

March 10, 2019

To: Chair Morisky and Members of the Alaska Board of Fisheries
From: Sue Jeffrey
Re: BOF Proposal 171

Dear Chair Morisky and Board Members,

Proposal 171 presents a sweeping change, not for the good. It undermines the principles upon which fisheries management in Alaska is built and will result in long-term costs to the State of Alaska and its people. I believe Proposal 171 is bad public policy and should be defeated for the following reasons:

- **Proposal 171 sounds a false alarm:** Current law already insures Personal Use Fishing takes priority over Commercial use. When a conservation concern arises, Commercial Fishing is shut down FIRST, per regulation; then, if deemed necessary, Sportsfishing is closed. After that, if further action is needed, then Personal Use Fishing is closed; and if the situation is dire, Subsistence Fishing is closed last.
- **Proposal 171 places a gag order on the BOF:** It mandates that Board Members *shall* use a prescribed list of prioritized allocation criteria that puts a damper on their fisheries expertise and experience when weighing the merits of individual proposals.
- **Proposal 171 sweeps under the rug** all but 20 years of Alaska history and fisheries data for the most populated regions of the state; it mandates that Board members consider *only* 20 years of fisheries history in non-subsistence areas.
- **Proposal 171 restricts the BOF deliberative process** by locking up decades of Alaska data and history.
- **Proposal 171 undermines the Board of Fisheries:** it puts blinders on Board members as they seek *all* relevant historical information and data; and it ties their hands to a prescribed set of allocation criteria during deliberations.
- **Proposal 171 removes** volumes of fisheries data and history from public discourse; it creates a black hole in the annals of Alaska fisheries history.
- **Proposal 171 hamstring Alaska's fisheries management system,** which State founders created to protect and develop Alaska's fisheries.

To ensure stability of Alaska's fisheries, the Board of Fisheries carefully develops management policies and regulations by facilitating open communication and information exchange between the public, federal and state fisheries experts, and Board members. The BOF involves the public at every step of its regulatory process. Proposal 171 breaks down these long held public bonds. For the sake of all Alaskans and for the protection and responsible development of Alaska's fisheries, I respectfully ask you to vote NO on Proposal 171.

Sue Jeffrey
Past Member, Alaska Board of Fisheries