



UNITED FISHERMEN OF ALASKA

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March 5, 2019

Alaska Board of Fisheries & Alaska Board of Game
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

**Re: Opposition to Proposals 28 & 29
Support for Proposal 33**

Dear Alaska Board of Fisheries and Alaska Board of Game Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

Opposition to Proposals 28 & 29

United Fishermen of Alaska oppose Joint Board Proposals 28 & 29 which would allow for an advisory committee representative to be at the board table during deliberations. Advisory Committee members are already allowed 10 minutes to testify in front of the Board of Fisheries and 15 minutes in front of the Board of Game compared to the three and five minutes allotted for members of the public. Regulation **96.440 Board Assistance**, states that the "boards will provide information regarding board meetings to committees so that committees may plan maximum participation in the board's deliberations. In addition, a board may request a committee to meet and to formulate recommendations on a subject or issue identified by the board."

We do not believe these two proposals are necessary for the boards to carry out successful deliberations. There is ample time provided for advisory committee members to share their regional expertise during public testimony, committee of the whole, and with one-on-one communication with board members.

Support for Proposal 33

We support in concept Proposal 33 which seeks to amend the Joint Board's procedure for establishing Fish and Game regulations. In recent years, Board Generated Proposals have become a "catch-all" for proposals submitted out of cycle or after the deadline, and for emergency petitions that don't meet the emergency petition criteria.

The creation of Board Generated Proposals greatly inhibits public process, which is one of the greatest aspects of the Board of Fish and the Board of Game. When boards are allowed to

create a Board Generated Proposal on the spot, without public notice, it creates distrust in the process which is built on transparency.

The rise in Board Generated Proposals has also created a financial burden on members of the public who now find they need to frequent meetings that are not within their normal meeting cycle because they need to be present in case the board drops a new proposal that affects their region or livelihood.

By amending the procedure for how regulations are developed within the board, public trust and transparency will be re-established.

Thank you for the opportunity to submit these comments.

Sincerely,



Matt Alward
President



Frances H. Leach
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association
Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners 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 Cook Inlet Drift Association • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association