



UNITED FISHERMEN OF ALASKA

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National Marine Fisheries Service

Attn: Marta Nammack

1315 East-West Highway, room 13536

Silver Springs, MD 20910

Via federal rulemaking portal: <https://www.federalregister.gov/articles/2015/04/21/2015-09010/endangered-and-threatened-species-identification-of-14-distinct-population-segments-of-the-humpback>

RE: NOAA-NMFS-2015-0035; Identification of 14 Distinct Population Segments of the Humpback Whale and Proposed Revision of the Species-Wide Listing.

Dear Ms. Nammack,

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 various species listed under the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA). **UFA is pleased to continue to support the State of Alaska's petition and NMFS's petition to revise the listing status of humpback whales.**

UFA has had an opportunity to review the findings as outlined by NMFS and we fully support the use of science-based decision making to determine that an ESA delisting is warranted. UFA continues to concur with the outlined findings and information provided by the State of Alaska and we fully support their petition regarding humpback whales. Since NMFS completed a final recovery plan for the humpback whale in 1991, the Central North Pacific 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. Humpback whales will still receive proper protection under the Marine Mammal Protection Act (MMPA). 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 NMFS's finding regarding the Central North Pacific population of humpback whales. 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."

UFA applauds NMFS for their dedication to relying on science and verifiable information regarding humpback whales. 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

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 • 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