



UNITED FISHERMEN OF ALASKA

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May 6, 2013

Bruce Phelps, Section Chief
Alaska Department of Natural Resources
550 West 7th Ave. Suite 1050
Anchorage, Alaska 99501-3579
Email: dnr.bbapamend@alaska.gov

RE: Comments on the Public Review Draft (PRD) of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan

Dear Mr. Phelps,

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. The single largest salmon fishery in Alaska is the Bristol Bay sockeye salmon fishery, comprised of set and drift gillnet gear types. Altogether, these Bristol Bay salmon fisheries supported 1,488 active Alaska resident and 1,340 non-resident permit holders in 2012, generated ex-vessel value of \$121 million. Each of these represents an independent, mostly family-owned small business, that also employ crew members and support the economies of Alaska and U.S. communities. The importance of the Bristol Bay salmon fishery to future generations should not be compromised by relatively short term benefits of non-renewable extraction activities.

UFA offers the following comments on the Public Review Draft (PRD) of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan.

The plan describes Alaska regulation 11 AAC 55.230 which classifies **Wildlife Habitat Land** as “*land which is primarily valuable for:*

- 1. fish and wildlife resource production, whether existing or through habitat manipulation, to supply sufficient numbers or diversity of species to support commercial, recreational, or traditional uses on an optimum sustained yield basis; or*
- 2. a unique or rare assemblage of a single or multiple species of regional, state, or national significance.”*

We believe that there is very little land in the Bristol Bay area that would not fit in both these definitions, based on the importance of all waters in the Bristol Bay area to the world’s largest sockeye salmon runs that originate in the area’s waters.

UFA recommends that the entire reach of all anadromous streams in Bristol Bay should be protected through classification as wildlife habitat land. Navigability should not be a factor in whether or not an anadromous stream is classified as wildlife habitat, as it is irrelevant to the ability of fish to use these waters. Also, the reliance on the anadromous waters catalog is also not completely reliable or accurate in assessing whether waters are important to salmon

populations. It is well known that most biological surveys of fish bearing waters occur in the summer months, and would be lacking in capability to assess the utilization of upstream remote waters during other times of year.

A current Fish and Game website notes: “Although the database contains about 16,000 bodies of water across Alaska, it is believed that this number represents less than 50 percent of the streams, rivers, and lakes actually used by anadromous species.” (*Where The Fish Are - The Fish Distribution Database*
http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=186)

UFA also supports reestablishing the system used in the 1984 plan that automatically reserved water levels for fish upholding the standard that if someone wants to remove water from a stream they must prove no harm to fish.

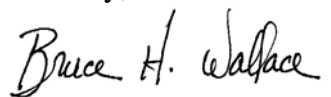
UFA supports a precautionary approach when making land management decisions with potential impacts on water and fisheries values, as adopted by the Alaska Board of Fisheries in the State’s Policy for management of sustainable salmon fisheries (5 AAC 39.222):
(5) in the face of uncertainty, salmon stocks, fisheries, artificial propagation, and essential habitats shall be managed conservatively as follows: (A) a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and habitat management, the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge, should be applied to the regulation and control of harvest and other human-induced sources of salmon mortality...

Considering the extent and value of the Bristol Bay salmon fishery, we should err on the side of caution.

UFA supports the mandate that DNR Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Bruce H. Wallace". The signature is written in black ink and is positioned to the left of a vertical red line.

Bruce Wallace
President