



UNITED FISHERMEN OF ALASKA

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October 14, 2014

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 & meeting cycle comments

Dear Chairman Johnstone,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 Alaska commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters.

UFA SUPPORTS ACR 27: Modify statewide regulations to provide for the continuation of sport fishing business and guide registration and reporting and vessel registration requirements to be legally consistent with statutory requirements after the repeal of AS 16.40.260 – AS 16.40.299 (5 AAC 75.075; 5 AAC 75.076; 5 AAC 75.077; 5 AAC 75.995). ACR 27 was submitted by ADF&G for consideration at the first available meeting which is the Prince William Sound December 2014 meeting. ACR 27 meets the criteria for consideration outside of the normal cycle due to the Legislature not extending the program in the 2014 session. It is important to the State of Alaska to continue a charter business registration and reporting requirements as adequate harvest data is critical to sustainable fisheries management and is particularly important in regards to the federal management of Pacific halibut. Without adequate harvest data, it is likely that management measures will become more restrictive in order to proactively protect Alaska's fisheries resources.

BOF meeting cycle, request for next Upper Cook Inlet meeting to be held in the Kenai Peninsula. UFA would also like to respectfully request that the next Cook Inlet BOF cycle holds a meeting in the Kenai Peninsula in order to ensure adequate public participation and to diversify meeting locations outside of the Anchorage area.

BOF statute on meeting cycles: AS 16.05.300. Board Meetings.

<http://www.touchngo.com/lglcntr/akstats/Statutes/Title16/Chapter05/Section300.htm>

(a) Each board shall hold at least one meeting a year and as many other meetings as it considers necessary. Each board shall select the time and place in the state for the transaction of business. Each board shall maintain its office at the principal office of the department.

(b) In addition, the Board of Fisheries shall hold at least one meeting or hearing a year in each of the following general areas:

- (1) Upper Yukon - Kuskokwim - Arctic
- (2) Western Alaska (including Kodiak)
- (3) Southcentral
- (4) Prince William Sound (including Yakutat).

As noted in previous comments and testimony, UFA continues to be concerned regarding the use of the ACR process to bypass 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 issues.

Sincerely,



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 • Freezer Longline Coalition • Golden King Crab Coalition • 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