

Public Comments & Record Copies

Alaska Board of Fisheries Work Session (Oct. 2020) Documents
Excerpted for Relevance to Meeting Schedule Due to COVID-19

Chris Guggenbickler	PC03
Cordova District Fishermen United	PC04
Gale Vick	PC05
Northern Southeast Regional Aquaculture Association	PC09
Southeast Alaska Seiners Association	PC11
Southern Southeast Regional Aquaculture Association	PC12
Steven Anderson	PC13
United Southeast Alaska Gillnetters.....	PC14
Southeast Alaska Fishermen’s Alliance	RC 10
OBI Seafoods & Icicle Seafoods	RC 12
Alaska Trollers Association/Amy Daugherty.....	RC 13
Alaska Trollers Association/Matthew Donohoe	RC 20



From: [Chris Guggenbickler](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: SE BOF Proposals
Date: Wednesday, September 30, 2020 3:27:02 PM

Dear Board of Fish members,

As a SE Advisory Committee (AC) chair I would ask you to consider how we will conduct safe AC meetings in preparation for a spring BOF meeting. The AC process is paramount for public participation by local stakeholders in the BOF process. As many individuals struggle with technology and the means to do so I hope you will consider how the State and board support will supply and support the means for public participation. This stakeholder participation should not be marginalized.

Thank you for the opportunity to comment on this subject.

Wrangell AC Chair
Chris Guggenbickler

Ccgugg@gci.net
(907)305-0531



September 30, 2020

Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Members of the Alaska Board of Fisheries,

Cordova District Fishermen United is a 501(c)5 non-profit organization that advocates on behalf of the commercial fishing fleet of the Copper River, Prince William Sound. CDFU is a regular presence at Board of Fisheries meetings and we value the established relationships we have built with members of the Board, members of various user groups around the state, and state employees during these meetings. We value and appreciate the open public process that exists with the current Board of Fisheries structure, and regarding the covid-19 pandemic have the following concerns:

It is of utmost importance to keep the integrity of Board of Fisheries meetings intact, and as regular participants in these meetings, see no feasible way how this can be done online or in any virtual capacity. There are also concerns for limiting public access and participation if the number of attendees were to be capped in any way. Further, it is difficult to ascertain what level of precautions will be necessary 6 months from now, which therefore makes it difficult to plan potential meeting dates.

With this in mind, we are appreciative of the Board's decision to postpone the 2020 Prince William Sound meeting until at minimum, March of 2021. However, we encourage the Board to remember that there are active finfish and shellfish fisheries happening in Prince William Sound during both March and April, and holding the Prince William Sound meeting during this time could potentially limit public participation from those who are actively engaging in some of the very fisheries this meeting will be addressing. That said, it is absolutely critical that if the meeting is not postponed to December of 2021 and if it must occur before the end of the State of Alaska's fiscal year, that this meeting take place prior to the end of April, far in advance of the mid-May start date for the commercial and subsistence salmon seasons in Prince William Sound, which would disproportionately exclude fishery participants from within our region.



We also encourage the Board of Fisheries Board Support Section to work with the local communities on ensuring that adequate testing is accessible and available for any in-person meetings held prior to the end of the pandemic, in order to protect members of the public and rural communities from further potential outbreaks.

Thank you for your time and consideration of our comments,

Chelsea Haisman
Executive Director



Submitted By
GALE K. VICK
Submitted On
9/30/2020 11:36:34 PM
Affiliation

I am writing to request the following consideration for the Work Session: Regardless of changes in other board meeting schedules, conduct a Hatchery Committee meeting by Zoom in March, as scheduled, for the benefit of presenting Department reports and science review updates. Allow for the normal commentary procedure. This would be preparatory to the PWS re-scheduled meeting. Thank you.
Gale K. Vick, Fairbanks



Submitted By
Scott Wagner
Submitted On
9/30/2020 11:24:45 AM
Affiliation
NSRAA

Phone
907 747-6850
Email
scott_wagner@nsraa.org
Address
1308 Sawmill Creek Rd
Sitka, Alaska 99835

Sept 30, 2020

Alaska Board of Fisheries

Ms. Marit Carlson-Van Dort, Chair

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

On behalf of Northern Southeast Regional Aquaculture Association (NSRAA) I am submitting these comments regarding the upcoming BOF Work Session and potential discussion of taking up time sensitive proposals prior to the 2021 commercial salmon season in a non-traditional meeting setting. NSRAA does not have any association proposals before the board in the 2020/2021 cycle. However, there are two proposals submitted by Pioneer Alaskan Fisheries INC, 101 and 103, that have the potential to significantly affect our organization and the fishermen we represent. These two proposals are not time sensitive in nature, and should be taken up when in-person BOF meetings can be safely held.

These two proposals, along with 4 others submitted by same organization for the Prince William Sound region, seek large scale modification of Hatchery Salmon Management Plans and Allocation Management Plans. ACR proposals submitted last year by same author listed similar concerns regarding hatchery operations and these proposals were not taken up out of cycle. Proposals 101 and 103, along with the others for PWS, deserve to be taken up when in-person meetings are possible. These Management Plans are the product of input from ADFG staff, hatchery operators, commercial salmon fishermen and the public at large. To **significantly** modify these in a non-traditional BOF meeting setting would be a disservice to the individuals and the collaborative nature that created them.

Sincerely,

Scott Wagner

NSRAA

General Manager



P.O. Box 714
Ward Cove, AK 99928
(907) 220-7630
info@seiners.net www.seiners.net

September 30, 2020

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

Re: BOF Meetings During the 2020/2021 Meeting Cycle

Dear Chairperson Carlson-Van Dort and the Alaska Board of Fisheries,

Thank you for the opportunity to comment about postponing the Southeast January 2021 meeting. Southeast Alaska Seiners Association (SEAS) appreciates that the BOF shares our views about the necessity to hold the meetings in person. The value of the process and the stakeholder's involvement and access to staff and the Board was reiterated by almost everyone at the Special Teleconference meeting on September 16th. That said, postponing until April or May disenfranchises the very stakeholders most of these proposals affect. Fishermen participate in a number of fisheries prior to and after the traditional salmon fishing season, and thus would not be able to participate in person, which is the intent of postponing. We would like the Board to seriously consider moving all scheduled meeting cycles back an entire year, and resetting the 3-year rotation cycle.

Groups prepare for months for these meetings. The fluidity of Covid-19 cases in a particular region makes the possibility of cancelling or restricting attendance numbers and changing meeting formats extremely likely if the meetings are held in early Spring. Pushing back all cycles by one year gives some level of confidence that there will be significant measures developed that will ensure everyone's safety and thus the ability to fully participate. Deadlines for comments and meeting dates will not be moving targets, and budget concerns around doubling up the meetings will be eliminated.

The Board could give Fish and Game the authority to add a year to the sunset dates of any regulations that will expire prior to the "new" meeting cycle year. Many of these regulations with sunset dates, at least in Southeast, were positions the gear groups agreed upon through compromise. To extend those positions an additional year, rather than perhaps adopting entirely new strategies because fishermen



were not in the room to advance their cause, is a much more advantageous outcome for everyone. The Board could hold on-line meetings to address issues that Board Support or Management deem essential, like “stocks of concern”.

The whole issue of the Advisory Committee process and how that will continue to function as an integral part of the BOF process has not gotten much attention. The Advisory Committee in Ketchikan has not met since the Covid-19 situation started. There is no clear path forward in an April/May postponement as to how these committees would meet and deliver local comments and concerns to the Board.

Thank you for your consideration of our views and opinions on this matter.

Sincerely,

A handwritten signature in blue ink that reads "Susan Doherty".

Susan Doherty
Executive Director SEAS



Southern SE Regional Aquaculture Association

14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348

September 30, 2020

Alaska Board of Fisheries
Ms. Märit Carlson-Van Dort, Chair

By Electronic Copy Only: dfg.bof.comments@alaska.gov

Re: Comments for Hatchery Work Session, October 15-16, 2020

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

The Southern Southeast Regional Aquaculture Association (SSRAA) is a regional non-profit salmon hatchery organization formed under state and federal law in 1976.

The purpose of these comments is to provide additional information and request priority consideration for Proposals 105 and 106, which SSRAA submitted for the delayed *Southeast and Yakutat Finfish and Shellfish* meeting. SSRAA requests that these proposals be heard and decided upon prior to the 2021 summer salmon fishing season, based on the following circumstances and reasoning:

1. Proposal 105: Port Saint Nicholas Terminal Harvest Area Salmon Management Plan. This management plan is intended to distribute the harvest of hatchery produced Chinook salmon in the Port Saint Nicholas (PSN) Terminal Harvest Area (THA) between the purse seine, troll and drift gillnet fleets. These users, along with other common property fishers in the terminal area, are expected to catch a majority of the terminal fish. SSRAA will clean up the remaining Chinook salmon as cost recovery.

In 2018, SSRAA moved 200,000 Chinook smolt from Neets Bay to PSN in response to Unuk River stock of concern issues, as Unuk Chinook pass through Neets Bay and are intercepted during the Neets Bay rotational fisheries. Relocating these fish to PSN removed them from the Behm Canal corridor to enable better management by ADF&G of the Unuk River stock and allow more fishing opportunity on SSRAA-produced Chinook. The total PSN release thus increased from 100,000 to 300,000 Chinook smolt in 2018. THA regulations in Neets Bay consisted of an early rotational fishery for the seine and gillnet fleets, along with continuous troll opportunity to target the 200,000 Chinook release. Since there is no THA at PSN yet, there are no rotational fisheries for any gear

groups. 2021 marks the first year that the dominant Chinook age-class will be returning to PSN, making the timing to address Proposal 105 critical.

SSRAA requests that the Board prioritize this as an on-time agenda item to avoid the allocation issues presented by having these fish come back without a plan to manage them.



PC12

2 of 2

2. Proposal 106: Modification of the Port Saint Nicholas Special Harvest Area. A Special Harvest Area (SHA) was previously established at PSN and has been used successfully to harvest the modest number of returning Chinook for cost recovery. However, due to the aforementioned increase in PSN Chinook smolt releases, an expanded area for cost recovery is needed to successfully capture the additional returning adult Chinook, as well as expanding the allowed gear types to include set and drift gillnet.

SSRAA requests that the Board prioritize this as an on-time agenda item so that SSRAA can effectively prosecute cost recovery harvest on Chinook salmon returning to PSN in 2021.

This Board of Fisheries meeting cycle is SSRAA's first opportunity to request regulation changes at PSN. The now-defunct Prince of Wales Hatchery Association (POWHA) had the PSN programs prior to 2015. Since then, SSRAA has assumed these programs as well as all of POWHA's Klawock River Hatchery programs.

Thank you for your consideration of these comments.

A handwritten signature in black ink, appearing to read "David Landis".

David Landis
General Manager



From: [Rintala, Jessalynn F. \(DFG\)](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: steven anderson message
Date: Thursday, August 13, 2020 1:25:48 PM

My reason for the contact is because I am a resident of Alaska and also reside in Wisconsin. I have obtained or was awarded caribou tags for the 562 hunt in Ak.. Though I would love to travel to Alaska for this hunt, I now no I would have to be quarantined at both the Canadian border first then again at the Tok border which would cost me a month of time and cost and living in my truck. Though this would be OK I rather not spend my trip in my truck and also the fact I would have to again be quarantined on my return trip. Now the reason for the long book message is I was forwarded to you to talk, inform or I do not know. Though I would love to be in Alaska now again the pandemic is stopping us all from enjoying or carrying out our plans. So at this time I would ask or request that somehow or somehow that Alaska will allow these tags to be valid for the next year. My belief is the herd will grow to a overpopulated size and cause problems or control. Yes they can increase the tags the next year, though people like me who have continually help control this and enjoy this hunt and trip will probably lose our tags for the next year. This includes my moose hunting tag also. So again I ask that the board finds a way to deal this matter.

My wish would be you stop the king fishing because of the pandemic and let them grow and reproduce, as I see there is an emergency order now. Though again the commercial fisherman have all ready done the damage. They should be a very short fishing season for them. So again so.e direction or just a notice of my opinion for future reference. My hope and plan is to look forward to a trip back again as possible for 2021. Thank you for your time and allowing me to fill your phone with a book of a text message.
Steven anderson

UNITED SOUTHEAST ALASKA GILLNETTERS



Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Comments for Work Session October 15-16, 2020

Dear Board of Fisheries members,

United Southeast Alaska Gillnetters would like to offer some considerations in deciding the meeting dates for the SE Finfish/Shellfish originally set for January of 2021 in Ketchikan.

Consider first that these meeting dates have always been in the dead of winter for a reason. The vast majority of the commercial fisheries in our region are closed. This allows for optimum participation in the process by stakeholders and the public at large.

Consider that if the SE meeting were held in March, it is likely that stakeholders in the herring pound fishery, Sitka Sac Roe, halibut and blackcod fisheries, and possibly golden king crab fishery, would have their participation marginalized. Were the aforementioned meeting held in April or May, longlining, possibly Sitka Sac Roe and golden king crab could be underway. April and May are also very important months the commercial fleet spends readying gear and vessels for the upcoming summer season. We would imagine that these months are also vitally important to lodge owners and charter operations for the same reason.

Consider the workload for the department staff if a regional meeting is held during the month of March, April, or May. Some staff may be actively managing fisheries underway. Managers will likely be preparing for the upcoming salmon season, writing management plans, participating in Pacific Salmon Commission meetings, or diving for herring spawn deposition. Board Support is likely to be taking proposals for upcoming meetings. Board members may find that having meetings this late in the year would have an effect on their businesses.

Consider that the Board of Fisheries is a very public process. A meeting that is held that will knowingly marginalize public participation, regardless of circumstance, should not be considered. We would think public participation would be among the highest-ranking

considerations, because it literally defines the entire process. We have participated in process for years, and recognize how unique and precious it is.



Consider that local Advisory Committees have not been instructed as to how we will have meetings to consider the proposals for the upcoming meeting. Some of our board members and myself are active on our local AC's and have serious questions regarding this. AC meetings are public and must be notified. Virtual meetings are a possibility, but would require time and energy from Board Support. Platforms for virtual meetings aren't free for meetings that last for hours. While many of us have participated in virtual meetings, many in the general public have not, which may marginalize their ability to participate. It may also require facilitation by Board Support staff, which would mean overtime pay since most AC meetings are after business hours to facilitate participation. It would also require coordination of AC meetings within the region to facilitate staff, something that could be a real challenge.

Our position on the meeting in region hasn't changed. We would prefer to have the meeting as originally scheduled. If that is not possible, we would rather it be moved out a year, to January 2022, so a fully public process could be observed.

As always, we appreciate the opportunity to comment.

Regards,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch, Executive Director



Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-917-5470

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

October 12, 2020

Alaska Department of Fish and Game, Boards Support Section

Alaska Board of Fisheries

P.O. Box 115526

Juneau, Alaska 99811-5526

Re: October Work-session and Meeting dates

Dear Chair Carlson-Van Dort and the Alaska Board of Fisheries Members,

Southeast Alaska Fishermen's Alliance (SEAFA) would like to submit the following comments on topics and issues before you at the October work-session. We waited to submit comments until the Stock of Concern memo was available for including in our comments.

MEETING DATES for 2020/2021 CYCLE

SEAFA would still like to see the upcoming Board of Fish meeting cycle postponed for a year. The State of Alaska COVID cases have actually spiked higher than when the special meeting was held. We are still concerned that trying to hold a meeting will disenfranchise the public as you would limit the amount of participation at the actual meeting, either from individuals that are vulnerable, necessary restrictions to the amount of people that can actually attend the meeting (room capacity) and be in the room. The Ketchikan facility would limit the amount of participants below the normal number of attendees at the meeting.

The advisory committee process is a very important aspect of the Board of Fish public process. Southeast Alaska region has 23 of the 84 advisory committees. At the special meeting on what to do about the Board cycle, we did not hear a lot about the advisory committee process and how meetings can safely be conducted in a COVID 19 world.

In addition, moving the Southeast meeting date to late April conflicts with fisheries that are occurring during this time as commented by in on time comments. In addition, it is likely that the North Pacific Fishery Management Council (NPFMC) will still be holding meetings virtually in

April, if that is the case based on the recent meetings the two will overlap and impact participants of both processes as well as one of your board members.

SEAFSA reviewed the proposals submitted for the 2020/2021 Southeast meeting and there are a couple of commercial fishing proposals that deal with sunset dates that could be easily handled by extending the sunset date by one year until the board hears the proposals.

AGENDA CHANGE REQUESTS (ACR)

We reviewed the ACR's and only ACR 2 would impact southeast Alaska fisheries. We oppose the adoption of ACR 2 into a proposal. It does not meet the requirements to raise to the level of an ACR as based on ADF&G comments in RC 2. Additionally, ADF&G has the ability to manage with flexibility as shown this year and described in RC2.

STOCKS OF CONCERN

After reviewing the stock of concern memo, we believe that while it is a major concern that the stocks noted in Southeast Alaska are at this level and more stocks are being recommended for listing that ADF&G has the tools and ability to manage the stocks for one more year if the Board cycle was to be postponed for a year. For example, the action plan for the King Salmon River has the protections that would likely be implemented for the Taku chinook already built into it. Several of the stocks recommended to be listed are managed under Pacific Salmon Treaty stipulations which will take precedent and be built into an action plan.

NON REGULATORY PROPOSALS

The group a block of non-regulatory proposals dealing with Action Plans/Stocks of Concerns were submitted as proposals because the process of how to be sure that at a regions board cycle that previous action plans adopted for a stock of concern is reviewed. There needs to be a mechanism that when a stock of concern status is maintained that the adopted action plan is reviewed and possibly adjusted based on the information learned. SEAFSA submitted one of the action plan/stock of concern non-regulatory proposals because there is a built in contradiction that should be corrected. These action plans need to be revisited but can wait until an in person meeting is held and the proposals for the cycle are being heard.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a horizontal line extending to the right.

Kathy Hansen
Executive Director



October 14th, 2020

Alaska Board of Fisheries
ATTN: BOF COMMENTS
dfg.bof.comments@alaska.gov

RE: Board of Fisheries Work Session comments, upcoming meeting cycle

Members of the Alaska Board of Fisheries,

OBI Seafoods is one of the largest and most diversified seafood companies in North America. We operate 10 shorebased processing facilities in areas throughout the State of Alaska including Southeast, Prince William Sound, Cook Inlet, Kodiak, and Bristol Bay. Icicle Seafoods operates a shorebased processing facility in Dutch Harbor and a floating processor, both of which process groundfish primarily in the Bering Sea and Aleutian Islands. As sister companies, our processing facilities and our fishermen depend on regulatory stability and sustainable management of Alaska's fisheries resources.

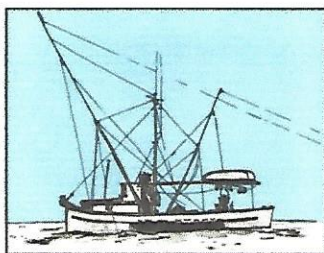
We would like to commend the Board of Fisheries and staff for adapting to an online format for the Work Session in light of the current pandemic. We recognize that it takes a lot of work and effort to switch from a long-established public meeting process to a virtual one and we thank you all for the ability to weigh in on the process moving forward. The BOF is known throughout fisheries management as one of the most public processes. Part of what makes the BOF process successful is the ability to hear from and meet face to face with the public as regulations are being discussed and adopted. Conversations with ADF&G managers, AC members, users and board members help create solid policy and successful management of Alaska's fisheries.

As such, we respectfully request that the BOF consider delaying the upcoming meeting cycle until a time where the board can meet in person with the public safely. Our number one priority as Alaskans must be the health and safety of our fellow meeting participants. For this reason, and due to the extreme public nature of BOF meetings, we urge the board to hold off on the upcoming cycle. It's unlikely that the current COVID situation will be resolved by March or April and large in-person meetings will be problematic if not impossible. Additionally, simply pushing the meeting cycles back a few months will result in significant overlaps with long-standing fisheries thereby limiting participation by the very members of the public who are needed to help shape decisions made by the board. Although there are time-sensitive issues such as stocks of concern and sunsets that need to be discussed, those proposals and issues can be dealt with on a case by case basis on a virtual platform.

Thank you for your time and attention to this important matter, and thank you for your service on the BOF.

Sincerely,

Julianne Curry
Public Affairs Manager
OBI Seafoods & Icicle Seafoods
Julianne.Curry@icicleseafoods.com
Cell 907.518.1822



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

October 14, 2020

Glenn Haight, Executive Director
Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: October 15 work session

Dear Mr. Haight,

Thank you for the opportunity to comment at this late date at your work session tomorrow.

We have recently been made aware of the Board of Fisheries proposal to reschedule the Southeast meeting to April 17th through April 29th of 2021, delaying the meeting until spring.

These dates are unsuitable for our participation at the Southeast Board of Fisheries meeting as many of our trollers will be involved in the longline fisheries open at that time. Others will be in the midst of boat preparation as not to miss the spring troll season which is due to open shortly thereafter.

We also believe that it is critical for an in-person, not virtual, Board of Fisheries meeting take place and realize COVID concerns will likely encumber the Board's workload for the next year or so.

Please keep in mind January is probably the best window for us as to not interfere with trolling or our supplemental fisheries. We would appreciate the ability to participate without significant economic consequences.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Amy Daugherty', with a long horizontal flourish extending to the right.

Amy Daugherty
Executive Director

From: [matthew donohe](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Alaska Trollers](#)
Subject: Re-Scheduling SEAK Finfish meeting
Date: Thursday, October 15, 2020 1:09:45 PM

To the BOF,

Dear Board Members,

I am the President of Alaska Trollers Association (ATA) an organization of around 400 members most of who live in SEAK. There are some 1000 troll fishing families living in this region. At the moment I am quarantined at home because of contact with a Covid infected friend. I only learned of his infection yesterday. I had hoped to stream today's BOF work session but the only internet available to me is a hot link via my phone. My access is inadequate for streaming. I live off the Sitka road system and because of the Covid quarantine I cannot go to town for a better internet connection.

This kind of internet limitation is common in rural SEAK. A virtual meeting will disenfranchise many SEAK residents.

It is my understanding that the BOF is considering rescheduling the SEAK BOF 2021 finfish meeting till April. April is a particularly difficult month for most of the troll fleet. At this time many in our fleet are engaged in a number of fisheries. We are also preparing our boats for the Spring hatchery access fishery and the summer season. Additionally I believe we will still be deep in the throws of Covid this April. **Even though ATA has important proposals before the Board I am asking the Board to consider skipping this round of BOF and live with the status quo till the next cycle.**

Yours
Matthew Donohoe
President Alaska Trollers Association
Ph 907-747-6255