



UNITED FISHERMEN OF ALASKA

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June 28, 2013

Attn: Forrest Cole, Supervisor
Tongass National Forest
TNF 5-Year Review
648 Mission Street
Ketchikan, Alaska 99901-6591
Web: <http://tnf-5yearreview.com/>

RE: Comment on Five-Year review of the Tongass Land Management Plan

Dear Mr. Cole,

United Fishermen of Alaska is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout Alaska and its offshore federal waters. Eight of our member associations represent fishermen who participate in salmon fisheries in Southeast Alaska waters, and four represent salmon hatchery operations in Southeast Alaska waters. We are very aware of the successful rebuilding of viable salmon fisheries in Southeast Alaska after a period of near depletion under federal management before Alaska statehood. In 2011 the total Southeast Alaska salmon harvest was 73,000,000 salmon which yielded a ex-vessel value of \$225 million.

In this ongoing effort, the vital role of hatchery operations and the importance of the Tongass National Forest as salmon production habitat are closely linked. Therefore, we are asking for your support and a more open mind to the benefits of salmon hatcheries and their compatibility with wilderness designations in the Tongass National Forest.

UFA believes that the current reluctance of the USFS to approve aquaculture activities within the Tongass National Forest is contrary to the intent of the Alaska National Interest Lands Conservation Act (ANILCA). ANILCA Title 13, Section 1315 includes language that allows authorization of Aquaculture activities in Wilderness areas:

(b) AQUACULTURE.--In accordance with the goal of restoring and maintaining fish production in the State of Alaska to optimum sustained yield levels and in a manner which adequately assures protection, preservation, enhancement, and rehabilitation of the wilderness resource, the Secretary of Agriculture may permit fishery research, management, enhancement, and rehabilitation activities within national forest wilderness and national forest wilderness study areas designated by this Act. Subject to reasonable regulations permanent improvements and facilities such as fishways, fish weirs, fish ladders, fish hatcheries, spawning channels, stream clearance, egg planting, and other accepted means of maintaining, enhancing, and rehabilitating fish stocks may be permitted by the Secretary to achieve this objective.

While the language includes “may permit” and we understand that this does not necessarily mean that all proposed projects must be authorized, we feel that ANILCA shows the expressed intent to allow for enhancement and rehabilitation of salmon in the National Forest as well as in wilderness areas.

These projects should be given a fair and public process for consideration of the value of each individual project. As the Forest Service considers transition to a “new age” the benefits of enhancement to the region should be reevaluated in this review process.

Thank you for the opportunity to comment.

Sincerely,



Julianne Curry
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Fishermen’s Marketing Association
Alaska Independent Tendermen’s Association • Alaska Longline Fishermen’s Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Aleutian Pribilof Islands Community Development Association • Armstrong Keta • At-sea Processors 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 • 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 Catcher Boats • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association