



UNITED FISHERMEN OF ALASKA

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January 15, 2015

Kristy Long
Office of Protected Resources
7600 Sand Point Way NE.
Building 4, Room 2122-4
Seattle, WA 98115

Via federal rulemaking portal

<http://www.regulations.gov/#!submitComment;D=NOAA-NMFS-2014-0146-0001>

Docket ID: NOAA-NMFS-2014-0146

RE: NOAA intent to develop guidelines on safely deterring marine mammals

Dear Ms Long,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 Alaska commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. **UFA is pleased to offer comments on the intent to develop guidelines on safely deterring marine mammals.**

UFA has commented several times in the past on ESA listings for marine mammals in Alaska as many marine mammal populations continue to grow. As marine mammal populations expand, so does the opportunity for an increase in marine mammal and human interactions. Although the vast majority of interactions are unremarkable, occasionally a marine mammal interaction will result in a threat to human safety or a significant threat to their business. In these circumstances it is crucial that reasonable measures can be taken to safely deter marine mammals in order to protect life and business and also to prevent entanglements.

Various methods can be used to prevent marine mammal interactions depending on the marine mammal, the fishery, and the gear being fished. Popular deterrents in Alaska include: pingers, Explosive Pest Control Devices (EPCD's or seal bombs), and loud noises. Determining guidelines for what deterrents are appropriate is extremely challenging given the vast differences in fisheries and marine mammals encountered throughout the United States. What is appropriate and useful in one region or fishery for a particular marine mammal might not be the same in another region or fishery.

UFA urges caution in developing guidelines as a "one size fits all" approach will not be practical or effective across the entire country or even throughout the entire state of Alaska. Please be general in developing guidelines and allow significant opportunity for stakeholders to work with deterrent manufacturers to meet any NOAA guidelines put in place. We also acknowledge that the effectiveness of marine mammal deterrents will be a moving target as

technology and research improves. UFA urges NOAA to refrain from developing guidelines that are overly specific.

UFA and our member groups look forward to opportunities to further marine mammal deterrent technology and research in order to aid in any guideline development. Our goal is to minimize negative interactions between humans, marine mammals, and fishing gear. Please feel free to contact us or any of our impacted member groups if you have any questions regarding our comments.

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