



UNITED FISHERMEN OF ALASKA

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May 19, 2016

Glenn Haight, Executive Director
Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526
Email: dfg.bof.comments@alaska.gov

RE: Draft Board of Fisheries Policy on Proposal Review Process

Dear Mr. Haight and Board of Fisheries members,

United Fishermen of Alaska is the statewide commercial fishing trade association, representing 34 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. UFA does not currently have a position supporting or opposing the new policy on the Board of Fisheries draft proposal review process. However, board members have raised several concerns with the new process we would like to bring to your attention.

Department Review

We believe it is appropriate that those proposals submitted after the deadline, with no contact information, and non-responsive to the call, be eliminated to ease the burden of proposals at meetings as currently occurs. We don't see why the Departments of Law and Public Safety would be necessary to consult before eliminating these proposals if they are truly only being sorted out for deadlines and a lack of contact information.

UFA strongly believes that during the department review the department should not eliminate proposals for any other reasons. It is important that the Board of Fish remain a public format and proposals are available to all to consider, not just the Department of Fish and Game.

Committee on Committee Review

It is important that the Board of Fisheries process remain public and transparent. We have concerns with a lack of clarity in the process and criteria the Committee on Committees (CoC) would use in classifying proposals to the consent agenda, which bypasses public comment and open discussion.

Allowing the CoC to determine which proposals are needed for conservation, development, and utilization of a fishery and are routine in nature and uncontroversial for the consent agenda sounds straightforward, but we are concerned that the CoC may underestimate the downstream ramifications of some proposals. Open discussion can provide insight and perspective that might well go missing without discussion. We suggest that there be a process or mechanism by which an individual or organization that submitted a proposal can appeal if they feel they have unjustly lost their voice in the assignment of a proposal to the consent agenda.

Consent Agenda

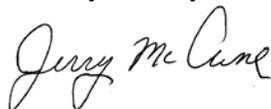
While a consent agenda may be appropriate on a small number of proposals, we are concerned with elimination of open discussion that can help inform the board and the public on a matter before the board. Each proposal should receive deliberation by the board and analysis by ADF&G to ensure the whole board has fully analyzed the potential effects of every proposal. Since a Board member may be specialized in some region, fishery, or user group of the State, we believe deliberations are essential. It helps inform members that do not have first hand experience in the fisheries a proposal addresses. It also helps new board members adjust and learn the history of various policies from board members that have spent more time serving the State. Deliberation of a proposal provides a transparent public process and ultimately provides a public record for the reasoning on the actions taken by the board. We would like to see more definition of the criteria required for proposals to be placed on the consent agenda, so that the public can have confidence that the consent agenda is not seen as limiting public discussion where that may be useful.

Cost Savings

It is unclear to UFA how the proposed policy on proposal review will save money. The process will be a time burden on ADF&G through the department review and Committee on Committee Review. We would like to see the estimated figure in savings and the estimated cost for both reviews of proposals.

UFA also has concerns about outgoing board members making this radical of a change on the Board process when the Governor has made a point that incoming board members would be bringing a change to the Board. The fall work-session may be a better avenue to consider this policy, allowing advisory committees a more likely chance to participate in the process since most AC's are not set up to meet at this time of the year.

Thank you for your consideration.



Jerry McCune
President



Mark Vinsel
Executive Administrator