



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

RC 20
Alward

February 19, 2019

Alaska Board of Fisheries
C/o Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

Re: Opposition to Proposal 171

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

The North Pacific Fisheries Association (NPFA) would like to express our strong opposition to proposal 171, "Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries." NPFA is a multi-gear, multi species commercial fishing organization based in Homer, Alaska. We represent more than sixty family fishing operations utilizing a variety of vessel types. Our members participate in many fisheries throughout Alaska, from Southeast to the Bering Sea, in both state and federal waters. NPFA was founded in 1955 and has been involved with the Alaska Board of Fisheries since its inception. We are very familiar with state management processes, with a long history of engagement with the Board and on local Advisory Committees.

The Board of Fisheries already utilizes thorough and thoughtful guiding principles when considering allocations. Because of this, we have robust personal use, recreational and commercial sectors across the state of Alaska. This proposed reprioritization of the Board's allocation criteria needlessly transforms that solid guidance into an overly prescriptive process, limiting the Board's important flexibility and authority to make informed choices in the face of complex and diverse individual issues.

Furthermore, Proposal 171 forces the Board to choose winners and losers among Alaskan fishermen before a situation is even fully vetted, prioritizing the access and value of one type of fisherman over another. It limits the Board and Alaska's ability to determine the greatest public use and distribution of our shared resources on a case by case basis. With its expansive coastline and diversity of fisheries, it would be irresponsible to limit Alaska and its Board of Fisheries to such a prescriptive approach. Rather, history shows us that these decisions must be much more nuanced, weighing a complex network of the benefits each fishery provides to the food system, the economy and our traditions.

This proposal also directly compromises the Board's ability to meet a crucial guideline, the sustainable salmon policy: 5AAC39.222(c)(4)(D), 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." Forced prioritization of one user group over another would inhibit the Board's ability to follow this and other important guidelines that ensure our fisheries are diverse and healthy.

For these reasons NPFA strongly opposes Proposal 171, and asks the Board to take no action.

On behalf of our Board of Directors,

Malcolm Milne
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