February 1, 2013

Representative Paul Seaton, Chairman
House Special Committee on Fisheries
Alaska State Legislature
State Capitol, 120 Fourth Street
Juneau, AK 99801-1182

RE: HB 18 PERSONAL USE PRIORITY, OPPOSE

Dear Chairman Seaton and Committee Members,

United Fishermen of Alaska (UFA) represents 34 Alaska Commercial fishing organizations, and hundreds of individual fishermen and related businesses.

Fisheries management in Alaska is renowned throughout the world for its emphasis on sustainability. While most of the world long ago lost their historic runs of wild salmon, Alaska shows a remarkable history of restoring salmon runs throughout the state, after a long period of decline during the period before Alaska gained statehood.

Among the most important tools that have helped Alaska restore and retain healthy salmon populations are the Board of Fisheries process by which allocative actions are made on a case by case basis based on science and public input, and real time management by the Department of Fish and Game based on scientifically established escapement goal ranges.

Alaska's constitutional mandate to manage fisheries for the maximum benefit of its citizens requires careful consideration of the range of benefits that fisheries provide, including nutritional needs, history and usage by residents and non residents, importance to the economy of the state, region and local area, and recreational opportunity. These factors are considered for each regulatory proposal in the deliberative process of the Board of Fisheries, as well as management decisions of the Department of Fish and Game.

We strongly caution against creating a priority for personal use fisheries, because it will shift allocation and opportunity away from commercial fisheries that provide income to state and local governments, to fisheries that do not. It also would increase the perception of "entitlement" by Alaska residents to fisheries resources that are limited by nature.

Commercial fishing provides the majority of the public with access to the resource.

Personal use fisheries are open to all Alaska residents, with only the requirement to hold a resident sport fishing license. As the population grows in one area of the state, the perceived entitlement to fisheries resources in other areas of the state that have established personal use fisheries pits one region against another.
The intent by the Board of Fisheries in establishing Personal Use fisheries is clear in 5 AAC 77.001 (4) (b): "...allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest." Since that time in 1981, we see extreme population growth primarily in one area of the state, and we can expect this to continue. We currently have 95 personal use fisheries that have been established throughout the state that are open to all residents. If HB 18 were to pass and establish a priority for the Personal Use fisheries over other uses (besides Subsistence), the growth of one region of the state will have detrimental impacts on other regions and historical patterns of use.

We are also concerned that such a priority would handcuff the Board of Fisheries and Department of Fish and Game in the ability to allocate and manage fisheries, and leave many allocative and management decisions open to lawsuit based on a perception of interference with a Personal Use fishery.

If Alaska is going to avoid the decline of salmon runs as has occurred elsewhere, we need to avoid the pattern of fighting over the fish, pitting one region or user group against another, while industrial development and population eliminate one stream or run at a time until the fish are gone.

We strongly urge this committee, and the Alaska State Legislature, to leave the prioritization of fishery allocations within the Board of Fisheries, and the management within the Department of Fish and Game.

Sincerely,

[Signature]

Julianne Curry
Executive Director

**MEMBER ORGANIZATIONS**

Alaska Bering Sea Crabbers • 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 • Cape Barnabas Inc. • Concerned Area “M” Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • 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