

# UNITED FISHERMEN OF ALASKA



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October 8, 2013

Karl Johnstone, Chair  
 Alaska Board of Fisheries  
 Boards Support Section  
 PO Box 115526  
 Juneau, AK 99811-5526

**RE: Board of Fisheries Agenda Change Request Proposal Comments**

Dear Chairman Johnstone,

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. UFA appreciates the opportunity to comment on the following ACR proposals:

**ACR 5: "Eliminate all other consumptive uses of the Sitka Sound herring stock in order to provide reasonable subsistence opportunity." UFA OPPOSES ACR 5** due to all the reasons outlined in our past comments regarding this issue. This proposal also does not meet any of the three required criteria for ACR's.

There is no fishery conservation concern; there is no error in regulation; and there is no effect on a fishery that was unforeseen when current regulations were adopted. UFA considers the proposal to be allocative in expected effects of restricting long established commercial herring fisheries.

The few continuing large scale commercial harvests may be subject to fluctuations in harvest volume due to many factors, but the Sitka Sac roe fishery has been under close scrutiny by the Board of Fisheries and Federal Subsistence processes, and estimates of herring biomass continue to be healthy. The Southeast herring fisheries were discussed extensively during last Board of Fish cycle. The issues that this proposal attempts to address have ramifications across other fisheries, **and are best addressed through the Board's regular cycle.**

**ACR 6: "Establish statewide regulation to allow use of dip net gear in place of commercial gillnet and seine gear for salmon stock conservation purposes." We OPPOSE ACR 6** due to the umbrella-based approach to the proposal. When reviewing regulations regarding gear types and considerations of broad-based changes, these discussions should happen on an area by area basis, a fishery by fishery basis, and **should occur with full participation of the public and affected users through the regular Board cycle within the region.**

As noted in previous comments and testimony, UFA continues to be concerned regarding the use of the ACR process to circumvent the traditional BOF cycle. Consistent with UFA comments regarding Board Generated Proposals, we believe that a proposal that is primarily

allocative is not appropriate for consideration out of cycle. UFA also strongly believes that any proposal that requires sweeping changes to current regulations is best addressed through the full public process.

Thank you for your service to the public through your participation on the Alaska Board of Fisheries, and for your consideration of our input on these proposals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julianne', written in a cursive style.

Julianne Curry  
Executive Director