



Marine Conservation Alliance

promoting sustainable fisheries to feed the world

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Alyeska Seafoods

Alaska Crab Coalition

Alaska Whitefish Trawlers Association

Alaska Groundfish Data Bank

Alaska Pacific Seafoods

Alaska Scallop Association

Aleutian Pribilof Island Community Development Association

Akutun, Atka, False Pass, Nelson Lagoon, Nikolski, St. George

At-Sea Processors Association

Bristol Bay Economic Development Corp.

Aleknagik, Clark's Point, Dillingham, Egegik, Ekwok, King Salmon, Levelock, Manokotak, Naknek, Pilot Point, Port Heiden, Portage Creek, South Naknek, Togiak, Twin Hills, Ugashik

Central Bering Sea Fishermen's Association

St. Paul

City of Unalaska

Coastal Villages Region Fund

Cheforonak, Chevak, Eek, Goodnews Bay, Hooper Bay, Kipnuk, Kongiganak, Kwigillingok, Mekoryuk, Napakiak, Napaskiak, Newtok, Nighthute, Oscarville, Platinum, Quinhagak, Scammon Bay, Toksook Bay, Tunutuliak, Tunurak

Groundfish Forum

High Seas Catchers Cooperative

Icicle Seafoods

Mothership Group

PV Excellence
PV Ocean Phoenix
PV Golden Alaska

Norton Sound Economic Development Corporation

Brogvig Mission, Diomedes, Elm, Gambell, Golovin, Koyuk, Nome, Saint Michael, Savoonga, Shaktoolik, Stebbins, Teller, Unalakleet, Wales, White Mountain

Pacific Seafood Processors Association

Alaska General Seafoods
Alyeska Seafoods, Inc.
Golden Alaska Seafoods, Inc.
North Pacific Seafoods, Inc.
Peter Pan Seafoods, Inc.
Premier Pacific Seafoods, Inc.
Supreme Alaska Seafoods, Inc.
Trident Seafoods Corp.
UniSea Inc.
Westward Seafoods, Inc.

Prowler Fisheries

Trident Seafoods Corp.

United Catcher Boats

Akutun Catcher Vessel Assoc.
Arctic Enterprise Assoc.
Mothership Fleet Cooperative
Northern Vector Fleet
Peter Pan Fleet Cooperative
Unalaska Co-op
UniSea Fleet Cooperative
Westward Fleet Cooperative

U.S. Seafoods

Waterfront Associates

Western Alaska Fisheries, Inc.

Yukon Delta Fisheries Development Association

Alakanuk, Emmonak, Grayling, Kotlik, Mountain Village, Nunam Iqaa

December 31, 2009

Mr. Pat Pourchot

Special Assistant to the Secretary of the Interior for Alaska Affairs

Department of the Interior

Office of the Secretary

1689 C Street, Suite 100

Anchorage, AK 99501

Dear Mr. Pourchot,

Re: Secretarial Review of Federal Subsistence Program

These comments are being provided by the Marine Conservation Alliance (MCA) regarding Secretarial Review of the Federal Subsistence Management Program in Alaska. MCA is a broad based coalition of harvesters, processors, coastal communities, Community Development Quota organizations, and support services businesses involved in the groundfish and shellfish fisheries of Alaska. Our members collectively represent roughly 70% of North Pacific commercial fisheries and over half of the production of all U.S. seafood. MCA is a leading voice for sustainable fisheries in Alaska, and works for practical solutions to conservation and management issues.

First off, we want to thank you for taking the time to meet with various constituent groups regarding the Secretarial review of the Federal Subsistence Management Program in Alaska. We appreciate the efforts you have made to ensure that the review process is transparent and inclusive.

We also want to be very clear that we acknowledge and respect the importance of the subsistence way of life to Native and rural Alaskans, and the necessity of access to subsistence resources to rural Alaskans and Alaska's rural communities.

MCA understands and appreciates the Secretary's interest in reviewing the Federal subsistence management program. Since the initiation of the dual management system in the early 1990's, management issues have become increasingly complex, and concerns regarding the conservation and use of subsistence resources have grown, and demands on managers at both the state and federal level are straining agency resources. There are times when the periodic review of a major resource management program, such as the federal subsistence management program, is necessary to ensure that conservation needs are being met, and that the program is meeting both the spirit and intent of the law.

MCA believes that this review needs to be conducted with the utmost care. While, in our opinion, the dual management system is not the optimal solution it is the reality we all have to operate under. As other groups in the seafood industry have pointed out in comments submitted during this review process, commercial fisheries play a vital role in the economy and communities of rural Alaska. Changes in regulations, or processes to develop regulations, can have far ranging and often times unintended consequences. Fisheries management in particular requires a careful balancing among interests and jurisdictions because of the nature of the resource, and the ubiquitous role it plays in the subsistence way of life, rural and urban economies, and Alaska's social and community fabric.

A careful and thorough evaluation of subsistence issues requires a good hard look at all the information available. Because of this, we concur with the State of Alaska's request to extend the comment period into February 2010. This will allow time for all parties to provide the detail and information this issue warrants.

One question that came up recently regarded research and funding needs. We would like to take this opportunity to outline some of the contributions the Alaska seafood industry puts into research and conservation of fisheries resources. While it is not possible to pull together a comprehensive list in the time remaining for the existing comment period, we have included for your information examples that illustrate the industry's commitment to sustainable fisheries in Alaska. These include:

1. Gulf of Alaska, Bering Sea, and Aleutian Islands observer program. This is an industry funded, federally operated, observer program that places trained observers on fishing vessels and in processing plants that participate in Alaska's groundfish and shellfish fisheries. These observers collect biological information and provide data to implement catch and bycatch control measures, many of which are intended to control and reduce incidental catches of important subsistence resources such as salmon. As of FY08, the total number of observers was 464 for approximately 39,000 observer days at an annual total cost of \$18,588,216, of which the industry funds \$13,000,000 or 70%.
2. American Fisheries Act fleet management/hotspot closure program. This program monitors daily the pollock fleet operating in the Bering Sea/Aleutian Islands management area. Among one of its primary purposes is to monitor salmon bycatch and direct the fleet away from areas of high salmon encounters. The cost of this program is borne by industry.
3. Cooperative research. Industry conducts several cooperative research programs to improve the conservation and management of fishery resources. These include efforts to develop new net devices called excluders to reduce salmon bycatch in the Bering Sea trawl fisheries (salmon excluders), and similar devices in the Gulf of Alaska trawl fisheries to reduce halibut bycatch (halibut excluders). Industry is also working with federal scientists to determine if sea temperature can be used as a way to avoid high salmon abundance areas in the ongoing effort to reduce salmon bycatch in fisheries such as the Bering Sea pollock fishery. Other efforts include measures to reduce seabird and marine mammal interactions, gear modifications to protect bottom habitat, and improved

handling techniques for crab to reduce mortality. These programs all either directly or indirectly benefit subsistence users in rural Alaska. Many of these programs are jointly funded with federal and industry funds. Total funding is in the several millions of dollars.

4. Pollock Conservation Cooperative Research Center. The PCCRC is funded through donations from the At-Sea Processors for conducting marine research in conjunction with the University of Alaska. Over the past ten years the PCCRC has funded over \$10,000,000 in research.

5. Habitat assessment and restoration. Through the MCA Foundation (MCAF), a mix of federal, private, and state funds have been used to conduct habitat evaluation and restoration projects. Examples include a major habitat mapping project for the Pribilof Canyon in the Bering Sea conducted jointly by MCAF, NOAA, and the University of Alaska. Pribilof Canyon has been identified as an area of concern to rural Alaskans from the Pribilof Islands. Industry believes that the best way to address such concerns is to first get the best science we can on the nature and extent of important habitats in this area, and then determine if additional management actions are warranted.

6. The MCAF is also conducting one of the nation's largest marine debris clean-up programs. Marine debris can have negative impacts on a wide variety of marine resources including subsistence resources. MCAF clean-up projects have been conducted all along the coast from Southeast Alaska to Bering Strait. This program often hires local rural residents, providing cash in small communities throughout rural coastal Alaska. Well over 1 million pounds of debris have been removed to date. MCAF is currently sponsoring debris assessments throughout Alaska (including the Arctic) to better gauge the extent of the problem. In conjunction with the clean-up effort, MCAF also has a fleet education program, conducted by the Alaska Marine Safety Education association (AMSEA) program, to educate fishermen about the need and methods to reduce marine debris. These programs, either directly or indirectly benefit rural Alaskans. This program uses a mix of federal, state and private funding. Since 2003, the total cost has been approximately \$2.9 million.

The above are a few examples of industry efforts to further scientific research and conservation of Alaska's marine resources. If you would like a more comprehensive listing we can provide that with a little extra time upon request.

In addition to supporting the extension for comment, MCA offers two additional recommendations for next steps in this review.

First, MCA strongly recommends that a second consultation phase be added after your initial review and before draft recommendations are sent to the Secretary. This second round of consultation would provide the opportunity to better analyze and fine tune the draft recommendations before they go to the Secretary for consideration. We view this as a vital step in this review process. As noted by many other commentators, such as United Fishermen of Alaska and the Pacific Seafood Processors Association, the management system for Alaska fisheries is complex and closely interwoven. The open ended nature of the consultation to date

has made it difficult for the public, including the seafood industry, to provide specific comments in sufficient detail. We believe that a round of consultation on your initial draft recommendations can provide useful feedback to the process and may assist in honing the recommendations to address rural concerns while avoiding unnecessary problems or unanticipated consequences.

As a final recommendation, we urge that consultation also occur between the Secretary and the Secretary of Commerce. In conversations with you and your staff, it was clear that the Secretary was consulting with the Secretary of Agriculture regarding subsistence issues on Forest Service lands. It was less clear if the Secretary is going to consult with Commerce. The Department of Commerce oversees important fishery management programs in federal waters off Alaska's shores. While these fisheries are not subject to ANILCA, they do play an important role in the overall makeup of Alaska's fishery management system. The Secretary may also wish to consult directly with the North Pacific Fishery Management Council, given their pivotal role in fishery management under the Magnuson Stevens Act.

Again, thank you for this opportunity to comment on the Secretarial Review of the Federal Subsistence Management Program. If we can provide any additional information or be of any other assistance as you conduct this review, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "David Benton". The signature is fluid and cursive, with the first name "David" and last name "Benton" clearly distinguishable.

David Benton
Executive Director

Copy:

Governor Sean Parnell, State of Alaska

Senator Lisa Murkowski

Senator Mark Begich

Congressman Don Young

Commissioner Denby Lloyd, Alaska Department of Fish and Game

Mr. Kim Elton, Director of Alaska Affairs, Department of the Interior

Mr. John Katz, Director of State/Federal Relations, Office of the Governor, State of Alaska