



UNITED FISHERMEN OF ALASKA

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September 21, 2009

Minerals Management Service
Attention: Leasing Division (LD);
381 Elden Street, MS-4010
Herndon, Virginia 20170-4817

**RE: 2010-2015 Oil and Gas Leasing in the Outer Continental Shelf
(Docket ID: MMS-2008-OMM-0045)**

United Fishermen of Alaska (UFA) provides the following recommendations for the Minerals Management Service Five Year Plan for 2010-2015 Oil and Gas Leasing in the Outer Continental Shelf. These positions were also included in our scoping comments for the North Aleutian Basin (Area 214) Oil and Gas development in October, 2008.

United Fishermen of Alaska is an umbrella association representing 37 diverse Alaska commercial fishing organizations operating in almost all nearshore and offshore areas off the coast of Alaska. UFA represents fishermen that harvest nearly half of the total sustainable, wild capture seafood harvest of the entire United States. UFA asserts that sustainable, wild capture seafood production is an integral part of our national food production, and as such it is essential to overall national security.

The North Aleutian Basin (NAB) Planning Area includes the Southeast Bering Sea and Bristol Bay regions of Alaska with the NAB proposed lease sale area encompassing nearly 5.6 million acres. Area 214 is located in the southeast portion of the NAB. Fisheries resources of the region that includes Area 214 in the SE portion of the NAB sustain the regional communities and support the most productive and sustainable commercial fisheries in the world. As the most important economic driver of the region, the commercial fishing industry has impacts extending throughout Alaska and the Pacific Northwest. As shown by National Marine Fisheries Service statistics, over 40% of the commercial U.S. fisheries catch including the nation's richest crab, pollock, cod, halibut, and salmon fisheries come from the Bering Sea region with annual harvests worth more than a half a billion dollars.

Both groundfish and shellfish fisheries completely overlap the proposed lease sale area 214. Shellfish harvested in significant numbers include Bristol Bay red king crab, Bering Sea tanner crab, and Bering Sea snow crab. Commercially harvested groundfish species include Pacific cod, Alaska Pollock, Pacific halibut, flatfish species, rockfish species, Atka mackerel and sablefish. The Bristol Bay and north Alaska Peninsula salmon fisheries depend on the large numbers of all five species of Pacific salmon that utilize the area for feeding and migration. Subsistence fisheries, while not economically comparable to the region's commercial fisheries, are vital to local communities. In order to appropriately evaluate the impact of oil and gas development in the NAB, a more complete assessment of fish stocks and fisheries that utilize the stocks is needed. At a minimum, the assessment should include impacts to population abundance and productivity, seasonal distribution, movement and migration patterns, and short and long term economic impacts.

Environmental and fisheries protections are a major concern for the members of UFA in the context of

nearshore (state waters) and Outer Continental Shelf (OCS) oil, gas and minerals development. Given the risks and challenges facing OCS development off the coast of Alaska, there is an urgent need to engage in a dialogue with the oil and gas industry to address UFA concerns.

UFA recommends these initial fisheries protections and mitigation measures in offshore oil and gas development:

- Legislative authorization to create Regional Citizens Advisory Councils for states, following approved OCS lease sales, to be funded by the approved leaseholders.
- UFA calls for the fisheries protections (attached) identified in Appendix A of the Aleutians East Borough/Lake and Peninsula Borough/Bristol Bay Borough Draft Memorandum of Understanding and Proposed Mitigation Measures for OCS Development in the North Aleutian Basin Planning Area.
- UFA calls for a clear description of the scope and size of oil and gas installations and what limitations they pose for fisheries.
- UFA opposes new seismic activity, and if such activity is required, it should be restricted to one round of activity with information to be shared by all leaseholders.
- UFA calls for zero discharges from drilling installations.
- UFA calls for gas and oil spill response and mitigation plans, to be developed in consort with a regional citizens advisory councils.
- UFA calls for establishment of an adequate fisheries disaster fund to provide compensation to the fishing industry and coastal communities in the event of disruption of fisheries.
- UFA calls for research on the potential impacts to seafood markets, in light of the Alaska Seafood Marketing Institute priority message that “Alaska seafood is wild, sustainable and harvested in the pristine waters off the coast of Alaska.”
- UFA calls for commitments from the oil and gas industry and the federal government to develop and implement a long term scientific monitoring program to assess potential impacts to the marine environment and the fisheries and marine resources of lease areas.
- UFA calls for commitments from potential leaseholders on environmental protection of fisheries and marine resources, and commitments to the Tri-Borough Mitigation Measures.
- UFA calls for a commitment to funding in whole or in part of scientific monitoring systems, enforcement, and related research and data needs.
- Overall, in the event of OCS development in the North Aleutian Basin, UFA calls for policies of conflict avoidance and mutual respect for shared access to the resources. To achieve this requires negotiated compromises.
- UFA opposes any use of offshore energy facilities for aquaculture.
- UFA requests that commercial fishing organizations be included in the planning process as stakeholders on par with the status of other cooperating municipal, state and federal agencies.

Thank you for your consideration of these comments,

Sincerely,



Mark Vinsel
Executive Director

MEMBER ORGANIZATIONS

Alaska Crab Coalition • 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 • Bristol Bay Regional Seafood Development Association • Cape Barnabas Inc.
Concerned Area “M” Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Crab Group of Independent Harvesters
Douglas Island Pink and Chum • Fishing Vessel Owners Association • 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 • Sitka Herring Association • 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 • Western Gulf of Alaska Fishermen

Attachment / Reference: UFA supports the fisheries protections (below) identified in Appendix A of the 2007 Aleutians East Borough/Lake and Peninsula Borough/Bristol Bay Borough Draft Memorandum of Understanding and Proposed Mitigation Measures for OCS Development in the North Aleutian Basin Planning Area (adopted by Aleutians East Borough and Lake and Peninsula Borough Assemblies):

Appendix A
Proposed Mitigation Measures for OCS Leasing
In the North Aleutian Planning Basin

Fisheries Protection

Lease related use will be restricted to prevent conflicts with local commercial, subsistence, and sport harvest activities. All OCS operations, both onshore and offshore, must be designed, sited and operated to ensure that:

- (a) adverse changes to the distribution or abundance of fish resources do not occur;
- (b) fish or shellfish catches are not adversely impacted by OCS activities;
- (c) all exploration, construction and operation activities will be coordinated with the fishing community to maximize communication, ensure public participation, and avoid conflicts;
- (d) ballast water treatment is required to remove or eliminate non indigenous species.
- (e) fishermen are not displaced or precluded from access to fishing areas, unless they are adequately compensated for the displacement;
- (f) fishermen are not precluded from participating in designated fishing seasons, unless they are adequately compensated for the lost season(s);
and
- (g) fishermen will be compensated for damage to fishing equipment, vessels, gear and decreased harvest value from OCS operations in a timely manner.