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April 2, 2015

Representative Louise Stutes
Chair, House Fisheries Committee
State Capitol Room 416
Juneau, AK 99801

Re: Opposing Comment on HB110 Personal Use Priority

Dear Representative Stutes:

I am writing on behalf of the Alaska Salmon Alliance (ASA), Kenai Peninsula and Anchorage-based seafood processors, Great Pacific Seafoods, Icicle Seafoods, Snug Harbor Seafoods, Pacific Star Seafoods and Fishhawk to register our opposition to HB110, legislating Personal Use Priority. Our member companies are intimately familiar with the complexities and growth in the State of Alaska's most widely used Personal Use fisheries on the Kenai and Kasilof Rivers.

We note the heavy overplay in the Sponsor Statement to protect the needs of Alaska residents as a rationale for establishing a personal use priority in allocating fishery resources. You should be aware that the personal use salmon needs of Alaska residents are already provided for - up front - when ADF&G calculates its annual harvest forecasts for commercial, personal use and subsistence fisheries based on Kenai and Kasilof River stocks. In addition, as these personal use fisheries open on particular dates regardless of run timing or abundance, there already is a de-facto priority in place.

Thus it is not necessary to create legislation, unless the goal is to further exacerbate the divisiveness between user groups and undermine the state's ability to manage these salmon stocks. Legislating fisheries in the manner of HB110 inevitably leads to a cascade of unintended consequences that will create additional management problems.

As there are over 120 Personal Use fisheries on different stocks and different species across the State, the singular focus of HB 110 (SB42) would create significant chaos and disruption in many management plans. Implementation of a personal use priority would create a significant cost burden on ADFG and the Board of Fisheries. There are also legal questions as to whether passage of HB110 (SB42) would in general violate Article 8 of the Alaska State Constitution, or specifically Section 15. A request for review should be submitted to the Legislative Affairs Agency.

The Legislature should also be aware that in the Upper Cook Inlet commercial salmon fisheries, which will bear the brunt of further restrictive allocations under a Personal Use Priority scenario, there are in excess of 5,000 persons employed in our industry. The harvest sector of the industry represented by over 1,000 fishing families are comprised of over 70% residents of mostly South Central Alaska.

We ask you to oppose this onerous and unnecessary legislation.

Regards,

Arni Thomson
Executive Director