

North Pacific Fishery Management Council

Dan Hull, Chairman
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March 5, 2018

Ms. Kelly Hammerle,
National OCS Oil and Gas Leasing Program Manager
Bureau of Ocean Energy Management (VAM-LD)
45600 Woodland Road
Sterling, VA 20166-9216

Dear Ms. Hammerle,

On behalf of the North Pacific Fishery Management Council (Council), I wish to express our thanks for the opportunity to comment on the Draft Proposed Program for Outer Continental Shelf Oil and Gas Leasing for 2019-2024, and the potential for lease sales in Alaskan waters. The North Pacific Fishery Management Council was established by the Magnuson-Stevens Fishery Conservation and Management Act to manage commercial fisheries in the Gulf of Alaska, Bering Sea and Aleutian Islands, and Arctic Ocean off Alaska.

Commercial fisheries in Alaska provide significant benefits to the nation. Alaska's commercial fishing and seafood industry annually generates about \$4.4 billion in sales impacts, \$1.9 billion in income impacts, \$2.4 billion in value-added impacts, and 53,400 full- and part-time jobs.¹ Fisheries from the Gulf of Alaska, Aleutian Islands, and the Bering Sea provide over half of the U.S domestic seafood production. As the world's population continues to increase, these renewable food resources and the employment opportunities they provide will grow in importance. In order to safeguard these benefits to the U.S. and the world, offshore energy development must minimize risks to marine species and existing human uses.

As you may be aware, the Council has long been recognized as a leader in sustainable fishery management. Our ecosystem-based approach to fishery management ensures that fisheries in the Gulf of Alaska, Aleutian Islands, and the Bering Sea will continue to supply the Nation and the world with the highest quality wild Alaskan seafood, provide jobs for thousands of Americans, and protect the fishery dependent communities and subsistence way of life that is important in many Alaskan communities. Alaska's diverse and sustainable fisheries rely on the clean, pure waters of the North Pacific, and the well-deserved reputation of the products that come from our waters make wild Alaskan seafoods prized worldwide.

The waters and benthic substrates in the Gulf of Alaska, Aleutian Island, and Bering Sea provide Essential Fish Habitat (EFH) for commercially important species in Alaska. The Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with the National Marine Fisheries Service for any projects that have potential to affect EFH. Oil and gas exploration and development activities have the potential to directly and indirectly affect EFH and its ability to maintain sustainable fish stocks. We have expertise on our staff to provide data and review of potential impacts to EFH for any potential projects. We encourage you and your Department to consider the risk of negative

¹ Fisheries Economics of the United States, 2015. NOAA Tech. Memo. NMFS-F/SPO-170. May 2017.

impacts to EFH, and the attendant risks to both the reputation of Alaska's wild seafood and the sustainable management of Alaska's fish resources.

Because of the substantial risk to the sustainable management of Alaska's fisheries, and the potential economic and ecological impacts that attend oil and gas exploration and development, we strongly support the recommendation from Alaska's congressional delegation, Kawerak, Inc., the Bering Sea Elders Group, and many others to remove the Hope Basin, Norton Sound Basin, St. Matthew-Hall, Navarin Basin, Aleutian Basin, Bowers Basin, Aleutian Arc, St. George Basin, Shumagin, Kodiak, and Gulf of Alaska from the Draft Proposed Program.

Thank you for considering our comments. We understand that under the Outer Continental Shelf Lands Act Section 18 Requirements, there will be additional opportunities for the NPFMC to participate in the review process and we look forward to engaging with you and your Department on a final program for 2019-2024.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, flowing style.

Dan Hull
Chairman, NPFMC

Cc: The Honorable Ryan Zinke, Secretary, Department of the Interior
The Honorable Bill Walker, Governor, State of Alaska
Senator Lisa Murkowski, Alaska
Senator Dan Sullivan, Alaska
Congressman Don Young, Alaska