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April 2, 2015

Representative Louise Stutes
Chair, House Fisheries Committee
State Capitol Room 416
Juneau AK, 99801
Rep.Louise.Stutes@akleg.gov

Re: OPPOSE HB110 – Personal Use Fishing Priority

Dear Representative Louise and committee members,

The Alaska Longline Fishermen's Association (ALFA) opposes HB110, which seeks to provide a priority for Personal Use fisheries second only to subsistence. Our 100+ members believe HB110 will undermine sustainable management of our State's fisheries and destroy the existing management process that has so successfully rebuilt and protected Alaska's salmon stocks since Statehood. In addition, ALFA recognizes the potential for HB110 to significantly reduce the economic and employment benefits Alaska's commercial and sport fisheries currently provide to the State. Our concerns are described in more detail below.

ALFA is a non-profit association of vessel owners and deckhands dedicated to sustainable fisheries and strong fishing communities. Most of our members live in the rural communities of Southeast Alaska. Our members participate in commercial, sport, personal use, and subsistence fisheries. ALFA recognizes the importance of Personal Use fisheries to the residents of this State; however, because fishery resources are limited, we recognize that Personal Use fisheries must also be limited.

The Alaska legislature has granted the Board of Fisheries the authority to manage Alaska's fisheries. The Board makeup includes representatives confirmed by the legislature based on their ability to represent all fishery user groups through sound judgment and careful consideration of the full range of benefits that fisheries provide, including nutritional needs; history and usage by residents and non residents; importance to the economy of the state, region and local area; and recreational opportunity. The Board follows a deliberative process to make conservation and allocation decisions based on science and public input. The Department of Fish and Game follows the Board's direction to achieve management goals that protect and preserve Alaska's fishery resources. *HB110 attempts to undermine this process and the authority of both the Board and the Department.*

The intent by the Board of Fisheries in establishing Personal Use fisheries is clear in 5 AAC 77.001 (4) (b), namely that personal use fisheries are: "...allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest." ALFA supports this intent. Based on this intent, ninety-five Personal Use fisheries have been established in Alaska. These fisheries are open to all residents. If HB110 were to pass as proposed, population growth and expanding Personal Use harvest in one region of the State will have detrimental impacts on existing harvesters and historic patterns of use in other regions, which is in direct violation of the Personal Use intent stated above.

Finally, Personal Use fisheries for salmon are conducted in-river and can have a significant impact on spawning stocks. While Personal Use fishermen may harvest fewer fish compared to commercial harvesters, they still bear a responsibility to conserve the resource. HB110 threatens to take away one of the tools that managers need to do their jobs: the use of commercial harvest data from early season fishery openers to assess run strength and timing.

In closing, ALFA opposes priority status for Personal Use fisheries and considers such a designation to be contrary to sound resource management, potentially harmful to some Alaskan residents, and contrary to the true intent of Personal Use fisheries. We strongly urge this Committee, and the Alaska State Legislature, to leave the prioritization of fishery allocations with the Board of Fisheries and the implementation of those decisions with the Department of Fish and Game.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Behnken".

Linda Behnken
(Executive Director, ALFA)