January 18, 2008

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

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