



# UNITED FISHERMEN OF ALASKA

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ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
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## **RE: Upper Cook Inlet Board of Fisheries Proposals**

Dear Chairman Morris and Board of Fisheries members,

United Fishermen of Alaska (UFA) represents 37 Alaska commercial fishing organizations, participating in fisheries throughout the state and its offshore waters. At our October 2007 board meeting the UFA Board confirmed the fishing community's support for use of the best available scientific management measures to achieve and maintain optimum sustainable fishery resources. UFA feels strongly that the health and optimum sustainability of Alaska's fishery resources results from the use of the science based tools that have been developed as part of Alaska's fishery management. The use of these tools should not be jeopardized through restrictions on the management authority of the Department of Fish and Game. In support of our commitment to healthy and optimum sustainable fisheries management, which promotes healthy commercial fishing communities, the UFA Board adopted the following principles for salmon fisheries management, and submits these positions as comment on Upper Cook Inlet proposals:

### **UFA strongly supports:**

- Escapement goal management based on proven biological principles. Optimum sustainable salmon fisheries should be managed with the prime objective to provide escapements that are within scientifically established upper and lower **biological escapement goals**.
- Adaptive and abundance based management through the local area managers.
- The unencumbered use of the Commissioner's EO authority for fishery management. This is integral to the successful management of a sustainable resource and should not be limited or curtailed within any salmon management plan.
- Mixed stock management is a complex task in any salmon management plan. The Board of Fisheries and the Department of Fish and Game are responsible for

achieving the long-term optimum sustainability of our salmon resources, while protecting commercial fishing communities.

**In accordance with these principles, UFA strongly opposes all arbitrary restrictions and actions that unduly and improperly limit the State's fishery managers from achieving biological escapement goals.** We especially object to closed "window" periods within normal fishery seasons; they deny managers the necessary flexibility to make real time fishery management decisions, leading to lost yield and overescapement.

Additionally, season opening and closing dates must be flexible and allow fishery managers to achieve the optimum yield from the resource. Mandatory opening and closing dates are arbitrary, without scientific basis, and contribute to overescapement and lost yield; therefore, mandatory season opening and closing dates should be carefully scrutinized to ensure that biology and not politics open or close a fishery. UFA strongly opposes arbitrary season opening and closing dates.

We ask that you carefully consider all the proposals before you, and reject those that interfere with the Department of Fish and Game's ability and flexibility in managing fisheries sustainably.

Thank you for your consideration of our position,



Mark Vinsel  
Executive Director

#### UFA MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Draggers Association • Alaska Independent Tendermen's Association • Alaska Longline Fishermen's Association  
Alaska Scallop Association • Alaska Shellfish Association • Alaska Trollers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve  
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 • Sitka Herring Association • Southeast Alaska Fisherman's Alliance  
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners Association • Southern Southeast Regional Aquaculture Association  
United Catcher Boats • United Cook Inlet Drift Association • United Salmon Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association • Western Gulf of Alaska Fishermen