



Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

March 12, 2022

RE: Proposal #166

We have been listening online to the committee of a whole meeting and would like to provide a further perspective to proposal #166. SEAFA is opposed changing a current limited entry permit and its associated right to fish by area and gear type for the benefit of another permit type. The CFEC letter suggests that what is needed to be seen by everyone is what the management plan would look like and what would actually need to be changed. Not a concept and not a letter of support for a concept but an actual fully fleshed out management plan with regulatory language. Here are the possible management designs we have thought about as an association and discussed.

The proposers have been persistent with this idea and I applaud them for it but what I heard him say in discussing how this proposal might work would be to pre-register at the start of the year and then the Dept would carve out part of the Sitka Sound herring allocation based on the number of permit holders who registered. THIS WOULD BE ILLEGAL and would be allocating within a fishery gear type/permit (Chignik Co-op).

The only way forward as we see it without legal hurdles is if the Board adopted an equal quota share management plan and this management plan and then approached the CFEC to allow this permit to use another gear type. (Similar to what was done with sablefish original gear type was longline and now either longline or pot gear have been authorized and allowed to be used)

If you just send this back to CFEC as this concept, the result will be the same because what CFEC in that situation would have to look at is the same fundamental issue as they previously did, was the CFEC L21A permit correctly issued originally.

Just what I would have provided to the conversation if I had been there in person.

Sincerely,

Kathy Hansen
Executive Director

