



Alaska Longline

FISHERMEN'S ASSOCIATION

Box 1229 / Sitka, Alaska 99835

907.747.3400 / FAX 907.747.3462

John Goll, Alaska Regional Director
Minerals Management Service
3801 Centerpoint Drive
Anchorage, AK 99503-5823
sale214NOI@mms.gov

Re: North Aleutian Basin Sale 214 Scoping Comments

Dear Mr. Goll,

The Alaska Longline Fishermen's Association (ALFA) is a non-profit fishermen's association promoting sustainable longline fisheries, healthy marine ecosystems, and strong coastal communities through resource stewardship and active participation in resource management. I submit the following comments on the proposed Bristol Bay/southeast Bering Sea offshore oil and gas lease sale (North Aleutian Basin Sale 214).

The Bering Sea supports the most productive and valuable fisheries in the nation accounting for 50% of the domestic seafood harvest. The importance of Bristol Bay and southeast Bering Sea waters to the fishing industry cannot be overstated. The area proposed for oil and gas leasing overlaps fishing grounds and important habitat, including nursery habitat for juvenile halibut and blackcod. Halibut are one of the best managed fisheries in the world. The halibut resource is critical to subsistence users in Alaska and supports a 100 year old commercial setline fishery. Halibut are also a valuable recreational species and a target species for the charter industry.

The Alaska longline fishery is comprised of thousands of small business owners who rely on the continued health of natural, renewable resources for their livelihoods. We have consistently supported sustainable fisheries management, accepting large cuts in our allocation in an effort to protect resource health. The health of coastal communities depends on the health of the longline fishery in addition to healthy fish populations. We urge you to adequately consider the potential impacts of offshore oil and gas activities to the many permit holders, vessel owners, harvesters, crew members, seafood processors, support industry businesses, as well as to their families and communities that rely upon the health of these resources for their economic and subsistence livelihoods.

The Environmental Impact Statement (EIS) should, using the best available science, address the following issues of importance to the fishing industry:

- The EIS should analyze potential impacts to all commercial fisheries resources at all life stages with a specific focus on sensitive life stages such as nursery grounds and juvenile rearing and spawning habitat that could be affected by OCS activities.
- The EIS should explicitly acknowledge all data gaps related to commercial fishery resources that may lead to an incomplete analysis of potential impacts to such resources and all data gaps which could preclude effective mitigation. The EIS should explain how MMS intends to fill these data gaps in a timely manner and if they are not filled, how it will utilize the precautionary principle when it comes to potential unknown impacts on fishery resources.
- The EIS should analyze potential impacts of drilling discharges (those which may be permitted and others which may be accidental) including sub-lethal effects, to commercial groundfish species, halibut, crab, and other benthic species – especially those that have sensitive life stages in and around the area proposed for leasing.
- The EIS should include an explicit analysis of potential impacts of drilling activities to fishing operations including gear loss, fishing ground loss, competition for supplies, fuel, dock space, housing etc. All methods for potential compensation for the loss of gear, loss of fishing grounds, loss of fishing time and any fishery closures resulting from spills or other pollution incidents should be discussed in the EIS. The discussion should include who would be eligible for such funds (i.e. would they only be available to harvesters, vessel owners, etc. with no compensation for supply industries, processing workers, etc.) the procedures, time/resources needed for pursuing those funds, the likelihood of receiving them, and expected compensation amounts relative to the value of the fisheries in the region which are among the most lucrative in the world.
- The EIS should analyze potential cumulative impacts from proposed offshore oil and gas drilling that may occur as a result of climate change, from offshore oil and gas leasing in the Chukchi Sea, and from the potential development of a large open pit gold/copper mine at the headwaters of the Bristol Bay region known as Pebble Mine.
- The EIS should analyze how the fishing industry in the region may be potentially affected if offshore oil and gas activities exacerbate declines in species listed under the Endangered Species Act or those listed as depleted under the Marine Mammal Protection Act, with a specific focus on the Steller sea lion, North Pacific right whale, and seabirds.

- The EIS should analyze the potential impacts of drilling-related infrastructure both onshore and offshore including platforms, wells, pipelines, roads to commercial fishery resources and the commercial fishing industry itself- including a specific analysis of the likely reduction of fishing area and the volume, value, and composition of species harvested in that area.
- The EIS should analyze how commercial fisheries resources could be affected if nearshore and coastal habitats were contaminated by an oil spill or other pollution event that resulted in a short to long-term degradation of that nearshore habitat. Specific nearshore areas should be addressed and their importance to the overall health of certain commercially important species.

As fisheries continue to decline globally, Alaska continues to maintain a reputation for having the best-managed fisheries on Earth; please ensure that the actions of the offshore oil and gas industry do not undermine this significant accomplishment.

Sincerely,

A handwritten signature in black ink that reads "Linda Behnken". The signature is written in a cursive style with a long, sweeping underline.

Linda Behnken