



UNITED FISHERMEN OF ALASKA

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February 27, 2013

Chairman Karl Johnstone
Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811

RE: Criteria for Board Generated proposals – RC 101 from AYK meeting

Dear Chairman Johnstone and Board of Fisheries Members,

The United Fishermen of Alaska (UFA) Board of Directors met last week and discussed the criteria for board-generated proposals developed by ADFG and adopted for use by the Board of Fisheries at its AYK meeting in January (RC-101), and offer the following comments:

We appreciate the development of criteria for board-generated proposals. This is a good starting point but we recommend that the Board use this as a working draft solicit comments at all board meetings, revising the policy as the Board receives feedback and adopt a final policy at the Statewide Board meeting in three years.

UFA recommends the following revision to the policy be implemented immediately:

1. In criteria #1, remove “allocation concerns” among the specific examples of considerations of the “public’s best interest”. We believe that a proposal that is mostly allocation is never appropriate for consideration out of cycle.
2. We recommend an additional criteria that a board-generated proposal cannot be generated as a substitute for an ACR proposal that was denied, or no action taken, or a late proposal identified by Dept of Law during a work session.

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. We appreciate your consideration of these recommendations, please let us know if you have any questions.

Sincerely,

Julianne Curry
Executive Director