On-Time Public Comment Index

ALASKA JOINT BOARD OF FISHERIES AND BOARD OF GAME MEETING
March 21-25, 2019

WRITTEN COMMENTS

BY

The Bristol Bay Economic Development Corporation

March 7, 2019

Board Meeting: March 21-25, 2019

Name: Gene J Sandone
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Do you consent to your contact information being included on printed copies of your comment? Yes

Bristol Bay Economic Development Corporation (BBEDC) has reviewed all the Joint Board of Fisheries and Board of Game proposals. Our recommendations to SUPPORT or OPPOSE are presented in Table 1. Also, there are a number of proposals that we took NO ACTION on because they were either not applicable to our region or we did not understand the reasoning of the proposer. We also made comments on Proposals 24 and 33. These comments follow:

Proposal 24:

PROPOSAL 24 - 5 AAC 96.060. Uniform rules of operation. Add language to clarify advisory committee meetings are subject to the Open Meetings Act and modify noncompliant provisions as follows: 5 AAC 96.060. Uniform rules of operation. ….

(o) Meetings. **Advisory committees are considered governing bodies in accordance with the Open Meetings Act in AS 44.62.310.**

(1) Regular meeting. A committee shall meet at least twice a year to remain active under 5 AAC 96.450. A committee may meet at times appropriate to the process described in 5 AAC 96.610, and at other times to formulate regulatory proposals, review and comment on proposals, and consider matters appropriate to the committee's functions under 5 AAC 96.050. A chairman, **the department, or two members of the committee** [OR A MAJORITY OF THE FULL COMMITTEE MEMBERSHIP] may call a regular meeting.

BBEDC recommends that the Joint Board strikes "**the department**" from this proposal. It should read: "*A chairman [THE DEPARTMENT]* ***or two members of the committee*** *may call a regular meeting."* BBEDC objects to allowing the department to call a meeting. BBEDC believes that there is no reason for the department to call an Advisory Committee meeting.

Proposal 33:

PROPOSAL 33 - 5 AAC 96.610. Procedure for developing fish and game regulations. Amend the Joint Board's procedure for establishing fish and game regulations as follows: 5 AAC 96.610. Procedure for developing fish and game regulations

(a) For the purpose of developing fish and game regulations, each board will observe the procedures set out in this section. The deadlines for each phase will be set by the appropriate board for each meeting and will be announced to committees and the public.

(b) Phase 1. Each board will solicit regulatory proposals or comments to facilitate that board's deliberations. The boards may limit those sections or portions of the existing regulations that will be open for change. The boards will provide forms to be used in preparing proposals. Notices soliciting proposals will be distributed statewide. In order to be considered, **all** [A] proposals**, including board generated proposals,** must be received by the boards before the designated deadline [UNLESS PROVIDED OTHERWISE BY A BOARD].

(c) Phase 2. After the deadline for receiving proposals, the boards support section shall compile all proposals received on time, including proposals from department staff, **the board**, and other government agencies, distribute them to the public through department offices, and send them to the committees.

(d) Phase 3. Committees may review the proposals at a public meeting and may request technical and scientific support data and prepared testimony from the department. 29

(e) Phase 4. Each board will give legal notice of timely received proposals. In accordance with the Administrative Procedure Act (AS 44.62), each board will hold a public hearing and will act on proposals [OR DEVELOP ALTERNATIVES ON THE SUBJECT MATTER LEGALLY NOTICED]. **Board amendments are limited as to not contradict the original intent of the proposal.** The final decision on all proposals remains the responsibility of a board.

(f) Phase 5. After completion of procedures required by the Administrative Procedure Act (AS 44.62), a board will **promptly** notify each committee of the actions taken on each committee's respective recommendations and proposals and the reasons for those actions.

BBEDC believes that the current language in 5 AAC 96.610 (a), (b), (c) and (d) should not be altered. BBEDC believes that the method for generating proposals by the Boards is appropriate. In the least, the Boards should not be limited by the proposal deadline. However, BBEDC firmly believes that the additional language in (e) is appropriate and warranted. Board amendments to proposals should not be developed to contradict the original intent of the proposal. The Boards have done this in the past. For example, during the February 2007 Ak Pen/Aleutian Islands Board of Fisheries the Board of the Board of Fisheries amended a proposal that opened a new fishery when the intent of the original proposal, Proposal 210, was to limit fishing to one mile from shore. The Board of Fisheries amended this proposal to open a closed section, the Outer Port Heiden Section. This section was open to commercial fishing on a mixed stock when the proponent was seeking to limit commercial fishing.

Table 1. Actions taken to support or oppose the Joint Board of Fisheries and Game proposals by Bristol Bay Economic Development Corporation (BBEDC). The table also notes when no action was taken by BBEDC.

JOINT BOARD PROPOSALS					
			POSITION		
Prop #	Proposal Description	Proposed by	ADF&G	BBEDC	BOF
Establishment and Membership of Advisory Committees					
1	**5 AAC 96.021. Establishment of advisory committees**. Designate seats for the community of Craig and the Port St. Nicholas area on the Craig Advisory Committee	Craig Fish and Game Advisory Committee		**NO ACTION**	
2	5 AAC 96.021. Establishment of advisory committees. Move the seat designation for the community of Chevak from the Central Bering Sea Advisory Committee to the Coastal Lower Yukon Advisory Committee	Alaska Department of Fish and Game		**NO ACTION**	
3	**5 AAC 96.021. Establishment of advisory committees**. Add two undesignated seats to the Central Kuskokwim Advisory Committee	Lisa Feyereisen		**NO ACTION**	
4	**5 AAC 96.021. Establishment of advisory committees.** Move the Stony/Holitna Advisory Committee from the Western Region to the Interior Region	Stony/Holitna Fish and Game AC		**NO ACTION**	
5	**5 AAC 96.021. Establishment of advisory committees.** Designate two seats on the Stony/Holitna Advisory Committee for the community of Georgetown	Georgetown Tribal Council		**NO ACTION**	
6	**5 AAC 96.021. Establishment of advisory committees and 5 AAC 97.005. Areas of jurisdiction for advisory committees.** Dissolve the Lake Minchumina Advisory Committee	Alaska Department of Fish and Game		**NO ACTION**	
7	**5 AAC 96.021. Establishment of advisory committees.** Reduce the membership for the Lake Iliamna Advisory Committee to ten and add designations for the communities of Pope Vannoy Landing and Port Alsworth AMEND by Iliamna AC: not designate a seat for Popr Vannoy and substitue an undesignated seat.	Lake Iliamna Fish and Game AC		**SUPPORT**	
8	**5 AAC 96.021. Establishment of advisory committees.** Establish seat designations for the Naknek/Kvichak Advisory Committee	Everett Thompson		**SUPPORT**	
9	**5 AAC 96.021. Establishment of advisory committees.** Change the name of the Kotzebue Advisory Committee to Kotzebue Sound Advisory Committee	Alex Whiting		**NO ACTION**	
10	**5 AAC 96.021. Establishment of advisory committees.** Reduce the number of undesignated seats for advisory committees in the Arctic region	Alaska Department of Fish and Game		**NO ACTION**	
11	**5 AAC 96.020. Creation of local fish and game advisory committees**. Consolidate regulations addressing the creation of advisory committees	Alaska Department of Fish and Game		**SUPPORT**	
12	**5 AAC 92.020. Creation of local fish and game advisory committees**. Require members to reside within the committee's geographic area	Rebecca Skinner		**SUPPORT**	

Table 1. (p 2 of 3).

Prop #	Proposal Description	Proposed by	ADF&G	BBEDC	BOF
Administration of Advisory Committees					
26	**5 AAC 96.XXX. New regulation.** Schedule certain requests for advisory committees to be acted upon by each board during regularly scheduled meetings	Fairbanks Fish and Game AC		**NO ACTION**	
27	**5 AAC 96.450. Committee status and change of status.** Remove the concept of "active" and "inactive" committees	Alaska Department of Fish and Game		**SUPPORT**	
28	**5 AAC 96.640. Regular meetings or 5 AAC 96.641. New regulation**. Allow advisory committee representatives to be at the board table during deliberations for those proposals the advisory committee authored	Sue Entsminger		**OPPOSE**	
29	**5 AAC 96.XXX. New Section.** Allow advisory committee representatives a seat at the board table during deliberations on proposals affecting their region	Frank and Sue Entsminger		**OPPOSE**	
Process for Adopting Fish and Game Regulations					
30	**5 AAC 96.910. Definitions**. Provide a definition for board work sessions and allow submitters of Agenda Changes Requests (ACRs) to provide testimony at work sessions	Fairbanks Fish and Game AC		**OPPOSE**	
31	**5 AAC 96.910. Definitions**. Provide a definition for a board hearing of at least three board members with a public comment requirement	Fairbanks Fish and Game AC		**NO ACTION**	
32	**5 AAC 96.600. Meetings**. Repeal the provision for Board of Fisheries members attending advisory committee meetings to be in compliance with the statutory requirement for holding board meetings in specific areas of the state	Fairbanks Fish and Game AC		**NO ACTION**	
33	**5 AAC 96.610. Procedure for developing fish and game regulations**. Amend the Joint Board's procedure for establishing fish and game regulations	Tammie Wilson		**SUPPORT AS AMENDED**	
34	**5 AAC 96.625. Joint board petition policy.** Amend the Joint Board Petition Policy to correct a contradiction with the subsistence proposal policy	Alaska Department of Fish and Game		**NO ACTION**	
35	**5 AAC 96.625. Joint board petition policy**. Repeal and rewrite the Joint Board Petition Policy	Fairbanks Fish and Game AC		**NO ACTION**	
36	**5 AAC 96.625. Joint board petition policy and 5 AAC 96.910. Definitions**. Allow a petitioner the opportunity to present information about the petition to the boards and establish definitions for unforeseen and unexpected events and situations	Paul Shadura		**NO ACTION**	
37	**5 AAC 96.615. Subsistence proposal policy.** Repeal the boards' Subsistence Proposal Policy	Fairbanks Fish and Game AC		**NO ACTION**	
38	**5 AAC 96.6XX. Adoption of Fish and Game Regulations.** Require the Board of Fisheries to schedule shellfish regulations for any that have been closed by emergency order for 24 consecutive months	Homer Fish and Game AC		**NO ACTION**	

Table 1. (page 3 of 3).

Prop #	Proposal Description	Proposed by	ADF&G	BBEDC	BOF
Errors, Omissions, and Clarifications					
39	**5 AAC Part 6 - Fish and Game Advisory Committees; Chapter 96 - Local fish and game advisory committees and regional councils; 5 AAC 96.021. Establishment of advisory committees; 5 AAC 96.050. Functions of local fish and game advisory committees; 5 AAC 96.640. Regular meetings; and 5 AAC 97.005. Areas of jurisdiction**	Alaska Department of Fish and Game		**NO ACTION**	
40	**5 AAC 96.060. Uniform rules of operation; 5 AAC 96.460. Attendance at meetings**; 5 AAC 96.600. Meetings; and 5 AAC 96.610 Procedure for developing fish and game regulations. Amend regulations to align and clarify current practices for advisory committees and the process for adopting fish and game regulations	Alaska Department of Fish and Game		**NO ACTION**	

Chevak Traditional Council
P.O. Box 140
Chevak, Alaska 99563
(907) 858-7428 fax (907) 858-7812
chevaktc@gmail.com

October 19, 2018

Alaska Department of Fish and Game
P.O. Box 1467
Bethel, AK 99559

RE: Joint Board proposal (#2)

Dear Sirs:

The Chevak Traditional Council is in favor of remaining in the Central Bering Sea AC region. We are pleased and want to remain consistent with where we're at after all these years.
We thank you for your consideration to this matter and also thank David Bill Sr., Chair for the Central Bering Sea AC, for his input.

Sincerely,
Roy J. Atchak
First Chief

Samson Matchian
Interim Tribal Administrator

CC: Chevak Traditional Council
File

Customary & Traditional Use Committee
Joint Boards of Fish and Game Proposal Comments

Comments:

We support Proposal 11 to allow the Joint Boards of Fish and Game to create and assign local fish and game committees, for all residents to participate in the regulatory system, to appoint 5 members to an advisory committee, and begin its duties after 5 members are appointed.

Regulations should be clarified in 5 AAC 96.020 to provide guidance in forming an advisory committee and appointing 5 members for residents to participate in an advisory committee.

Comments:

We support Proposal 12 to state that members of an advisory committee must reside within the community they wish to represent. Requiring members to reside in a community of the advisory committee that he or she serves on will be an improvement upon the process.

A community should be defined as domicile of an advisory committee member in which interaction is amongst people in the community, have shared common interests, and have social and economic connection to the community.

A member, who lives outside the list of communities in the advisory committee's areas, may not provide reliable, sound, input into regulatory comments on fisheries, wildlife and trapping proposals. He or she may give conflicting opinions and advice, based upon where he or she resides, that are not supported by local residents that live in the geographic areas. Bias of opinion may occur.

Comments:

On Proposal 13, see comments under Proposal 12.

Comments:

We support Proposal 15 to amend the emergency closure process to exclude advisory committees that have been inactive for three years. A majority affirmative vote is required for an emergency closure.

Active committees that have met regularly or held special meetings within the last three years should continue to be able to vote for emergency closures.

Another consideration is to dis-band advisory committees, if they have not met on a regular basis within the last five years.

Comments:

We oppose Proposal 16 to expand the functions of advisory committee to encourage the involvement of youth and elders. Elders could be elected to serve on advisory committees. Youth can participate in the process by attending meetings.

Youth and elders can develop proposals, make recommendations on those proposals by attending AC meetings. Advisory committee meetings are public forums for interested community members to attend to express their opinions on wildlife or fisheries proposals or to discuss other concerns, such as fish and wildlife habitat.

Comments:

We support Proposal 17 to change regulations on conducting elections, determine vacancies, nominate members, provide public notice, establish quorum for elections, determine election locations, and report election results.

Changing regulations for advisory committees will help to ensure ACs perform better. Fourteen day notice for election for a vacancy will provide the public time to be aware of a vacant seat, and put regulatory election process in one place so ACs can understand regulations and improve upon AC meetings.

Removal for cause listed as listed in this proposal will be helpful to remove AC members that do not show up to meetings for whatever reason. This will help to clarify reasons for removal of members on ACs.

Requirement to remove quorums to hold elections for some advisory committees will be easier for them to hold elections. A few ACs cannot meet this regulation.

Holding required elections for designated and community seats will ensure community seats are filled with people within their communities.

The Department should go through 5 AAC 96.060. Election procedures and make necessary changes to clarify regulations, update regulations, and make it more understandable to the public.

Comments:

We support Proposal 18 to clarify the provision that advisory committee members may not refuse membership to a nominee, refusals may occur only if elections are held for non-community seats. Community seats may not be well represented on the advisory committees. These seats should be represented by community members within their communities.

Only community members from their communities will be able to best represent his or her community. He or she knows and hears what the community members' concerns are within their community.

Comments:

On Proposal 19, see comments under Proposal 20 and 21.

Comments:

We support Proposal 20 to clarify regulations for AC Chair to have authority to remove member(s) for cause as listed in Proposal 20.

Chair of an AC will know who is missing meetings, he or she will make the best, informed decision on dismissing the AC member. Chair should not have to wait for joint board to meet to dismiss an AC member from advisory committee.

Comments:

We support Proposal 21 to allow Chairs of ACs to declare a vacancy on a committee when a member's term is set to expire or has expired. Chairs should have the authority to declare vacancies on advisory committees, and not have to wait upon joint board to act on vacancies. Joint board does not meet too often, and ACs will continue to have vacant seats.

Chairs of ACs know when a committee member's term will expire or will expire. They could declare a vacant seat when it is needed so that elections could be held to keep the seat filled.

Comments:

We oppose Proposal 22 to allow ACs to vote through electronic emails. Electronic votes are not allowed under AS 44.62.310. Additionally, rural areas in Alaska have spotty internet, they would not be able to vote electronically on AC matters. In person meetings should continue to be the way AC meetings are held and business matters are voted on.

Comments:

We support Proposal 23 to allow abstention vote to be used only if the intent is in writing to make it clear why the person abstained from voting. Written comments will provide proof that there was a quorum at an AC meeting. Majority of the remaining members voting should always carry the vote.

Comments:

We support Proposal 24 to allow the department or 2 AC members to call an AC meeting and to have a member other than secretary to provide a preliminary approval of the recommendations. AC meetings may not have been held for long periods of time and AC would probably be in an inactive status. This might get the AC active again.

Comments:

We oppose Proposal 26, this will not reduce meetings, it may actually, increase meetings. Each board would act on AC matters independently, each board may disagree with each other and a joint meeting would have to be held to discuss disagreement.

Comments:

No Comment on Proposal 28. This is already in regulations. In 5 AAC 96.440. Board Assistance. It states "that committees may plan maximum participation in the boards' deliberations". Alaska Board of Game allows this to occur during deliberations. Chairperson of ABOG may at times invite Chair of AC to ABOG meeting during deliberation to ask them questions about a proposal.

Comments:

On Proposal 29, see comments under Proposal 28.

Comments:

We support Proposal 30 to add definition for work session. Public should be able to provide testimony on their ACR[s]. The proponent will have to wait 3 years before action can be taken on their proposal[s].

An example is the Department making a determination to place a restriction on a fisheries or wildlife hunt, but doesn't consider the situation to be an emergency. Members of the public, however, may deem it to be an emergency situation, submit an ACR to request immediate action on their ACR. This has actually happened at an ABOF meeting.

Members of the public should be able to speak to their ACRs in situations when there is a concern and an ACR is submitted to the Alaska Board of Game. ACRs are usually submitted, because there is a concern, outside of the cycle, which cannot be addressed for the following 3 years.

Comments:

We oppose Proposal 31 to add a definition for a board bearing of at least three board members to provide notice to hold a public meeting. Alaska Department of Fish & Game does not have funds to hold extra meetings. It would be too costly to hold a meeting, also this could be used by people who think they need to hold a meeting for minor issues. The end result may not save monies for the department.

Comments:

We support Proposal 32 to remove language in 5 AAC 96.600(b) as follows: [THE ATTENDANCE OF A BOARD OF FISHERIES MEMBER AT A COMMITTEE MEETING CONSTITUTES A BOARD HEARING IN ACCORDANCE WITH AS 16.05.300(B).

ABOF attending an advisory committee meeting is not a "hearing". It should be removed from 5 AAC 96.600(b). Department needs to review and update Alaska Statutes and Alaska codified language in 5 AAC 96.

Comments:

We support Proposal 33 that all proposals, including board generated proposals, must be received by the boards before the designated deadline, and that the Board must not change the intent of the proposals submitted to them, and will promptly notify each committee of Boards' actions.

If the Board and the Department submits a proposal it must be submitted on time along with all the proposals. Removing UNLESS PROVIDED OHTERWISE BY A BOARD will ensure that a Board may not submit a proposal without public input on the proposal.

The original intent of the proposal must be kept as is and voted on by the Board. No significant changes to the proposals should be made to the proposal. Boards should be required to notify advisory committees within 30 on actions taken on proposals.

Comments:

We support Proposal 34 to correct contradiction with Joint Board Petition Policy. Removing the words, EXCEPT FOR PETITIONS DEALING WITH SUBIS SUBSISTENCE HUNTING OR SUBSISTENCE FISHING, WHICH WILL BE EVALUATED ON A CASE-BY-CASE BASIS UNDER THE CRITERIA IN 5 AAC 96.615(A), will allow proposals to be taken up without the requirement that they be submitted on time. This is basically, a house keeping proposal to allow subsistence proposals to be addressed through Joint Petition Policy.

On Proposal 35, see comments under Proposal 34.

Comments:

We support Proposal 36 to allow a proponent to speak to his or her proposal and to solicit comment for 30 days before taking action.

Additionally, in the Joint Board petition policy, the words " an unforeseen, unexpected event, unforeseen or unexpected", should be defined so that it is clear and is a concise term so that the public may understand what it means. Boards of Fisheries needs to define this under 5 AAC 96. 910 definitions so that the public will know will know what constitutes an emergency situation.

Comments:

On Proposal 37, see comments under Proposal 34.

Comments:

We support Proposal 40. The Department should go through 5 AAC 96.060. Election procedures to make necessary changes to clarify regulations, update regulations, and make it more understandable to the public.

Submitted by:

Gloria Stickwan
for
Linda Pete
CT Committee Chair

Date: February 14, 2019

GEORGETOWN
tribal council

Georgetown Tribal Council
Native Village of Georgetown
5313 Arctic Blvd., Suite 104
Anchorage, AK 99518

RE: Comments - Joint Board of Fish and Game Proposal 5

Dear Joint Board Fish and Game,

Georgetown Tribal Council would like to withdraw Proposal 5 from consideration. Through communication and collaboration with the Central Kuskokwim and Stony-Holitna Advisory Committees, Georgetown now has representation in both groups. There is no longer a need to add additional seats for Georgetown at this time to the Stony-Holitna Advisory Committee.

Sincerely,

Tribal Administrator
Will Hartman

Submitted By
Kurt Whitehead
Submitted On
1/24/2019 12:00:23 PM
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Craig AC

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Me. Chairman and Board Members,

I am a current member of the Craig AC and recently represented the AC at the SE meetings in Petersburg. I live 5.5 miles outside of Klawock, year round and live 11.5 miles from Craig.

Klawock and Craig are connected by a 6 mile paved road and both communities share the same navigable waters ways, roads, habitat, game, fish, fuel dock, etc. Many members of both communities care about the same issues and generally regard themselves as living in the same area with different zip codes. If this proposal passes then do I have to resign from the board???

I fail to see what good this proposal will accomplish. The Craig AC has had two meetings together and each meeting was very productive, professional and accomplished a great deal. Just because a person lives a short distance from the main community shouldn't preclude them from sitting on an AC particularly when the issues facing the AC are the same issues and encompass the same waters, watersheds, habitat, animals and people.

The city limits of Craig and Klawock are both only 1 mile. If someone has the desire to participate on an AC then why should they be precluded?

If someone has the desire to positively contribute, has intimate knowledge of local game, local habitat and it's users, why shouldn't they be able to participate even if they live 100 miles away?

This proposal is devisive and will NOT benefit Alaska's fish and game resources.

Thank you!

From: A. Jahnke Robert
To: DFG, BOF Comments (DFG sponsored)
Subject: comments
Date: Monday, October 1, 2018 2:23:26 PM

Pg 9 ,proposal 12: It is my understanding from board support that an AC member need not reside in the state of Alaska , if this is so ,I feel it is wrong and should be changed. Pg 11 ,proposal 15 ,Yes I agree ,Active in the last three years. Pg 13 ,proposal 17 Elections Procedures. [1] Vacancy. [b] , Yes, Missing three meetings not justified , you are out. Pg 14 , 5 AAC96.910 Definitions. In 5 AAC 96-5AAC99 Member should live in the area and "State" of said committee by what ever definition it takes. Pg 21 ,Proposal 25 Yes Pg. 24 Proposal 28, Yes absolutely agree. My back ground is 48 yrs. in Alaska , two terms [late 70's-early 80's] Ketchikan AC , and presently involved with the restart of the new Ketchikan AC. Also helped recently form the new Southern Southeast Chapter of The Alaska Trappers Association.

UNITED FISHERMEN OF ALASKA

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March 5, 2019

Alaska Board of Fisheries & Alaska Board of Game
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Opposition to Proposals 28 & 29
Support for Proposal 33

Dear Alaska Board of Fisheries and Alaska Board of Game Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

Opposition to Proposals 28 & 29

United Fishermen of Alaska oppose Joint Board Proposals 28 & 29 which would allow for an advisory committee representative to be at the board table during deliberations. Advisory Committee members are already allowed 10 minutes to testify in front of the Board of Fisheries and 15 minutes in front of the Board of Game compared to the three and five minutes allotted for members of the public. Regulation **96.440 Board Assistance**, states that the "boards will provide information regarding board meetings to committees so that committees may plan maximum participation in the board's deliberations. In addition, a board may request a committee to meet and to formulate recommendations on a subject or issue identified by the board."

We do not believe these two proposals are necessary for the boards to carry out successful deliberations. There is ample time provided for advisory committee members to share their regional expertise during public testimony, committee of the whole, and with one-on-one communication with board members.

Support for Proposal 33

We support in concept Proposal 33 which seeks to amend the Joint Board's procedure for establishing Fish and Game regulations. In recent years, Board Generated Proposals have become a "catch-all" for proposals submitted out of cycle or after the deadline, and for emergency petitions that don't meet the emergency petition criteria.

The creation of Board Generated Proposals greatly inhibits public process, which is one of the greatest aspects of the Board of Fish and the Board of Game. When boards are allowed to

create a Board Generated Proposal on the spot, without public notice, it creates distrust in the process which is built on transparency.

The rise in Board Generated Proposals has also created a financial burden on members of the public who now find they need to frequent meetings that are not within their normal meeting cycle because they need to be present in case the board drops a new proposal that affects their region or livelihood.

By amending the procedure for how regulations are developed within the board, public trust and transparency will be re-established.

Thank you for the opportunity to submit these comments.

Sincerely,

Matt Alward
President

Frances H. Leach
Executive Director

MEMBER ORGANIZATIONS
Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association
Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association
Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association