

Alannah Hurley Tuesday February 23, 2016

Testimony on Draft Criteria for Proposals Impacted by Coastal Erosion

I'm Alannah Hurley I'm a 4th generation Clark's Point set netter and I submitted a proposal at the Bristol Bay mtg on behalf of Clark's Point set netters that initiated and will be affected by the draft criteria the board is considering for proposals related to climate change. Thank you for handling this quickly and with great consideration.

In regards to the criteria that deserves further scrutiny:

3- Proposal "indicates approval of all affected stakeholders."

This criteria is problematic as it :

- a) It eliminates all potential proposals as there is always a "stakeholder" who can claim negative impacts in regulation change and requiring approval of all the stakeholders is an unrealistic requirement to put on fishermen. While we must outline the potential for both positive and negative impacts to all stakeholders it's the boards job during the process to determine the severity of those impacts and then determine if the solution put forth in the proposal is acceptable to the board, just like any other proposal that comes before the board.

6- "The proposal will not adversely affect those who have historically fished this area."

I agree with BBEDC's comments that this criteria (like criteria 3) would eliminate all proposals seeking solutions .

7- The proposal results in historical fairness.

I also agree with BBEDC's comments that this is the outcome's ultimate goal but shouldn't be a criteria as "fairness" is relative.

While I do agree these types of proposals deserve unique consideration and criteria, the proposers who are seeking relief from the board should not be held to a higher impossible standard of proposal criteria when bringing forth a solution. There needs to be consistency in the broad overall requirements of proposals and not more restrictive requirements for those seeking relief from these issues.

We should have to prove our issue is a result of coastal erosion/accretion and that we are presenting a viable solution, we should then be allowed to engage in the same process just like all other proposals to assist the board in determining if the proposal presents a historically fair solution.

It's important to remember the solutions to these problems are going to come from fishermen and each proposal is going to be unique and should be considered on a case by case basis. These problems our fishermen are facing resulting from climate change create real life struggles and deserve a fair process to find solutions. The boards process and criteria for these issues shouldn't hold our fishermen to an impossible, much higher standard than other proposals (like requiring approval of all stakeholders). Instead please make the suggested changes coming from Bristol Bay to adopt criteria that ensure us a fair process to find solutions to these problems resulting from climate change that aren't going away and are completely out of our control.