

***Under Sixty Cod Harvesters***

345 Sterling Hwy. Suite 204 Homer, Ak 99603

Alaska Board of Fisheries

C/o Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Opposition to Proposal 171

Dear Chairman Morisky and Members of the Alaska Board of Fisheries,

The Under Sixty Cod Harvesters (USCH) is strongly opposed to proposal 171, "Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries."

USCH represents fishermen harvesting Pacific cod with pot gear on vessels under 60 feet in length in the Bering Sea and Aleutian Islands. Our fleet, which harvests cod in both federal and state fisheries, is also highly engaged in other state water fisheries, including salmon fisheries across the state. USCH has been strongly engaged in the Board of Fisheries process since our organization formed, and commends the Board's leadership on key issues facing Alaska's small boat cod fishermen.

The Board of Fisheries already follows robust criteria for allocative decisions, and uses these guiding principles to approach a complex array of challenging and varied issues. It is the combination of that guidance and public input along with the diverse knowledge base and critical dialogue of the Board itself that shapes this dynamic process. Proposal 171 unnecessarily codifies a prescriptive approach, limiting the Board's flexibility and authority to consider the true complexity of and best approach to each issue.

Additionally, it directly compromises the Board's ability to meet a crucial guideline, the sustainable salmon policy, which states "the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use, consistent with state and federal law." Prioritizing the access and value of one type of fisherman over another prevents the Board from following this and other vital guidelines that ensure our fisheries are diverse and healthy. It harmfully restricts the Board and Alaska's ability to determine and adapt the best possible use of public resources between all its important user groups.

USCH asks that the Board to take no action on Proposal 171.

Thank you,

Brett Veerhusen, USCH Executive Director