



# UNITED FISHERMEN OF ALASKA

**Mailing Address:** PO Box 20229, Juneau AK 99802-0229

**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801

**Phone:** (907) 586-2820 **Fax:** (907) 463-2545

**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

February 19, 2019

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

## **Re: Opposition to Proposal 171**

Dear Chairman Morisky and the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) opposes Proposal 171, which modifies the criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries in non-subsistence areas.

UFA is opposed to arbitrary ranking of the proposed allocation criteria, which inherently favor, by regulation, any individual gear group(s) in nonsubsistence areas. In current regulation there is an expectation that the board will hear the public and make an informed decision that will be guided by statute.

This proposal is in conflict with 5 AAC 77.001(b) 'that taking...does not negatively impact an existing resource use.' This proposal has far-reaching consequences and could significantly alter and negatively impact how fisheries around the state are allocated and managed.

In addition, this proposal introduces and defines "Adaptive Management." It is not clear what the adaptive management process would be based on and when the re-evaluation process would happen. The proposal specifically mentions "current condition and needs" but does not provide any further guidance. Guidelines found in AS16.05.251 provide guidance and include the term "may" which allows for board's discretion to weigh the importance of each factor. This allows the board to assess each of the considerations equally while the proposed language appears to take away that flexibility.

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.

Sincerely,

Matt Alward  
President

Frances H. Leach  
Executive Director