



United Cook Inlet Drift Association

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Date: April 6, 2015

Addressee: House Fisheries Committee
Representative Louise Stutes, Chair
Alaska State Legislature
State Capitol, Room 416
Juneau, AK 99801

RE: **OPPOSE HB110, PERSONAL USE PRIORITY**

Dear Representative Stutes and committee members,

I am writing on behalf of the United Cook Inlet Drift Association Board of Directors, we represent the 585 drift gillnet permit holders in Cook Inlet, our members and their families, to oppose HB 110- "Personal Use Priority".

It is our position that HB 110 is not in the best interest of Alaskans; it will harm more Alaskan's than it will benefit. All users of our fishery resources must share in the conservation burden to ensure that our fishery resources are sustainable into the future. The items below are just a partial list of problems that we can foresee if HB 110 is allowed to pass.

Passage of HB 110 would create an administrative burden for ADF&G and the BOF

The Alaska State Legislature delegated the authority to the State Board of Fisheries for the allocation of fishery resources. Fishery management plans need to be biologically based and integrated to ensure sustainability while allowing the greatest possible harvest. Decisions regarding allocation of these resources needs to follow certain criteria to allow management plans to be effective. Priority status for a single user group would require that wherever Personal Use fisheries are allowed, the BOF must rewrite all the management plans for every stock or specie that would be affected. Currently there are about 80 Personal Use fisheries on both finfish and shellfish.

Unintended consequences

Many fisheries around the State are mixed stock fisheries. Fishery managers and management plans utilize time and area restrictions to reduce the harvest of a particular stock or to increase the harvest of a particular stock. Some management plans have specific fishing restriction language written into them. With those restrictions already in place, would HB 110 automatically assign a priority to Personal Use before the season even starts, or would a Personal Use priority only be triggered by additional in-season restrictions?

Would a Personal Use priority create an influx of new requests for PU fisheries across the State, on every fish stock and specie?

HB 110 uses a term “management goal” and then offers a constrained definition for that term. What effect would this new definition have on existing fishery management plans?

Allocation overrides science

Personal Use fisheries have little value as a management tool as there is very little real-time data available regarding number of participants and harvest levels on any given stock at any given time. Assigning a priority status to a user group, when there is currently no method for real-time enumeration of harvest data for such a user group, is contrary to the principles of Alaska Fisheries Policy; both the Sustainable Salmon Fishery Policy (5 AAC 39.222) and the Policy for the Management of Mixed Stock Fisheries (5 AAC 39.220) and the Magnuson-Stevens Act.

Alaska State Constitution, Article 8, Section 15

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the State.

Thank you for your attention to this important issue. Please contact us if you have any questions.

Sincerely,

David Martin
UCIDA President