishmaref to Point Hope and those communities within 50 nautical miles of the State 3 mile limit, are not eligible to participate in the Western Alaska Bearing Sea Community Development Quota program (CDQ). Political reasons were to blame. The Borough, Maniilaq Association, and NANA Regional Corporation

have made numerous attempts to petition the NPFMC to establish our own CDQ program for the Chukchi Sea area but our efforts have been unsuccessful.

In summary, based on the above mentioned reasons, the time to establish our own CDQ is critical. We want to participate in managing the resources that are vital to the protection and survival of the sea mammals that have allowed us to survive in the Arctic. Including our residents in any planning discussions relating to fishery management early is beneficial for developing a lasting management regime. I will look forward in working with you and your cohorts toward this end.

Please feel welcome to contact my office to begin discussions on developing management options for our Chukchi Sea fishery resources. Thank you.

Sincerely,



Bobby Schaeffer,
Public Services Director

**Alaska Marine Conservation Council
Center for Biological Diversity
Greenpeace
Oceana
Pacific Environment
World Wildlife Fund**

June 8, 2007

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: Agenda Item: D-5 Arctic Fisheries Management

Dear Madame Chair:

The below signed conservation organizations in Alaska urge the Council to establish a new and proactive Arctic Fishery Management Plan (FMP) that bans commercial fishing in all federal waters north of the Bering Strait for forage species and closes all Federal waters north of the Bering Strait to new commercial fishing for all other species unless and until there is sufficient information on which to base a comprehensive fisheries ecosystem plan which demonstrates that such activities could be conducted without harm to the Chukchi and Beaufort marine ecosystems and the subsistence way of life of Arctic peoples.

In the face of global climate change and a growing world population, we must protect the resilience of marine ecosystems. Rapid reductions in the sea ice cover of the Chukchi and Beaufort seas directly impacts and threatens marine life, and avoiding the addition of new stresses – helping maintain the resilience of those ecosystems – may be especially important in the Arctic.¹ The harsh environment, seasonally pulsed productivity, slower growth in cold temperatures, and relatively simple food webs are likely to make Arctic marine ecosystems more sensitive to disturbance. Furthermore, relatively little is known about the abundance, distribution and role of fish and other marine species in the Chukchi and Beaufort ecosystems.

Given the lack of knowledge and potential sensitivity of marine life in the Chukchi and Beaufort seas, it is wise and prudent to proactively protect those regions by closing them to new

¹ Chapin III, F.S., M. Hoel, S.R. Carpenter, J. Lubchenco, B. Walker, T.V. Callaghan, C. Folke, S.A. Levin, K-G Maler, C. Nilsson, S. Barrett, F. Berkes, A-S Crepin, K. Danell, T. Rosswall, D. Starrett, A. Xepapadeas, and S.A. Zimov. 2006. Building resilience and adaptation to manage arctic change. Royal Swedish Academy of Sciences 2006. *Ambio* 35(4):198-202.


Ms. Stephanie Madsen
D-5 Arctic Management
June 8, 2007
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commercial fishing unless and until it can be shown that commercial fishing can be done without harming the marine ecosystems and the subsistence way of life. By establishing a moratorium on the expansion of new Arctic fisheries now with a policy on how any fisheries could be opened in the future, the Council can help avoid future conflict.


We believe such an Arctic FMP would not need to be an extensive undertaking as the Council is taking a precautionary approach to protect the health of the marine ecosystems given the paucity of knowledge. Furthermore, we also believe that an Environmental Assessment would be the appropriate NEPA documentation, again given the precautionary approach of the Council as well as the lack of economic impact and the non-controversial nature of the proposed action. While the more rigorous process of an EIS would of course be required were the Council opening new or expanding existing fisheries, because the Council is considering forward-thinking, proactive protections in this case, we believe that an EA is sufficient.

We urge the Council to seize the opportunity to proactively and responsibly protect the Arctic by preventing additional pressures from further weakening the resilience of the ecosystems in this already-stressed region.

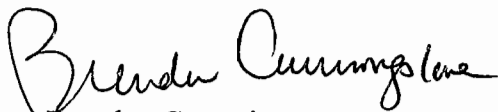
Signed,



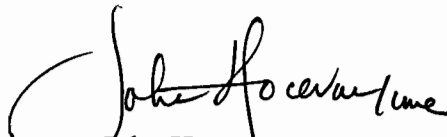
Jim Ayers
Vice President
Oceana




Dorothy Childers
Program Director
Alaska Marine Conservation Council




Brendan Cummings
Oceans Program Director
Center for Biological Diversity



John Hocevar
Senior Oceans Specialist
Greenpeace



Whit Sheard
Alaska Program Director
Pacific Environment



Alfred Lee "Bubba" Cook, Jr.
Senior Fisheries Officer Kamchatka/Bering Sea Ecoregion
World Wildlife Fund