



# UNITED FISHERMEN OF ALASKA

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March 8, 2018

The Honorable Ryan Zinke  
Secretary of the Interior  
1849 C Street, NW  
Washington, DC 20240  
Via Regulations.gov: Docket ID BOEM-2017-0074

Dear Secretary Zinke:

Thank you for the opportunity to submit comments on the Department of the Interior's 2019-2024 National Outer Continental Shelf Oil and Gas Draft Proposed Program (DPP).

United Fishermen of Alaska is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

We echo requests made by the Alaska congressional delegation, Governor Walker, North Pacific Fishery Management Council, and coastal tribes that proposed oil and gas lease sales in the Hope Basin, Norton Basin, St. Matthew-Hall, Navarin Basin, Aleutian Basin, Bowers Basin, Aleutian Arc, St. George Basin, Shumagin, Kodiak, and Gulf of Alaska Planning Areas be removed from future consideration for leasing.

Alaska's oceans are of vital importance to commercial, recreational, and subsistence activities of Alaskans. Our fisheries provide tens of thousands of jobs, billions of dollars in income, and are a key source of food for our nation and the world. The Bering Sea alone produces more than half of the nation's seafood. Alaska's commercial and recreational fisheries have a well-earned reputation for being sustainably managed, and our members depend on that reputation and healthy oceans.

Oil and gas activities in high value fish habitat create the risk of water, air, and noise pollution that threaten the fisheries on which our members depend. In addition, oil and gas leasing in Alaska's most productive fishing waters threatens the reputation for healthy fisheries and clean waters on which our fisheries marketing relies. These risks outweigh any possibility for economic gain from leasing in these areas. The Planning Areas we would like to see removed are unlikely to contain significant oil and gas resources and are far from existing infrastructure. They have not been leased or explored for decades—if ever—and likely remain unattractive targets for the oil and gas industry.

In addition, as Governor Walker noted, there are important subsistence and ecological areas in the Chukchi and Beaufort seas that warrant continued attention and conservation. If sales are scheduled anywhere in Alaska, we encourage you to consider carefully the steps needed to maintain the health and functioning of our fisheries.

Thank you for considering these comments and for taking action to ensure that Alaska's ocean resources, economy, and communities remain healthy and vibrant.

Sincerely,



Jerry McCune  
President



Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Tendermen's Association • Alaska Longline Fishermen's Association • Alaska Scallop Association  
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association  
Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association  
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association  
Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance  
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association  
United Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association