

March 5, 2012

National Ocean Council
722 Jackson Place, NW
Washington, DC 20503

Re: Comments on National Ocean Policy Draft Implementation Plan

Dear Members of the National Ocean Council:

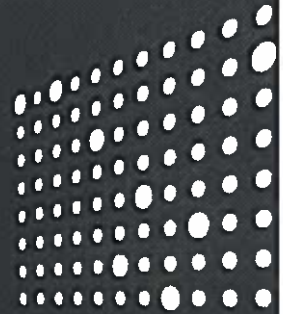
The Alaska State Chamber of Commerce (Alaska Chamber) is pleased to submit comments on the National Ocean Policy Draft Implementation Plan (Plan). The Alaska Chamber is a diverse organization representing nearly 500 business members from across the state. Alaska Chamber members employ tens of thousands of private sector workers.

Alaska businesses are increasingly challenged by a dwindling supply of oil in the pipeline, rising energy and logistics costs, burdensome state and federal regulations, infrastructure deficiencies, and domestic and global competition.

The people of Alaska cannot afford added policies that further restrict Alaskans ability to access and develop our state's natural resources. The Plan provides for actions that seek to protect millions of acres of land as "high conservation priorities." The draft Plan could result in federal entities excluding human activities from large areas of Alaska waters and lands through the implementation of "coastal and marine spatial planning" and new designations of marine protected areas. This is simply another federal land seizure of millions of acres of onshore and offshore areas by creating regulations that apply to both land and water based activities.

Alaska, with more coastline than all other states in our nation combined, is a maritime state. The Alaska Chamber understands that Alaska's broad diversities, including the Arctic and vast coastlines, and our diverse uses of water and natural resources, will require many critical aspects to be assessed. The National Ocean Council said it will include Regional Fishery Management Councils (RFMC), such as the North Pacific Fishery Management Council, in the proposed Regional Planning Bodies. However, seats are limited to federal, state, tribal, or local government RFMC voting members and exclude private sector members.

The idea that the policy is intended to be flexible and guided by regions is contradicted by the fact that state and local officials, stakeholders, and the public are forced to respond to deadlines, schedules, and directives from federal officials in Washington, D.C. The continued refusal to open up membership of regional planning bodies to individuals outside of government who represent the sectors and communities that will be impacted reflects the top-down characteristics of the policy.



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The Alaska Chamber urges representation from economic stakeholders, not limited to, but including oil and gas leaseholders, coastal communities and boroughs, fishing and fish processing, and transportation users.

All Alaskans rely on marine transportation to deliver the essential items for living in this state, everything from groceries to construction materials to fuel for transportation and heating. The Plan has the potential to deprive our state of the ability to engage in essential transportation necessary to the livelihoods of Alaskans. The Plan's call to "minimize and/or mitigate the risk associated with vessel use and carriage of heavy-grade fuel oil in the Arctic" must not be used as a means to deprive the State of the essential transportation and trade lanes and to limit commerce.

While the Plan says it will create no new regulations, references to regulatory actions under the policy are mentioned throughout, including statements that "successful implementation will require concerted activities, including the use of regulatory ...measures."

The 118 page document proposes 53 federal actions and nearly 300 milestones, including 158 to be completed by the end of next year. Significant federal dollars will be required to implement this policy, with the draft Plan noting that federal agencies are asked to consider how existing resources can be repurposed and that federal agencies have been instructed to prioritize the National Ocean policy into their FY2012 budgets.

Alaskans cannot afford another new and expensive initiative that will drive resources away from programs that support the ability of Alaska employers to operate and support our citizens and communities.

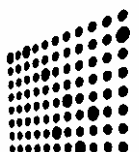
Adding another layer of bureaucracy will only add costs, time, and uncertainty to investments and businesses in Alaska. The people of Alaska already live in a state filled with federal regulatory oversight, and our economy cannot afford additional policies that further restrict our ability to access and develop the State's natural resources.

The Alaska Chamber respectfully urges the National Ocean Council to discard this Draft Implementation Plan and bring forth a new Plan that will promote responsible and economically feasible resource development in Alaska.

Sincerely,



Rachael A. Petro
President/CEO





RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

March 28, 2012

National Ocean Council
722 Jackson Place, NW
Washington, DC 20503

Submitted via <http://www.whitehouse.gov>

Re: Comments on the National Ocean Policy Draft Implementation Plan

Dear National Ocean Council Members:

Thank you for the opportunity to comment on the National Ocean Policy Draft Implementation Plan (Draft Plan).

The Resource Development Council for Alaska, Inc., is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism, and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC has submitted comments regarding the plan on several occasions, and again urges the National Ocean Council (NOC) to fully consider the following concerns regarding the Draft Plan:

RDC is concerned with the potential negative impacts National Ocean Policy will have on Alaskan communities and projects. The Draft Plan includes 53 actions and almost 300 benchmarks, of which more than half are supposed to be completed by the end of 2013.

This plan places additional burden and uncertainty on Alaskans, threatening to further restrict our ability to access and responsibly develop our natural resources. Alaska has the highest interest in protecting and ensuring the protection of our coastal and marine resources. These resources are vital to Alaska's economy. Alaska, and the U.S., can benefit from our largely untapped resources such as the estimated 27 billion barrels of oil and the 132 trillion cubic feet of natural gas in the Outer Continental Shelf. But development of these resources must not be further restricted or further hindered by unnecessary bureaucratic delay.

In part, Alaska was granted statehood due to our vast natural resources, the federal government expected Alaska to utilize its natural resources to build and sustain its economy. Note that Alaska's constitution includes, "It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public

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Ex-Officio Members
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Governor Sean Parnell

interest.” But, we must have access to our resources, and avoid uncertainty and unnecessary regulations that offer no added benefit to the environment.

In regard to public policy, RDC questions how the policy can proceed without Congressional authorization. Implementation of the Plan will likely cost a considerable amount of federal dollars and adds another level of bureaucracy to our already highly regulated and protected oceans and surrounding areas. The Draft Plan’s national objectives should focus on reducing unnecessary measures and improving existing programs and policy.

In response to the recent announcement to include a seat on the Regional Planning Bodies (RPB) for a member of the Regional Fishery Management Councils (RFMC), RDC is disappointed in the limiting factor that the individual must be a government representative. This continued refusal to include stakeholders outside of government reflects the lack of consideration for all other stakeholders. Additionally, RDC remains concerned that the authorities of the RFMCs to manage fisheries will be undermined by the actions of the Regional Planning Bodies. Having a single seat on the RPB does not mitigate this concern.

Coastal and Marine Spatial Planning

RDC continues to be concerned with the NOC’s goal to develop Coastal and Marine Spatial Planning (CMSP). RDC reiterates our previous recommendation to use areas interested in and supportive of CMSP as pilot projects. CMSP should not be enforced by the federal government in areas which are already well managed and where it is unsolicited.

Further, the Handbook for Regional CMSP should be subject to public input, review, and comment. All stakeholders should have the opportunity to be engaged, and all science, including that of industry, should be used to develop any policy. CMSP should be transparent and should demonstrate exactly what the program is expected to achieve, how such actions will be achieved, and who has authority to make related decisions.

Changing Conditions in the Arctic

The Draft Plan calls for improvement of Arctic development response, coordination of science and data, and new studies. The NOC must ensure the new studies and efforts do not unnecessarily delay or curtail activities, effectively making those activities unviable.

Regulations intended to reduce sea ice loss will likely negatively impact Alaska’s economy at a disproportionately higher magnitude.

Conclusion

Before further proceeding, the NOC must fully consider the potential economic impacts that the National Ocean Policy may have on industries across the nation, including fishing, oil and gas, energy, mining, transportation, tourism and more.

In addition to the comments above, RDC respectfully endorses the more detailed comments developed by the National Ocean Policy Coalition (dated February 27, 2012).

Thank you for the opportunity to comment.

Sincerely,



Marleanna Hall
Projects Coordinator

Alaska Oil and Gas Association



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Kate Williams, Regulatory and Legal Affairs Manager

March 28, 2012

National Ocean Council
722 Jackson Place, NW
Washington, DC 20503

Re: Comments on the Draft National Ocean Policy Implementation Plan

Dear Members of the National Ocean Council:

The Alaska Oil and Gas Association (AOGA) appreciates the opportunity to provide comments on the Draft National Ocean Policy (NOP) Implementation Plan (Draft Plan), released on January 12, 2012. AOGA is a business trade association whose member companies represent the majority of oil and gas exploration, development, production, transportation, refining, and marketing activities in the state.

The Draft Plan covers the nine NOP national priority objectives, two of which are of particular interest to AOGA, Changing Conditions in the Arctic and Coastal and Marine Spatial Planning (CMSP), and replaces the previous effort to issue Strategic Action Plans for each objective. AOGA remains engaged on this issue because of the policy's potential to significantly impact resource and economic development in Alaska. We continue to be concerned about the lack of detail included in the Draft Plan, and thus the ability to provide substantive, meaningful input on implementation of the NOP.

For example, under the priority objective to "Inform Decisions and Improve Understanding," science activities will be informed by recommendations from *Science for an Ocean Nation: An Update of the Ocean Research Priorities Plan*. As of the public comment deadline, however, the report has yet to be released to the public. Furthermore, important details regarding implementation of CMSP were not included in the Draft Plan, and instead will be addressed in the *Handbook for Regional Coastal and Marine Spatial Planning*. To date, the Handbook has not been released, and there is no assurance that public comment will be collected.

AOGA agrees that more streamlined permitting and regulatory processes are needed, but that this should be accomplished through existing statutory and regulatory regimes. According to statements by the National Ocean Council (Council) and other senior level officials in the Administration, the NOP will not change existing Federal authorities and responsibilities; however, the Draft Plan includes contradictory language. For example, language is included that the NOP and Draft Plan

“do not change existing Federal authorities and responsibilities,” yet one of the milestones for the Legal Working Group for 2013 is to complete review of Ecosystem-based Management-relevant statutes and regulations to identify “potential legislative changes that would fill gaps and support full implementation of EBM.” The Council needs to clarify in the final plan that the NOP will only be implemented through existing statutory and regulatory regimes.

Furthermore, under the priority objective to better coordinate and support management of our oceans, coasts and Great Lakes, the Council should address the importance of and need for streamlining permitting processes across all agencies, rather than just focusing on a pilot project for aquaculture permitting.

Under the priority objective addressing changing conditions in the Arctic, the Draft Plan does not acknowledge, but should, existing government and industry Arctic prevention and response capabilities. For example, the oil spill response plan for Shell’s 2012 oil and gas exploration programs in the Beaufort and Chukchi Seas that was recently approved by the Bureau of Safety and Environmental Enforcement; significant oil spill prevention and response capabilities have been developed and will be available and onsite this summer as part of Shell’s exploration programs. In fact, these programs cannot and will not proceed in the absence of adequate response capabilities.

Of primary concern to AOGA is CMSP, particularly the potential for the program to result in exclusionary zoning of Alaska’s oceans and coastline and additional layers of bureaucracy for project planning and development purposes, and thus, increased project delay, costs and uncertainty. Language in the Draft Plan also raises concern that the geographic scope of the NOP will be expanded beyond the coast to include inland areas.

Importantly, the Draft Plan includes very little information on the Regional Planning Bodies (Planning Bodies), only that membership will be restricted to Federal, state and tribal authorities relevant to CMSP. Stakeholders will have no direct representation on the Planning Bodies, despite the fact that they are charged with creation and implementation of regional CMS plans encompassing all ocean and coastal uses. AOGA believes membership on the Planning Bodies should be expanded to include representatives from these stakeholder groups. However, at a minimum, the Draft Plan should specify the processes and procedures for stakeholder and public engagement with the Planning Bodies on CMSP issues. Apparently, this information will be included in the Handbook, but again, it is not clear whether public input will be collected or the policies included in the Handbook discretionary or mandatory. Additionally, it will take time for the Planning Bodies to organize and establish CMS plans; therefore, the Draft Plan should clarify that lack of a Planning Body in a region or CMS plan does not in any way impact project approvals under existing statutory and regulatory regimes.

Finally, with regard to CMSP, the Council is charged with “certifying” the regional CMS plans. However, no details are provided on the process or criteria that will be used to certify the plans and there has been no indication that this information will be provided in the CMSP Handbook or otherwise made available for public review and input.

In general, AOGA is concerned the NOP, particularly CMSP, will be used as a tool for litigation given the lack of detail described above and prevalent throughout the Draft Plan. This is a real concern and one the NOC should acknowledge before pursuing implementation much further or so broadly across regions.

AOGA is also concerned about how plan implementation will be funded, especially given scarce Federal resources across all agencies. Implementation of the NOP should not be given priority over existing regulatory and permitting programs necessary for approval and oversight of resource and economic development projects in Alaska and elsewhere or funds diverted away from these programs.

Developing Alaska's vast Outer Continental Shelf (OCS) resources is essential to any effort to reduce the nation's dependence on foreign sources of oil and should not be unjustifiably impeded by unclear project regulation and development procedures. Alaska's OCS is estimated to hold approximately 27 billion barrels of oil and 132 trillion cubic feet of natural gas, the development of which would translate into an annual average of 54,000 new jobs over 50 years, \$145 billion in payroll throughout the U.S. and \$193 billion in revenues to state, local and Federal governments. These resources are also vital to stemming the decline of throughput through the Trans-Alaska Pipeline, identified as critical national infrastructure, which is currently operating at one-third capacity and will face continued operational challenges without additional supply. Implementation of the NOP should not hinder efforts to develop the resources contained in Alaska's OCS.

AOGA does not agree that the NOP should be implemented without detailed information on all aspects of implementation, including the science that will be used and collected to inform implementation and how the Regional Planning Bodies will operate and the policies and procedures for development of CMS plans and public engagement. At a minimum, AOGA believes that implementation should not occur until there has been opportunity to provide input on these important issues.

In addition to the comments outlined above, AOGA also endorses the comments of the National Ocean Policy Coalition. If you have any questions on our comments or concerns with implementation of the NOP, please do not hesitate to contact me.
Sincerely,

Sincerely,



KATE WILLIAMS
Regulatory and Legal Affairs Manager

**COMMENTS ON THE DRAFT
NATIONAL OCEAN POLICY IMPLEMENTATION PLAN**

Released January 12, 2012

Comments Submitted By:

**Alaska Bering Sea Crabbers
Alaska Crab Coalition
Alaska Groundfish Data Bank
At-sea Processors Association
Crab Group of Independent Harvesters
Deep Sea Fishermen's Union
Fishing Vessel Owners Association
Freezer Longline Coalition
Groundfish Forum
Pacific Seafood Processors Association
Petersburg Vessel Owners Association
Southeast Alaska Fishermen's Alliance
United Catcher Boats
United Fishermen of Alaska
West Coast Seafood Processors Association**

Comments Submitted February 27, 2012

INTRODUCTION

These comments are being submitted in response to the request for public input on the Draft National Ocean Policy Implementation Plan which was released on January 12, 2012. This document was released as part of the Administration's continuing effort to impose a new national regulatory process for zoning ocean activities and regulating the actions of ocean user groups.

The commercial fishing and processing organizations submitting these comments represent numerous companies which participate in the federally managed fisheries in the Exclusive Economic Zone off Alaska, Washington, Oregon and California, along with businesses that rely on these companies. These fisheries comprise over 55% of the annual commercial seafood harvest of the United States. The yearly direct value is over two billion dollars, with hundreds of millions of dollars of secondary economic effects resulting from our expenditures in other sectors such as shipyards, marine equipment, seafood packaging, insurance and finance, and transportation providers.

These associations, and the dozens of companies they represent, have been involved in this issue for well over a decade since the ocean policy commissions began preparing their reports. We have offered our views each step of the way since then. When the recommendations of the oceans commissions were put into legislative form by various environmental groups (H.R. 4900/108th Congress, H.R. 2939/109th Congress, H.R. 21 in the 110th and 111th Congresses) we provided comments and testimony along with many other ocean user groups. After Congress repeatedly refused to enact this legislation, the approach of the environmental community changed and H.R. 21 reappeared in the form of the Administration's National Ocean Policy (NOP). The NOP was given life through the President's proclamation of Executive Order 13547 on July 19, 2010. We now are being offered another opportunity to provide comments on the NOP Implementation Plan, the Administration's effort to impose a new regulatory program for the oceans and Great Lakes.

Although we are again submitting comments, we are disappointed that despite the importance of our industry to the nation's economy, and despite our familiarity with ocean ecosystems, our comments at each step in this process have been ignored. We continue to present what we think is an obvious case: the NOP's Coastal Marine Spatial Planning/Regional Planning Body structure is an unauthorized new regulatory program aimed at imposing a new ocean governance structure which conflicts with successful Congressionally authorized programs such as regional fishery management. Nevertheless, we remain committed to participating in the process and we hope that the Administration will eventually make this as transparent and collaborative a process as has been claimed all along.

THE IMPLEMENTATION PLAN

The Draft Implementation plan proclaims four overarching themes. We will briefly address each.

Adopt Ecosystem-Based Management

This has been a goal of resource managers for many years. It is a goal that we support. But, as any oceanographer will tell you, it is also a goal that cannot be fully achieved without vast amounts of additional scientific data that will take decades to collect and interpret, even assuming that funding is available. In the meantime, resource managers must use the best available data to manage our ocean resources. Progress has definitely been made in moving from single species management to using ecosystem principles. In fact, the fishery management process used by the North Pacific Fishery Management Council incorporates consideration of ecosystem effects for almost all decisions they make and the Pacific Fishery Management Council is well along on adopting a similar process. Nevertheless, we are a long way from being able to claim that we understand any ecosystem well enough to be able to simultaneously manage all the species which interact within a given region. This is especially true given that current law requires specific actions – rebuilding overfished stocks, protecting endangered or threatened species, protecting marine mammals – which elevate certain species to a higher plane than others within an ecosystem.

Obtain, Advance, Use, and Share the Best Science and Data

As we just pointed out, everyone supports collecting and using the best possible science. But doing so requires large amounts of money and time. We hope that the federal budget will soon allow a greater allocation of funds toward this goal. But, in the meantime, scientists and resource managers will have to do the best job they can with the data that is available. To the extent that funding is not available to provide precise, accurate and current data which allows the best management of ocean resources, we need to be careful not to set goals which are technically unobtainable.

Promote Efficiency and Collaboration

Once again, we are all in favor of greater cooperation and coordination among the agencies which regulate ocean activities. Interestingly, when discussing this theme the document states, “This draft Implementation Plan creates no new regulations, however, within existing authorities, legal and regulatory barriers to full implementation of the National Ocean Policy will be identified and permitting processes will be streamlined.” This statement is as close as we have seen to an admission that there is no specific

statutory authority for this program. It also suggests that the Administration intends to impose new regulations where necessary in order to eliminate the “regulatory barriers” they identify, and to seek new legislation that would provide the statutory authority.

Strengthen Regional Efforts

The final theme is to strengthen regional, state and local ecosystem conservation efforts. We doubt anyone would be opposed to this goal, and as long as the resources are available it is something we would support. At the same time, we suggest that since federal funds are scarce, the Administration should focus on supporting existing organizations with a record of success, such as the regional fishery management councils and the federal scientists on whom they rely.

Fiscal Responsibility

There is a discussion of Fiscal Responsibility on page 5 of the document. It says that the National Ocean Council will issue an annual memorandum on how federal resources should be allocated. We think it would be more useful if a detailed NOP implementation budget were developed and presented to Congress. Given federal budget constraints, it is almost certain that Congress will continue to refuse funding for the NOP initiative unless such a budget plan is offered. Providing a budget proposal that is subject to public scrutiny and debate will also increase transparency of the process. The document itself even admits that carrying out the Implementation Plan is, “contingent on the availability of funds”. This is one of the reasons we have argued since the beginning of this process that if NOP is to be pursued it should involve small steps and pilot projects. We fear that if various agencies attempt to implement this massive program within their current budgets, large amounts of money will be diverted from ongoing, Congressionally mandated programs. An example of the threat posed by such a diversion of funds is the possibility that certain fishery stock assessment surveys done in the North Pacific could switch from being done annually to being done bi-annually. Lowering the quality of the data available to fishery managers would threaten economic activity worth over one billion dollars annually. As an affected industry, we and our employees are not ready to see our livelihoods threatened should implementation of the National Ocean Policy result in funds being siphoned off from existing NOAA fishery programs.

Treatment of Commercial Fisheries

As we said earlier, the commercial fishing industry has now participated in this process for over a decade, through the oceans commissions, H.R. 21, its predecessor legislation, and now NOP. Our goal all along has been to preserve and strengthen the system of regional, stakeholder-driven fishery management that has worked so well in our part of the country. Even after all our attempts to participate, the Draft Implementation Plan ignores the points we have made and proposes the creation of a new ocean resource

management system that appears to have few limits. Page 9 of the report states that “fisheries can be better managed” and that NOP “will improve future management decisions.” Our question is: Decisions made by whom? We suggest that either the Regional Fishery Management Council process be exempted from this entire program or that the NOP/CMSP/RPB process be revised so that it genuinely becomes the voluntary planning process we have been told it was intended to be.

The Nine Priority Objectives

The bulk of the Draft Implementation Plan describes specific actions the Administration intends to take to achieve the nine priority objectives. There are numerous milestones and deadlines for each. We will not take the time to go through the scores of actions and milestones laid out in the plan. However, we will highlight some which we believe are overly ambitious/costly or which seem to lead to the inescapable conclusion that NOP is more of a regulatory program as opposed to the transparent, collegial planning process we keep hearing about.

Overly Ambitious Action Proposals (target date)

Page 19 --- Explore “the 95-percent of the ocean that remains poorly known.” (2014)

Page 23 --- Enhance ocean education so that “a highly competent workforce is available for U.S. employers.” (2014-2017)

Page 25 --- Assess the environmental knowledge of middle school students. (2017)

Page 27 --- Develop and deploy within ten years a fleet of unmanned air, sea surface and underwater research systems. (2022)

Page 32 --- Map the entire EEZ and continental shelf. (2017)

Page 50 --- Address “planned and unplanned activities impacting coral reef ecosystems.” (2012)

Page 56 --- “Integrate relevant socioeconomic monitoring information with ecosystem monitoring information to understand changes in coupled human-natural systems in selected areas.” (2013) [Perhaps this would be a more appropriate task for academia?]

Page 57-58 --- Conduct research to assess direct and indirect impacts of climate change and ocean acidification on coastal communities, including estimations of mean sea-level rise, impacts on jobs, and effects on marine species. (2013-2015)

Page 65 --- Provide funding to private landowners to help them reduce nutrient and sediment runoff. (2012)

Page 67 --- Reduce air pollutants (sulfur, nitrogen, mercury) to the oceans and Great Lakes. (2012) Control storm-water runoff from the federal highway system. (2015)

Page 74 --- “Protect 2 million acres of lands identified as high conservation priorities” (including 700,000 acres of forest) (2015)

Evidence that NOP is a Regulatory Program

Page 4 --- “CMSP is an important tool for implementing EBM.” It will lead to a more “certain decision-making process for managing activities in the ocean”

Page 6 --- “The NOC expects to complete and approve the final Implementation Plan in the Spring of 2012. Federal agencies will then implement its initial set of actions.”

Page 11 --- “Existing regulatory requirements and programs that were developed based on a fundamentally different model may need to be modified”

Page 12 --- “an EBM approach supports adaptive, iterative management.”

Page 12 --- “various responses or actions may become necessary given the limits of existing regulatory or statutory authority.”

Page 13 --- Find “opportunities to incorporate EBM principles into Federal laws, regulations, and policies”

Page 15 --- “Establish a process for adaptive resource management”

Page 39 --- “Review the interpretation and, as necessary, propose to strengthen content and/or application of Federal legislation.....to incorporate and better support climate change adaptation efforts.”

Page 51- 52 --- The Plan proposes to identify “important marine areas for management or protection”. This includes use of “national marine sanctuaries, national estuary programs, and national marine monuments.” “Priority species” would be protected using “Essential Fish Habitat (EFH) Provisions including Habitat Areas of Particular Concern (HAPC)”. This passage provides some of the strongest and clearest language that RPB’s, comprised principally of federal officials with no expertise in fisheries management, will develop CMS Plans that usurp the responsibilities of regional fishery management councils. Contrary to the stated intent of the NOP, the Plan creates confusion and ambiguity on EFH and HAPC responsibilities, as well as other areas of fishery management authorities, where none now exists.

Pages 85 – 92 --- This section discusses Coastal and Marine Spatial Planning and the role of the Regional Planning Bodies. It lays out a detailed process for creation of the nine Regional Planning Bodies, implementation of CMSP, creation of CMS Plans for

each region, and the presentation of these plans to the National Ocean Council for certification. This is to be accomplished by 2019.

One of the stated goals of CMSP is empowering coastal communities through a public planning process to make decisions about activities in their regions. This sounds fine until you realize that the membership of the RPB's consists entirely of government officials, dominated by Federal representatives. The document states that "Members will be of an appropriate level of responsibility within their respective governing body to be able to make decisions and commitments throughout the process." This sounds less like planning and more like regulation to us. The system is then removed even further from public/local control by the fact that once the RPB's have developed their CMS Plans, these plans are submitted to the National Ocean Council (a group of 27 Federal officials). This Federal entity then decides if the plan is worthy of "certification". Our presumption is that the next step would be implementation of the plan through new or modified federal regulations. Otherwise, what would be the point of the exercise? We make this statement despite the following discussion that appears on Page 109 of the document (the "Summary of Public Comments" section).

Public Comment: "The Administration should clarify that it will not be the purpose of the Regional Planning Bodies to override the duties of regional fishery management councils."

Response: "The Executive Order expressly provides that Federal agencies will implement NOC-certified CMS Plans consistent with existing statutory authority, including the Magnuson-Stevens Act. Regional planning bodies will be established to develop these plans. They do not have any legal authority or mandate that would override the statutory or regulatory duties of any existing entity, including Regional Fishery Management Councils."

We understand that the Regional Planning Bodies do not have independent legal/regulatory authority. The point is that the CMS Plans they create then go to the NOC for approval and implementation by every agency throughout the federal government. This process is clearly stated in the "Final Recommendations of the Interagency Ocean Policy Task Force" (July 19, 2010...page 65) ---

"Agencies would incorporate components of the CMS Plan into their respective regulations to the extent possible. Adherence with CMSP would be achieved through Federal and State agencies and tribal authorities incorporating CMS Plans into their pre-planning, planning, and permitting processes, to the extent consistent with existing laws and regulations. The CMS Plan signatories would periodically review these processes and where legal constraints are identified, would seek to remedy these constraints, including by working with the NOC to evaluate whether a legislative solution or changes to regulations are necessary or appropriate."

This clearly states that CMS Plans will be implemented government-wide, and that if new regulations are required to achieve the goals of the NOC, they will be pursued. We are not comforted by the boilerplate language about the process being “consistent with existing laws and regulations”. If an agency implements the NOP/CMSP plans in a way which, in our view, conflicts with an existing law or regulation, our only option would be to go to court. As the Administration is aware, few entities have the resources to file court challenges on a regular basis. All ocean user groups, not just the seafood industry, would have little chance of preventing the imposition of CMS Plan regulations.

As we said earlier, we would prefer that the Regional Fishery Management Council process be exempted from this program. If not, then we request that the final NOP Implementation Plan categorically state that nothing in the plan will lead to either new or modified Federal regulations. If this is a collegial, voluntary planning process, as we have repeatedly been told, we are happy to participate. If this is a new Federal bureaucracy whose aim is to regulate virtually all ocean activities, then we prefer to opt out until such time as Congress has provided specific authorization for such a program.

Thank you for the opportunity to once again comment on development of the NOP/NOC/CMSP/RPB program.

February 27, 2012

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

OFFICE OF THE COMMISSIONER

SEAN PARNELL, GOVERNOR
Cora Campbell, Commissioner

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March 2, 2012

National Ocean Council
722 Jackson Place, N.W.
Washington, DC 20503

Re: State of Alaska Comments on the National Ocean Policy Draft Implementation Plan

Dear Council:

The National Ocean Council (NOC) released a draft National Ocean Policy Implementation Plan for public comment on January 12, 2012. The NOC requested comments by March 28, 2012. The following comments represent the views of the State of Alaska on the plan. They are consistent with, and intended to supplement, previous comments the state has provided on the National Ocean Policy, Coastal and Marine Spatial Planning (CMSP), and the nine priority objective Strategic Action Plans. We encourage you to revisit the state's previous comments for more detailed discussion on many of the issues raised here.

Alaska is dedicated to the continued health and productivity of its coastal and marine resources. We rely on these areas for commercial, sport, and subsistence fisheries, recreation, transportation, abundant development opportunities (such as offshore oil and gas and renewable energy), shipping, tourism, and a multitude of other uses. Thus, any major proposed policy change related to the oceans has our full attention.

The Administration's National Ocean Policy and CMSP propose to establish a new federal framework for management of the oceans. Alaska's coastal and marine resources and their uses are already regulated by a diverse array of federal, state, and local authorities. This existing oversight has a proven track record and is fully capable of ensuring the long-term health and viability of Alaska's coastal and marine resources. The drivers that have been cited for CMSP in the lower-48 are largely absent in Alaska. For these reasons, we continue to question the need for applying this new governance framework in the Alaska region.

The state notes several improvements in the implementation plan over previous strategic action plan documents. For many of the objectives, problematic language has been removed and greater emphasis has been appropriately placed on identifying data gaps and the means for closing those gaps.

The state, however, identifies four broad issues of concern with the document:

1. *State Authority*: There is no recognition of state authority for state waters or trust resources. The plan must recognize the sovereign jurisdictions of states over their marine and coastal waters and trust resources.
2. *Theme of Protectionism*: A concept of protectionism pervades the plan. The term “protect” implies non-use, and should globally be replaced with “conserve,” which suggests multiple-use.
3. *Planning Effort Time Frames*: No time frame is provided for the planning effort. It is unclear whether the focus is on near and short term outlooks (0-10 years), medium outlooks (10-25 years), or longer term outlooks (beyond 25 years). We question focusing on longer term outlooks, as they are highly speculative. Instead, we recommend remaining focused on near and medium term outlooks, which are more predictable.
4. *Diversion of Funds*: The Draft Implementation Plan clearly underscores concerns regarding the diversion of existing resources to accomplish the goals of the Plan. We request that implementation of this plan not come at the expense of ongoing, mission critical activities of National Oceanic and Atmospheric Administration and other agencies as they pertain to research and management of our marine and coastal resources.

Furthermore, we continue to identify a number of more specific concerns with the Coastal and Marine Spatial Planning and Ecosystem Based Management (EBM) objectives of the implementation plan. We also have concerns about how the expertise and authority of the North Pacific Fishery Management Council will be incorporated into the CMSP process. These concerns are more fully discussed in the attached document.

Sincerely,



Cora Campbell
Commissioner

cc: The Honorable Don Young, Congressman, U.S. House of Representatives
The Honorable Mark Begich, Senator, U.S. Senate
The Honorable Lisa Murkowski, Senator, U.S. Senate
Kip Knudson, Director of State and Federal Relations, State of Alaska
The Honorable Dan Sullivan, Commissioner, Department of Natural Resources, State of Alaska
The Honorable Larry Hartig, Commissioner, Department of Environmental Conservation, State of Alaska
The Honorable Michael Geraghty, Attorney General, State of Alaska
Doug Vincent-Lang, Acting Director, Department of Fish and Game, State of Alaska
Mark Robbins, Associate Director, Office of Governor Sean Parnell, State of Alaska

**State of Alaska's Comments on the National Ocean Council's Draft
National Ocean Policy Implementation Plan**

Coastal and Marine Spatial Planning (p. 85)

General Comments:

Among the National Ocean Policy's components, Coastal and Marine Spatial Planning (CMSP) continues to cause us the most significant concerns. We have repeatedly communicated a host of concerns related to CMSP. Despite the submission of detailed written comments and numerous conversations with Administration officials, these concerns persist. They include the following:

- *Ocean Zoning:* Despite claims to the contrary from Administration officials, CMSP appears to represent ocean zoning. We have questioned the practicality of ocean zoning given that fish migrate and the locations of oil and gas reserves have yet to be discovered. The State of Alaska has also questioned the additional restrictions that could result from this exercise.
- *Top-down Approach:* We have expressed concern that the framework for CMSP has a rigid top-down orientation, without flexibility to allow for regional differences. The Final Recommendations of the Interagency Ocean Policy Task Force, which were incorporated within Executive Order 13547, outlined this top-down design. We now understand the federal agencies have little, if any, flexibility to depart from the recommendations in implementing CMSP.
- *Use of Existing Federal Authorities:* We have been told that CMSP plans would not be regulatory. However, we remain concerned that by requiring agencies to integrate their actions into CMS Plans, CMSP will constrain and distort the exercise of existing regulatory authority.
- *Marine Protected Areas:* CMSP could lead to the creation of new marine protected areas, when adequate protections in Alaska are already in place.
- *Federal Preemption:* We are concerned the current administration or future administrations may attempt to use the framework of CMSP to supersede Alaska's authority over waters and upland areas that are under state jurisdiction. Federal officials dispute this claim, but the final recommendations clearly describe a geographic scope for CMSP that includes these areas (see page 49 of the final recommendations).
- *Federally Dominated Decision-making Process:* Despite the participation of states, tribes, and other interests in RPBs, ultimate CMSP decision-making authority lies with the federal government (see page 54 of the final recommendations). We oppose a dispute resolution process that gives the federal government ultimate decision-making authority over issues involving state jurisdiction.

- *Precautionary Principle and Ecosystem Based Management:* The precautionary principle and ecosystem based principles, which are cited in the final recommendations, could be applied through CMSP to unnecessarily restrict or postpone economic activity.
- *Regional Fishery Management Councils:* We are concerned about the diminished role of regional fishery management councils, which are essential to U.S. fishery management. Recently, the Administration agreed to provide one seat on each RPB for a government regional fishery management council representative. We do not believe this, in itself, equates to meaningful consultation with the councils.
- *Lack of Congressional Authorization:* Instead of citing specific statutory authority for CMSP, the Executive Order cites numerous statutes that relate to the oceans, and claim them as authority. Congress has not approved CMSP activities or funding for CMSP.¹ Thus, the statutory authority to implement these actions remains in question, and significant questions remain about whether Congress will appropriate funding for CMSP in the future.
- *Funding for other Priorities:* Without a clear funding strategy for CMSP, funding may be diverted from core federal activities in Alaska, such as fishery stock assessments, to support CMSP. In addition, we are concerned that CMSP will divert the attention of federal personnel away from consultation, review and comment on permitting for development projects and programs of importance to the state.
- *Tool for Litigation:* With vague and undefined objectives, goals, and policies, CMSP could result in lawsuits to stop or delay federally-permitted activities.
- *Regulatory Uncertainty:* The new quasi-regulatory layer of CMSP could create an uncertain regulatory climate, which will then have a chilling effect on responsible economic activity and job creation. We understand that CMSP will take years to fully implement. During the process, we fear it will create reluctance on the part of federal agencies to proceed with permitting for major development projects until CMSP is functional.
- *ESA & NEPA:* Since a major CMSP decision could be considered an action that requires consultation under the Endangered Species Act (ESA) and a federal activity under National Environmental Policy Act (NEPA) it is not entirely clear how these processes will interact with each other. Given the tiered lease sale process engaged in by the Bureau of Ocean Energy Management, there may be difficulties in determining the proper time for engaging in ESA consultation. The criteria for determining whether a decision is ripe for review is set out in *Center for Biological Diversity v. U.S. Department of Interior* (563 F.3d U.S. Department of Interior (563 F.3d 466 (D.C. Circuit, 2009)).

¹ It should be noted that both Norway and the United Kingdom enacted their marine spatial planning efforts through legislation rather than administrative action.

The State has called for amendments to NOC documents, and where appropriate Executive Order 13547, to address these issues. The Administration's reluctance to consider these recommendations raises doubts about assurances to provide flexibility in establishing an RPB in Alaska and other regions.

In past comments, the State has called for more specificity in describing the CMSP process and the intent of the effort. As the National Ocean Council looks to move forward with an RPB in Alaska, it would be helpful if the NOC were to provide a list of issues involving the waters off Alaska where CMSP could assist federal action. This would help the state understand the NOC's objectives with respect to the Alaska region.

Specific Comments:

- *National objectives introductory section (p. 87):* The plan indicates that regional planning bodies will have "maximum flexibility in developing regional objectives." We believe this flexibility should include the option of foregoing the establishment of a CMS Plan in order to focus on other areas or to develop CMS plans that exclude state waters and upland areas, if the RPB so chooses.
- *Objective 1 (p. 88):* The plan describes how the CMSP process can reduce delays. We agree that coordination among federal agencies is important, but emphasize that certain agencies were given certain missions by Congress. Creating a process that allows one or more agencies to block the activities of another, with statutory authority in that area, would violate the will of Congress. Furthermore, this objective could result in the side-boarding of existing or future uses on state waters and/or trust authorities.
- *Objective 2 (p. 88-89):* The plan describes the identification and definition of sensitive areas. As mentioned above, the state opposes the establishment of new marine protected areas in the region.
- *Action 1:* This action describes the development of a Handbook on Regional Coastal and Marine Spatial Planning. It is unclear whether this document will impose new rules or restrictions on RPBs. Furthermore, it is unclear what the process will be for developing the handbook, what opportunities there will be for comment, and whether the Governance Coordinating Committee will review and approve the handbook before release.
- *Action 2:* Without federal appropriations for CMSP, it is unclear where the federal government will find the funding to convene regional workshops and exercises described in Action 2.
- *Action 5:* Again, the state believes the regions should have the flexibility to forego developing CMS plans if RPBs prefer to focus on other areas. Furthermore, this action calls for "certification" of developed regional plans by the National Ocean Council. Details are not provided on the criteria that will be used to certify these plans. It should be possible for regional plans to depart, even substantially, from the requirements of the final recommendations and the NOC's model charter. Without this latitude, we question whether "maximum flexibility" could be achieved.

Ecosystem-based Management (p. 9)

General comments:

As stated previously, Alaska supports, and already manages state waters and coastal regions using an ecosystem approach. However, the state continues to have concerns with adopting ecosystem-based management guidelines at the federal or international level. State-level management is the best approach. We also oppose mandating "precautionary approaches" or "precautionary principles" that dictate worst-case assumptions when faced with scientific uncertainty. These terms are misleading and should not be confused with the careful and conservative abundance-based management used in Alaska. We support approaches that deal with scientific uncertainty by adopting reasonably conservative assumptions.

Specific comments:

We find several of the milestones listed for this priority objective to be problematic. They are described below:

- *Action 1, milestones bullet 3 (p. 13):* This milestone calls for completion of a review of EBM-relevant statutes and regulations for the purpose of incorporating "EBM principles into Federal laws, regulations, and policies" and "potential legislative changes that would fill gaps and support implementation of EBM." We have been assured that the National Ocean Policy is not intended to be legislative or regulatory. This milestone, however, clearly borders on crossing into legislative and regulatory areas. We recommend removing this milestone.
- *Action 1, milestones bullet 5 (p. 14):* This milestone calls for the development of "guidance for all federal agencies about how to implement EBM under existing regulatory and legislative authorities." We fear this effort will constrain and distort the exercise of existing regulatory authority. Furthermore, it could be used to sideboard existing or future uses of state waters and/or trust resources. We recommend removing this milestone.
- *Action 2, milestone bullet 2 (p. 15):* This milestone calls for phasing EBM principles and goals into the federal process for awarding future grants related to the oceans, coasts, and Great Lakes. Again, we fear this milestone could be used to sideboard existing or future uses of state waters and or/trust resources. We recommend removing this milestone.
- *Action 2, milestone bullet 4 (p. 15):* This milestone calls for the development of "national guidelines and best practices for EBM implementation." Once again, we fear this milestone could be used to sideboard existing or future uses of state waters and or/trust resources. We recommend removing this milestone.
- *Action 4, milestones 1 & 3 (p. 17):* We believe that support from affected states within a given region should be an essential factor in identifying priority geographic areas for pilot implementation of EBM.

Role of the North Pacific Fishery Management Council in the CMSP Process

While the Draft Plan is silent on the specific consultation role with the Councils, we do understand and appreciate the NOC's recently stated intent to include a Council representative on each of the regional planning bodies. We also understand and appreciate the intent to develop technical committees to support the regional planning bodies, which could provide additional opportunities for inclusion of Council perspectives. However, the State is concerned with the limitation that the Council representative on the regional planning bodies must be a Council member who is also a governmental representative – not only does this greatly constrain the Council's choice of its representative on the regional planning body, it also may create the perception that such a representative is not so much a Council representative as an additional State or Federal agency representative. We believe that the NOC should re-evaluate this determination, and be more explicit in the Implementation Plan regarding the Councils' role in the CMSP process.

Regarding the Councils' role in the CMSP process, we also believe that, in addition to a single (somewhat constrained) seat on the regional planning body, there should be an explicit mechanism for formal, body-to-body consultation. In other words, the Councils should be recognized not only through participation in the regional planning bodies, but also recognized in a broader sense through some type of consultation process that allows the Councils as a regulatory body, in their capacity as Executive Agencies of the Department of Commerce, to review and provide input on recommendations of the regional planning bodies. We believe this to be an important consultation mechanism that is not addressed by inclusion of a single Council member on the regional planning body.



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April 27, 2011

National Ocean Council
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Submitted electronically via:

<http://www.WhiteHouse.gov/administration/eop/oceans/comment>

United Fishermen of Alaska (UFA) represents 38 commercial fishing organizations participating in fisheries throughout the Alaska and its offshore federal waters. Altogether these fisheries represent more than half of U.S. domestic seafood harvest, and are the economic lifeblood to hundreds of communities, many of which lack other employment opportunities. UFA member groups have a long history of active involvement in the North Pacific Fishery Management Council, and UFA as an umbrella association holds a high level of respect for the Council process regarding fisheries and activities in the Exclusive Economic Zone, and for the State of Alaska for activities in state waters. We support the perspective of the Council Coordinating Committee, the State of Alaska on new federal ocean policy and the US Senate Commerce Committee letter of March 1, 2010, notably signed by Senators Mark Begich and Maria Cantwell.

We appreciate the opportunity to provide comment on the Strategic Action Plans for the National Policy for the Stewardship of the Ocean, Our Coasts, and the Great Lakes. We appreciate that you have provided three guidance questions on the nine identified priorities. Most of our concerns are not addressed within the framework of the questions, but fundamental to National Ocean Policy and the Coastal and Marine Spatial Planning (CMSP) program. Thus we offer the following comments based on our need to maintain an efficient fisheries management framework, that includes cooperation with federal and state agencies that oversee not only fisheries but maritime transportation, research, and OCS exploration activities.

Alaska stands out as the sole state under jurisdiction of the North Pacific Fishery Management Council (NPFMC), while every other regional fishery management council includes the federal waters of more than one state or territory. With over 44,000 miles of coastline, Alaska has more coastline than the other eight management regions combined. The federal waters off Alaska, as well as state waters remain healthy and productive. We do not feel we have the same problems that may exist in the rest of the United States that are the impetus behind the Ocean Policy Council, and we feel that the current management process through the NPFMC is not likely to be improved upon through an overarching centralized authority from outside our region. We are concerned that the

Ocean Policy Council has not adequately defined the problems the administration is attempting to address and we question whether these are relevant problems in Alaska.

The fishing industry operates with an expansive variety of vessel types, target species, home port communities, and related industry sectors. Ultimately, most of these operations are small, entrepreneurial family businesses, with long term capital investment. Alaska's fishing fleets have successfully established models for sustainable fishing practices, with long term goals and scientifically established harvest constraints overriding short term profit-based decisions. In Alaska's offshore waters there are already huge areas that are excluded from some or all fishing practices, and these closures have been the result of the NPFMC process and are accepted by fishing fleets. The financial wellbeing of these small family fishing businesses is a very delicate balance, including interrelationships of fisheries with processing, transportation, energy, and financial sectors, but ultimately the small businesses are dependent first and foremost on access to a harvestable abundance of finfish and shellfish stocks. We would like the Ocean Policy group to recognize the national interest in recognizing the oceans as a storehouse of sustainable food for the world, and the national interest in maintaining viable commercial fishing fleets in coastal communities. We ask that you not take measures that would reduce our access to harvestable fish stocks, except through the NPFMC.

United Fishermen of Alaska priority recommendations:

1. Costs to agencies and to the public, in time and money.

The goal of coordinating research and data to provide access to agencies and the public is commendable and appropriate. However, given the concerns of the federal budget, we ask for assurance that NOAA's budget not be diverted from ongoing scientific research needs that are essential to sustainable fisheries.

We caution that new regulatory bodies and processes bring considerable expense in time and money to affected agencies and to the public stakeholders, adding additional overhead costs to fishing operations that take part in the process. Considering the amount of time that fishermen spend to participate in existing processes, we are not eager to participate in new overarching bodies and processes without a clear objective or stated problem to be addressed.

2. Access to productive ocean and coastal waters.

Fishing businesses require access to harvestable fisheries stocks. Oceans are a dynamic environment, subject to constant change, and ocean life in any particular area cannot be expected to remain static. Other areas of the United States may have situations of competing user groups, or conservation needs that would require zoning for allowable uses, but we do not feel this to be the case in the coastal or federal waters off Alaska's shores. We feel that the ability of Alaska's commercial fishing fleets to operate compatibly with energy production has been important to the survivability of fleets in Cook Inlet where active energy development has occurred. We ask that the EEZ offshore from Alaska be specifically excluded from specific designations under CMSP. We concur with the April 21 letter of Alaska Senator Mark Begich to Dr. Lubchenco, asking "that you not expend taxpayer funds for CSMP in Alaska this year", and his suggestion that

you “use savings from keeping Alaska out of this program to increase your investment in fisheries stock assessments in Alaska waters.”

3. Local Empowerment.

We strongly support local and regional empowerment, and a public stakeholder-based process in oceans policy and management. While we respect the understanding of the National Ocean Council that offshore uses may have an impact on coastal and adjacent land, we note that the State of Alaska is the appropriate management authority for Alaska’s lands and state waters. With no limiting barrier between state and federal waters, the health of fisheries requires a coordinated approach between state and federal regulators. We feel this is functioning well in Alaska through state representation on the NPFMC, and regular coordination and communication between the NPFMC and the Alaska Board of Fisheries.

UFA holds a high degree of confidence in the North Pacific Fishery Management Council (NPFMC) as the public body best equipped to assess and direct fishing and related activities in the federal waters, and feel that the NPFMC is well equipped to coordinate with the State of Alaska on matters within the State’s jurisdiction. We urge caution and restraint in overarching policy-making or CSMP based on distant rather than locally involved perspectives.

4. Regional Planning Bodies – representation for commercial fishing stakeholders

The CSMP process calls for Regional Planning Bodies (RPB), and includes Alaska as a single region. Yet Alaska’s 44,000 + mile of coastline and our own regions, the Alaska RPB would need to address an overwhelming scope of information and data. The RPBs are proposed to have a Federal, tribal, and State Co-lead, as well as individual Federal, tribal and State RPB members. We are concerned that the inclusion of commercial fishing organizations is not explicit. The Ocean Policy Council should spell out the intentions for composition of the RPBs, to specifically include commercial fishing stakeholder representation, and should specify the process for appointments.

5. Regional Citizens Advisory Councils (RCAC), such as those established in Alaska under the Oil Pollution Act of 1990, should be established in all areas where production or transportation of potential ocean pollutants occurs. We feel that healthy and successful commercial fleets are the best “tool in the toolbox” for containment and cleanup exercises. Local fleets can provide vessels that are capable in design with operators that are most familiar with the local waters, currents, and conditions. So rather than “fence off” areas for development, we suggest enabling access by local fleets, and providing opportunities for fishing fleets to be developed if not already established in areas such as the Arctic that may see future offshore resource development or new shipping activity.

We reiterate the recommendation of the Presidential Panel from the Deepwater Horizon oil spill calling for RCACs as one meaningful act that the National Ocean Policy Council should enact.

In summary, we ask that the National Ocean Council carefully consider the underlying need for the CSMP in relation to Alaska’s size, scope, distance, and current health of our oceans. The comprehensive public Council process is currently working well to help us

provide sustainable seafood to the U.S. and employment opportunities in remote and coastal communities, as well as the 48 other U.S. states with residents who hold Alaska commercial fishing permits.

Thank you for your consideration.

Sincerely,



Mark Vinsel
Executive Director

CC:

Honorable Mark Begich, United States Senate
Honorable Lisa Murkowski, United States Senate
Honorable Don Young, U.S. House of Representatives
Mark Robbins, Office of the Governor of Alaska
Cora Campbell, Commissioner of the Alaska Department of Fish and Game

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • 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 • Aleutian Pribilof Islands Community Development 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
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