



UNITED FISHERMEN OF ALASKA

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August 26, 2014

National Marine Fisheries – Alaska Region
Jon Kurland, Asst. Regional Administrator for Protected Resources
Attn: Ellen Sebastian
PO Box 21668
Juneau, AK 99802-1668
Via federal rulemaking portal: <http://www.regulations.gov/#!submitComment;D=NOAA-NMFS-2014-0051-0016>

RE: NOAA-NMFS-2014-0051; Petition to identify the Central North Pacific population of humpback whales as a DPS and to delist the population from the List of Endangered and Threatened Species under the ESA.

Dear Mr. Kurland,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. The majority of our membership is impacted in some way by species listed under the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA). **UFA is pleased to support the State of Alaska's petition to identify the Central North Pacific population of humpback whales as a distinct population segment (DPS) and to delist the population from the List of Endangered and Threatened Species under the ESA.**

UFA has had an opportunity to review the information provided by the State of Alaska and we concur with the outlined findings. Since NMFS completed a final recovery plan for the humpback whale in 1991, this population segment of humpback whales has recovered to the point that it is no longer threatened with extinction, and protection under the ESA is no longer required. As such, UFA respectfully requests that NMFS delist this population of humpback whales.

Extensive data from SPLASH (Structure of Populations, Levels of Abundance and Status of Humpback Whales in the North Pacific) information, photo identification projects, genetic studies and population studies all provide decisive evidence that the Central North Pacific population of humpback whales is under no threat of extinction.

According to NMFS data, humpback whales in the North Pacific are found throughout their historic range and have rebounded significantly since the termination of commercial whaling. The Central North Pacific humpback population presently growing at a rate of 5-7% per year. This represents the best available scientific information and noticeably indicates that the population will continue to increase significantly after being delisted as there will be no threat of over harvest due to unrestricted commercial whaling. It is also highly unlikely that

commercial whaling in any form will be allowed to occur regardless of potential management structures for harvest, therefore the primary threat to humpback whale recovery does not exist. Although interactions occur between humpback whales and shipping and vessel traffic, marine debris, and fishing gear, these interactions are infrequent compared to the overall population of Central North Pacific humpbacks. These interactions are catalogued by NOAA and are readily available.

UFA is pleased to support the State of Alaska’s petition to identify the Central North Pacific population of humpback whales as a distinct population segment (DPS) and to delist the population from the List of Endangered and Threatened Species under the ESA. We concur with the State’s assessment that: “The extensive data acquired by NMFS and others since the humpback whale was listed—particularly regarding distinctions among population groups within the North Pacific populations—warrants additional evaluation by NMFS of the current status of the species. The Central North Pacific stock is one subpopulation for which genetic and behavioral details are well defined. The numerical survey data demonstrate its recovery, and for these reasons, it should be delisted.”

Additionally, UFA would like to thank NOAA for extending the comment period which helped accommodate individuals and organizations in the seafood industry who are currently in the middle of the busy summer fishing season. If you have any questions as you move forward or need additional information regarding humpback whale observations by the seafood industry, please feel free to contact us.

Sincerely,



Julianne Curry
Executive Director

CC: Cora Campbell, Commissioner, Alaska Department of Fish and Game.

Douglas Vincent-Lang, Director, Division of Wildlife Conservation, Alaska Department of Fish and Game.

Ben Mohr, Special Assistant, Office of Governor Sean Parnell.

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 • 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