

# On-Time Public Comment List

Alaska Board of Fisheries | March 8, 2021

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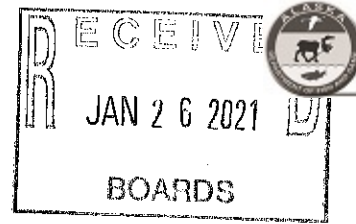
Ahtna Tene Nene'	PC01
Aleutians East Borough	PC02
Arthur Bloom	PC03
Bristol Bay Economic Development Corporation	PC04
Brooke Poirot	PC05
C T T Blomstrom	PC06
Charles Treinen	PC07
Chignik Intertribal Coalition	PC08
Concerned Area M Fishermen	PC09
Dennis Zadra	PC10
Icicle Seafoods	PC11
King Cove, City	PC12
Kodiak Seiners Association	PC13
Mark Roodbeen	PC14
Matt Alward	PC15
Nathan Tueller	PC16
North Pacific Fisheries Association	PC17
Norton Sound Economic Development Corporation	PC18
OBI Seafoods	PC19
Pacific Seafood Processors Association	PC20
Roni Carmon	PC21
Sand Point, City	PC22
Silver Bay Seafoods	PC23
Southeast Alaska Fishermens Alliance	PC24
Southeast Alaska Seiners	PC25
Thomas Murtha	PC26
Timothy Michael Murphy	PC27
Under Sixty Cod Harvesters	PC28
United Fishermen of Alaska	PC29

# On-Time Public Comment List

Alaska Board of Fisheries | March 8, 2021

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United Southeast Alaska Gillnetters.....	PC30
William Lindow .....	PC31
Yakov Reutov .....	PC32



January 21, 2021

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

To members of Boards of Fisheries & Game:

Ahtna Tene Nene" wishes to comment on future meetings of Alaska Board of Fisheries and Alaska Board of Game.

It is in Ahtna People's best interest that future ABOF and ABOG meetings be postponed until such time occurs when the public can meet in person.

Fisheries and game proposals will be addressed before both boards that may deeply affect our resources in the Copper River Region. Community Subsistence Hunt proposals and Copper River fisheries proposals will be brought before board members, and we may not be able to attend these meetings in person to voice our concerns.

We should be able to attend an in-person meeting without restrictions placed upon us, such as limiting number of people who may attend a public fisheries or game meeting, or to provide public testimony via phone call to board members.

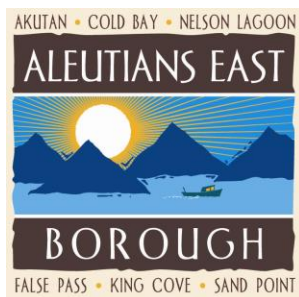
Providing written comments, phone calls to board members or limiting a number of people who can attend public meetings would jeopardize the public process of providing equal opportunity for all members of the public to attend a public meeting to voice concerns.

We also agree that absolute and necessary actions on fisheries and game regulations may still be made by board members and ADFG Department. ADFG still has EO on fish and wildlife resources. Renewing regulations such as antlerless moose hunt is still a board decision. All other regulatory matters that will affect fisheries on Copper River and subsistence hunts in our region should be put on hold for now, until such time as when we can meet in person.

Please consider postponing public meetings for now.

Sincerely

John Dye, Chair



March 2, 2021

Alaska Board of Fisheries

Sent via email to [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: Comments on rescheduling Board of Fisheries meetings postponed due to COVID

Dear Chair Carlson-Van Dort and Board of Fisheries,

The Aleutians East Borough requests the Board of Fisheries reconsider the plan to double up on Board meetings this coming year. We feel the plan to reschedule the 2020/2021 meetings into the 2021/2022 season while maintaining 2021/2022 cycle is untenable due to lack of funding and Department staff availability. We support moving all the cycles forward one year and rescheduling the postponed 2020/2021 meetings to this coming meeting season.

The Board decision of January 25<sup>th</sup> to double up meetings next year is in contrast to the general consensus at Joint Boards Committee meeting January 19<sup>th</sup>, and the subsequent Board of Game action to move all meeting cycles forward one year. We believe doubling up on meetings next year will put undo pressures on the Department staff and budget. We support a reasonable approach to reschedule meetings that neither impedes the Board's public process nor requires special legislative action. We do support the Board decision to strive to again hold regulatory meetings in person when conditions allow.

We are confident in the Department's demonstrated ability to continue to expertly manage fisheries, and your robust Board process including agenda change requests and emergency petitions is well suited to accommodate any pressing issues in the interim. Doubling up on meetings next year is not a fair request to Department staff, and funding for the plan will require special legislative appropriation. Please reconsider your decision to double up meetings for this coming meeting cycle.

Thank you for the opportunity to comment on the Board of Fisheries meeting schedule.

Sincerely,

Alvin D. Osterback, Mayor



Submitted By  
Arthur Bloom  
Submitted On  
3/1/2021 12:37:48 PM  
Affiliation

Phone  
9077897196

Email  
[artmbloom@gmail.com](mailto:artmbloom@gmail.com)

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4506 Prospect Way  
Juneau, Alaska 99801

I strongly oppose doubling up on meetings. There are many reasons this would be a poor decision.

# Bristol Bay Economic Development Corporation

P.O. Box 1464 • Dillingham, Alaska 99576 • (907) 842-4370 • Fax (907) 842-4336 • 1-800-478-4370



PC04  
1 of 1

March 2, 2021

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

Dear Alaska Board of Fisheries members,

Thank you for providing the opportunity to comment on the future meeting dates for the postponed 2020/2021 regulatory meetings and how it may impact the 2021/2022 meeting schedule.

The Bristol Bay Economic Development Corporation (BBEDC) is a Community Development Quota (CDQ) entity that represents 17 communities in the Bristol Bay region. Through investments in the Bering Sea fisheries, we are able to provide meaningful benefits to roughly 6,000 residents of the region, which includes assistance to local small-boat fishers.

The Bristol Bay salmon fishery is the largest in Alaska, and Alaska itself has thousands of stakeholders that may be impacted by regulatory decisions. Therefore, the Board of Fisheries should tread lightly when considering the potential impacts on stakeholders from doubling up meeting cycles. BBEDC **opposes** the doubling up of the two meeting cycles and would prefer that all meeting cycles get pushed back by one year, until in-person meetings can be conducted safely. Reason being, numerous stakeholders may not want to travel or attend large gatherings as new variants of the coronavirus are being discovered throughout the U.S. and Alaska. All of the newly discovered variants are currently believed to be more contagious, and the vaccines may be less effective against them. Until there is more information on this, it may deter stakeholders from attending in-person meetings, thus hindering the public process.

Furthermore, it seems unreasonable to believe ADF&G staff will be able to operate at the capacity necessary to conduct these meetings at the optimal level in which they are historically known for. For instance, the Board's recent decision to extend the call for proposals to May 10, 2021 may put a time constraint on ADF&G staff to evaluate proposals and provide staff comments. This would negatively impact Advisory Committees and stakeholders who rely on ADF&G staff comments to further educate themselves on proposals. Also, many of the stakeholders may participate in multiple fisheries, which will increase the cost for individuals to attend extra meetings, and create an unnecessary burden on the public to evaluate and comment on the additional proposals.

To conclude, BBEDC values the extraordinary public process that the Board of Fisheries is known for, and does not believe that the doubling up of the two meeting cycles does the stakeholders, managers, and board members the due diligence they deserve. We advocate that all meeting cycles get pushed back by one year and that the call for proposals is extended from May 10, 2021 to April 11, 2022. The risk posed to the public process and people's health in general is simply too great.

Thank you for your time and consideration,

Norman Van Vactor  
Chief Executive Officer



Submitted By  
Brooke Poirot  
Submitted On  
3/1/2021 12:29:54 PM  
Affiliation  
Commercial Fisherman

My name is Brooke Poirot and I am writing to ask that the Board of Fish postpone the meeting cycle by one year to allow the normal meeting cycle to continue without doubling up on meetings. It is unfair to those who will be affected by these meetings. There is a reason these meetings are spaced out so that the public, Fish and Game and the Board itself have enough time and resources to give them the attention and work they require. I think the most reasonable option is to keep the meeting schedule as is and just push subsequent meetings in the same manner.

Thank you for your time.

Brooke



Submitted By  
C T t blomstrom  
Submitted On  
1/30/2021 7:09:14 AM  
Affiliation  
Sport fisherman

Phone  
5124228328

Email  
[tblomstrom@yahoo.com](mailto:tblomstrom@yahoo.com)

Address  
700 lake rd,  
coldspring, Texas 77331

Amend the rule on limits of sockeye caught by rod and reel to say that the legal limit shall be the first limit caught shall be the limit set by the "board" regardless of where the fish is hooked.

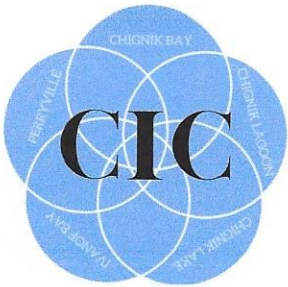
Too many fish caught other than the mouth die thereby wasting the resource





Submitted By  
Charles Treinen  
Submitted On  
3/1/2021 10:41:30 AM  
Affiliation

Doubling up on the meeting schedule for the 2021/2022 meeting cycle puts an undue burden on the public that will limit and compromise the public's opportunity to participate in a given meeting. It also puts an undue burden on the department to produce more complete analyses when we need them to deal with day to day management issues.  
Please consider the reasonable option of setting the whole schedule back by one year.



**CHIGNIK INTERTRIBAL COALITION**  
**427 AIRPORT ROAD**  
**CHIGNIK LAGOON, ALASKA 99565**



PC08  
1 of 1

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

March 2, 2021

RE: **Meeting schedule 2021/2022**

Dear Members of the Alaska Board of Fisheries,

Chignik stakeholders including commercial and subsistence fishermen and Chignik's five villages acknowledge and support the current Board plan of doubling next year's meeting schedule. We are greatly concerned over the prospect that the Area M/Chignik Board of Fisheries meeting could be postponed by a year. In two of the last three years Chignik has not had a sockeye fishery and based on the FRI and ADF&G forecasts it is probable that there will not be a 2021 fishery either. Equally concerning is that Chignik's Chinook and sockeye escapements have never been lower, with minimum escapement goals unachieved in recent years. In Chignik's fishing history never has there been such a collapse of both its sockeye salmon runs. Chignik is in economic and cultural peril. Time is not on our side. We believe it is critical that the Alaska Board of Fisheries address the Chignik issue of failed sockeye production and sustainability at the earliest opportunity possible.

The coalition has been made aware by ADF&G's Westward Region staff that they are constrained by existing Area M regulations in limiting the impact of the Dolgoi Island area fishery and the Shumagin Islands fishery on Chignik-bound sockeye salmon irrespective of our chronic escapement shortages. This is alarming. Chignik's two sockeye runs are at stake and we believe the 2022 Area M/Chignik Board of Fisheries meeting is imperative based on the trajectory of forecasts and the Boards sustainable salmon fisheries policy.

Respectfully, we ask the Board to maintain the Area M/Chignik Board of Fisheries meeting of February 18-23, 2022.

A handwritten signature in black ink, appearing to read 'George Anderson'.

George Anderson

Chignik Intertribal Coalition, President



Submitted By  
Steve Brown  
Submitted On  
3/1/2021 11:35:49 PM  
Affiliation  
Concerned Area M Fishermen

Phone  
9072352631  
Email  
[fvgeon@gmail.com](mailto:fvgeon@gmail.com)  
Address  
35717 Walkabout Rd.  
Homer, Alaska 99603

Concerned Area M Fishermen (CAMF) asks that the Board of Fisheries reconsider its earlier decision to hold the postponed 2020/2021 meeting schedule during the 2021/2022 cycle. CAMF had earlier requested that the Board move all meetings back by one year, and we continue to feel the public will best be served with this course of action. There will be less demand on ADF&G staff, the Advisory Committees, and the public. In addition, this will keep the Boards of Game and Fisheries more closely lined up in their joint business. The Board may still consider emergency issues under its existing agenda change/out of cycle policy.

Sincerely,

Steve Brown, President



Submitted By  
Dennis Zadra  
Submitted On  
3/1/2021 6:00:19 PM  
Affiliation

Phone  
907-253-3718

Email  
[dennis@idohuntak.com](mailto:dennis@idohuntak.com)

Address  
PO Box 2348  
Cordova, Alaska 99574

I am opposed to the Board of Fish moving the 2020/2021 into the 2021/2022 meeting cycle without moving the 2021/2022 cycle into 2022/2023. This doubling up of meeting cycles would be very problematic for everyone involved and would especially affect the PWS fisheries. It would be equitable to push back all meeting cycles until which time we can return to in-person meetings.



March 2<sup>nd</sup>, 2021

Alaska Board of Fisheries  
Via email submission  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Upcoming meeting cycle comments, support delaying all upcoming meetings**

Alaska Board of Fisheries members,

Icicle Seafoods operates a shorebased processing facility in Dutch Harbor and a floating processor in the Dutch Harbor area, both of which participate mainly in the pollock and cod fisheries in the Bering Sea and Aleutian Islands. With a long history of dependence in these fisheries, our processing platforms, employees, and independent harvesters depend on regulatory stability and sustainable fisheries management. Alaska produces some of the most sustainable and sought-after seafood in the world and we pride ourselves on being a contributor to Alaska's economy since 1965.

Icicle Seafoods is joining many other Alaskans in our request that the Board of Fisheries rescind their previous decision to stack the upcoming meeting cycles. This decision was made against the vast majority of the public comments and ADF&G input on the feasibility of adopting the unattainable schedule. Although we commend the BOF for adapting to an online format to handle specific issues in light of the current pandemic, we are critically concerned with the unavoidable consequences that a stacked meeting cycle will create.

In addition to the increased cost of doubling up on the meeting cycle, many other issues will arise that will collapse the public's trust and reduce their participation in the process. Local AC's will be disenfranchised when they are forced to double their workload in an attempt to respond to twice the number of BOF meetings. For the Bering Sea and Aleutian Islands, local AC's are the only way for many members of the public to meaningfully provide input on important proposals and actions. Harvesters throughout the State of Alaska participate in multiple fisheries in various regions. Throwing off the cycle by stacking does more than just double the number of meetings, it also shifts when those meetings are traditionally held. Stacking the cycles would reduce the ability of our fishermen to contribute if a meeting overlaps with a long-standing fishery. Further, doubling meeting cycles can create an inequity between regions.

A doubled meeting cycle will also work to erode the trust of the public and severely burden ADF&G and board support staff. The BOF is known for being public and transparent, however with a stacked cycle less ADF&G staff will be able to prepare and attend which will reduce the science in science-based decision making. As long-time BOF meeting participants, we can't support a meeting schedule that will double the yearly workload for BOF staff, or BOF members. This unsustainable schedule also places a heavy burden on the public to be able to understand and comment on double the number of proposals in one cycle and would create an excessive cost to attend the relevant meetings.

In closing, we respectfully request that the BOF reconsider stacking the upcoming meeting cycle, and instead adopt the recommendation of the vast majority of the public and ADF&G to just delay all future meeting cycles.

Thank you for taking the time to consider the comments of stakeholders as you reconsider this decision.

Sincerely,  
Chris Pugmire  
Icicle Seafoods General Manager  
[chrisp@icicleseafoods.com](mailto:chrisp@icicleseafoods.com)

ICICLE SEAFOODS, INC.  
Tel: 206-282-0988  
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*Office of the Mayor*

March 2, 2021

Alaska Board of Fisheries  
Sent via email to [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: Comments for the March 8, 2021 meeting to reschedule meetings

Dear Chair Carlson-Van Dort and Board of Fisheries,

The City of King Cove asks that you reconsider your January 25<sup>th</sup> decision to reschedule the 2020/2021 meetings, postponed due to COVID, into the 2021/2022 season while maintaining 2021/2022 cycle and future cycles as scheduled. We feel the plan is untenable due to lack of funding and staff availability. The City of King Cove suggests that you adjust all the cycles forward one year, rescheduling the postponed meetings to this coming meeting season.

We were surprised at your January decision to double up meetings next year, in contrast to the Joint Boards Committee general consensus to delay future schedules, and the Board of Game action to move all meeting cycles forward one year. Doubling up on meetings next year will put extreme pressures on the Department and public that participate in your process. The City of King Cove supports taking appropriate time and reasonable measures to the reschedule meetings.

We feel that the Department does a stellar job of managing the fisheries and will continue to do so if the Board takes extra time to move through the cycles. We also feel that the robust Board process including agenda change requests and emergency petitions can accommodate pressing issues in the interim. Doubling up on meetings next year is not a fair request to Department staff and funding for the plan is uncertain at best. Please reconsider your decision to double up meetings this coming meeting cycle. The City of King Cove supports adjusting your meeting cycle forward one year.

Thank you the opportunity to comment on the Board of Fisheries meeting schedule.

Sincerely,

Mayor, City of King Cove



Submitted By  
Nate Rose  
Submitted On  
3/1/2021 10:36:51 PM  
Affiliation  
Kodiak Seiners Association

Phone  
9076544323  
Email  
[kodiakseiners@gmail.com](mailto:kodiakseiners@gmail.com)  
Address  
PO Box 8835  
Kodiak, Alaska 99615

Kodiak Seiners Association

PO Box 8835

Kodiak, AK 99615

February 28, 2021

Glenn Haight

Executive Director

Boards Support Section

PO Box 115526

Juneau, AK 99811-5526

Dear Mr. Haight and members of the Alaska Board of Fisheries:

The Kodiak Seiners Association (KSA) represents over 120 Kodiak salmon purse seine permit holders. We would like to request the Board reconsider the decision to roll the regularly scheduled Board of Fisheries meetings for the 2020/2021 cycle into the 2021/2022 instead of postponing the entire 3-year meeting schedule by one year, as was done by the Board of Game.

The Alaska Board of Fisheries and the Board process is one of the fundamental reasons why we as stakeholders of Alaska's salmon resource have enjoyed a sustainable livelihood for generations of fishermen. The process allows for public input and the ability of the board to spread out meetings for the different areas around the state in order to gauge whether changes made to a fishery result in the intended purpose of the proposals driving the change, and in addition give the board an opportunity to alleviate unknown and adverse consequences as a result of regulatory changes. The 3-year meeting cycle also allows for Board members to fully engage with the public as well as fully prepare and attempt to understand a management plan or the design behind regulations before they have to vote on making changes to those plans. By attempting to hold 2 years of meetings within a single year makes it extremely difficult for Board members to fully understand the proposals of each area and conduct the necessary amount of research to fully grasp the affects those proposals would have on each fishery.

In addition, the Board, by attempting to roll 2020/2021 meetings into 2021/2022 will create an immense burden on ADFG staff, taking away valuable and essential time that should be devoted to managing fisheries to uphold the high standard of sustainability these fisheries are known for. This ask of ADFG staff also comes at an increased cost, a cost that would be better served funding weirs or aerial surveys to better manage Alaska's fish resources.

Lastly, the opportunity for stakeholders to give input into the board process is significantly hampered under the proposed schedule. The

public process allows the board to utilize some of the most important sources of information and data, the fishery decisions. To stack so many meetings into one cycle will make it extremely difficult for affected stakeholders to participate in the public process.



KSA respectfully requests the Board reconsider its previous decision to stack the meetings of 2020/2021 into 2021/2022 and instead postpone the entire 3-year schedule by one year in order to give the resource and the stakeholders the due consideration given these unprecedented times.

Sincerely,

Nate Rose

KSA President





Submitted By  
Mark Roodbeen  
Submitted On  
1/29/2021 4:36:41 PM  
Affiliation

~Any chance to increase the sport fishing limit on rockfish for 2021?

There was limited sport fishing in 2020 due to Covid and it appears 2021 may well have limited pressure also.



March 1<sup>st</sup>, 2021  
Matthew Alward  
60082 Clarice Way  
Homer, AK 99603

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

**Re: 2020/2021 and 2021/2022 meeting cycle scheduling**

Dear Chairman Carlson-Van Dort and Board of Fisheries members,

I am a commercial fisherman based out of Homer and I have been participating in the Board of Fisheries (BOF) process for years. I appreciate this opportunity to comment on the March 8<sup>th</sup>, 2021 Special Meeting regarding the 2021/2022 meeting schedule. I strongly encourage you to reconsider your decision at the January 25<sup>th</sup> Special Meeting to add the 2020/2021 meeting cycle to the 2021/2022 schedule and instead ask that you push all future meeting cycles back one year.

By combining two meeting cycles into one you have created an inequity between regions. The public, Advisory Committees (AC's), and The Alaska Department of Fish and Game (ADF&G) have made it clear that none of them have the capacity to give their full attention to double the proposals in one cycle which will take away from the strong public process of the BOF for the regions that are proposed to be taken up in the 2021/2022 meeting cycle. At the same time Upper Cook Inlet, Lower Cook Inlet, and Kodiak will have a normal meeting schedule and will thus have the full attention of BOF members, ADF&G, AC's, and the public. As a member of the public, I cannot comprehend how as voluntary board members with personal and work lives you will be able to give your full attention to twice the number of proposals in one cycle. Without equal attention to all regions of the state the strong BOF process is compromised.

ADF&G has made it clear that they do not have the funding or staffing to analyze and comment on the proposals from a double meeting schedule let alone attend all the meetings. The Memorandum from ADF&G Board Support Section dated February 24, 2021 states that "The Alaska Department of Fish and Game (ADF&G) proposed a budget increment for FY22 through the Governor's Amended FY22 budget (February 17, 2021) to accommodate the board decision to double up on meetings next fiscal year. This was done despite concerns ADF&G voiced over this approach. A decision was made to not include this request as part of the Governor's amended budget proposals for FY22." That leaves the legislature as the only body that can add funding to ADF&G's budget which seems unlikely given the fiscal situation of the state. If ADF&G cannot attend all the meetings or give their full attention to all the proposals, then the BOF process is broken.

I respectfully ask that you reconsider your January 25<sup>th</sup> decision and move all meeting cycles ahead one year and restore the public's faith in the BOF and the strong public process that all Alaskans depend on.

Sincerely,

Matt Alward

Owner-Alward Fisheries LLC



Submitted By  
Nathan tueller  
Submitted On  
3/1/2021 2:04:16 PM  
Affiliation

I oppose doubling up the meeting cycle this year.



Est. 1955

**North Pacific Fisheries Association**  
**P.O. Box 796 · Homer, AK · 99603**  
**npfahomer@gmail.com**

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PC17  
1 of 1

3/1/21

RE: Alaska Board of Fisheries Special Meeting, March 8, 2021  
Rescheduling Options

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

The North Pacific Fisheries Association (NPFA) is a commercial fishing organization based in Homer, Alaska, representing more than sixty family fishing operations utilizing a variety of gear and vessel types. Our members participate in many fisheries throughout Alaska, from Southeast to the Bering Sea, in both state and federal waters. NPFA was founded in 1955 and has been involved with the Alaska Board of Fisheries since its inception. We are very familiar with state management processes, with a long history of engagement with the Board and on local Advisory Committees.

**NPFA urges the Alaska Board of Fisheries to reconsider the decision to double up the schedule and recommends postponing the entire Board Cycle for one year.**

The public process of the Alaska Board of Fisheries is instrumental in making the States resources available for maximum use consistent with the public interest as laid out in Article 8 of our State Constitution. In our opinion a doubled up schedule puts an undue burden on the Department of Fish & Game, Board Support, Advisory Committees, engaged fishing organizations similar to our own and the public at large. The costs of participating in a normal cycle are challenging and a double schedule will almost certainly disenfranchise some participants and undermine the integrity of the process. NPFA only supports hearing proposals with imminent time sensitive conservation needs and those can be considered through the Agenda Change Request process. Please reconsider the previous decision and postpone the board cycle one year.

Respectfully,

G Malcolm Milne  
President, North Pacific Fisheries Association



*Brevig Mission Diomede Elim Gambell Golovin Koyuk Nome Saint Michael Savoonga Shaktoolik Stebbins Teller Unalakleet Wales White Mountain*

February 22, 2021

Ms. Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
c/o Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Letter of Support for the Closure of the 2021 Norton Sound Commercial Red King Crab Fishery

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

Norton Sound Economic Development Corporation (NSEDC) represents 15 member communities in the Norton Sound region ranging from Stebbins to Wales, including those on Little Diomede and St. Lawrence islands. Revenue from our Bering Sea fisheries operations is used to provide economic development through education, employment, training, and financial assistance to these member communities. NSEDC has made substantial investments in processing and tendering infrastructure and jobs, and the development of markets for Norton Sound red king crab (NSRKC) harvested by member residents. NSEDC is also heavily involved in the research and scientific support of the NSRKC fishery through both our staff scientists' work and research funding provided to other entities. Residents of our member communities are heavily dependent on NSRKC for customary and traditional subsistence uses. We therefore have multiple reasons to be concerned about the long-term health and trajectory of the stock.

Since the NSRKC stock's dramatic collapse in 2019, NSEDC has not purchased red king crab from local fishers and has strongly advocated for strict conservation measures, including closures to allow the male spawning biomass to adequately rebuild to pre-2019 levels. More recently, the North Pacific Fishery Management Council (NPFMC) chose to increase the OFL/ABC buffer to 40% based on its Scientific and Statistical Committee's (SSC) findings and the testimony from the public, including NSEDC. In fact, most of the region's affected stakeholders do not feel the stock in its current state can withstand any level of commercial harvest in 2021, let alone the 314,000-pound guideline harvest level (GHL) established by the Alaska Department of Fish and Game (ADF&G; department). As such, NSEDC fully supports the emergency petition submitted by the Northern Norton Sound Fish and Game Advisory Committee (NNSAC) to the Alaska Board of Fisheries (BOF) for an emergency closure of the 2021 NSRKC commercial fishery.

While this letter will go into more detail on our reasoning for the request, in succinct terms, we believe the department should curtail commercial fishing for another year to allow this stock to more fully recover for the following reasons:

- The GHL has been set based on a model that tends to overestimate the number of legal male crab.
- The scarcity of larger male crab is placing the burden of reproduction on smaller crab, thus



limiting their ability to grow to legal and/or market-preferred sizes.

- Commercial fishing pressure on the few emerging legal-size crab will imperil the stock's future ability to reproduce.
- The scarcity of market-size crab will lead to high levels of discards in the commercial fishery and impose increased mortality on the stock.

We believe there has been an over reliance on the fishery's model outlook in establishing the GHL. This is confounding considering the collapse of the mature male biomass and related low fertilization rates of females observed in 2019, established knowledge of NSRKC growth patterns, and more recent size composition from the 2021 subsistence fishery that contradicts the model's rosy outlook.

At a recent public meeting with NSEDC, department staff stated that they estimated approximately 93% (3.64 million pounds) of the legal male biomass (LMB) was projected to reach the industry-preferred size ( $\geq 5$  inches in carapace width (CW)) in 2021. Not only do we think the projected LMB estimate is an overestimate, the assertion that the vast majority of legal crab are of industry-preferred size seems unrealistic based on all the available information. During the 2020 ADF&G trawl survey, 134 males were caught and sampled, and only 10% were of legal size ( $\geq 4.75$  inches CW). There was another 16% that were one molt increment shy of recruiting to legal size, 40% that were 2 molt increments away from legal size, and 34% were at least 3 molt increments away from legal size. It therefore seems highly unlikely given the 2020 size composition data that, even under exceptional growth conditions, that 93% of the 2021 LMB would have attained the larger size preferred by the industry. In reality, it is more likely that only a small fraction of the LMB will have reached the industry-preferred size for 2021.

Stakeholder skepticism with the department's projected estimate of market legal crab has been most recently validated by 2021 winter subsistence fisher reports from the crab spawning grounds. These reports are characterized as having high levels of discarded sublegals, a high prevalence of old-shell males, and a correspondingly low occurrence of legal males. Quite simply, the spawning stock is comprised largely of sublegal and/or barely legal males, many of which display old-shell condition and are below the industry-preferred size. This is presumably due to strong selection pressure to mate, due to a lack of recruit or larger males, requiring allocation of energy toward reproduction thereby preventing them from growing to larger size.

Ramping up commercial harvest pressure now, given the current stressed state of the mature male brood stock, could do lasting damage to the stock and both the subsistence and commercial fisheries by increasing handling mortality of unmarketable crab and creating a situation where small crab are given a greater probability of reproducing. Banking these smaller-than-market-size males for at least another year will ensure they attain larger size and higher market value before they are eventually harvested. Additionally, NSEDC has spent the last two decades building a market for locally caught crab sections and live crab, and it is already challenging to develop a robust high-value market using crabs of the current industry-preferred size. A combination of a reduced retained size and higher than average old-shelled crab could impart both short-term and long-term negative impacts on the NSRKC brand that could devalue the resource.

Foregoing another year of commercial harvest will also provide the best chance of rebuilding a spawning stock biomass with a varied assortment of age and size classes of mature males. Major benefits of a more robust spawning mature male biomass (MMB) are reduced inter-annual fishery dependence on annual recruitment, and improved chances that there will be adequate numbers of viable males available to successfully mate with future cohorts of mature females.

NSEDC, as the sole NSRKC processor, elected to not purchase red king crab in 2020 to protect the stock's



spawning biomass so that it could be rebuilt to levels that support sustainable harvests. Thankfully, the BOF agreed with these concerns in 2020. Due to the ongoing concerns identified in this letter, NSEDC has opted to again not purchase crab in the 2021 commercial winter fishery and is imploring the BOF to again close the fishery prior to the summer.

We are hopeful the BOF will give serious consideration to the petition submitted by the NNSAC and are more than willing to be present to provide any further information or answer any questions BOF members may have when they consider the request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wesley Jones'.

Wesley Jones  
Norton Sound Fisheries Research and Development Director

cc Doug Vincent-Lang, Commissioner, ADF&G



March 2<sup>nd</sup>, 2021

Alaska Board of Fisheries  
ATTN: BOF COMMENTS  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: RE-CONFIRM SUPPORT for delaying all meetings cycles by one year**

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 operating in every major region throughout the State of Alaska including Southeast, Prince William Sound, Cook Inlet, Kodiak, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of Alaska's fisheries resources.

The Board of Fisheries is known for having one of the most public processes for fisheries management in the country and is the most public process of any regulatory body in the state. Part of what makes the BOF process successful is the ability to hear from and meet face to face with stakeholders 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 sustainable fisheries. Soliciting meaningful input from ADF&G is one of the cornerstones of the BOF's science-based approach to decision making.

**As such, we respectfully request that the BOF re-consider the decision to stack the upcoming meeting cycles, and shift all meeting cycles by one year as requested by the vast majority of the public, AC's, and ADF&G.** We are very grateful to the BOF for the vote to delay the current meeting cycle by one year to protect the health and safety of the public participants, staff, and yourselves. However, stacking the upcoming meeting cycles would result in an unsustainable number of meetings in the next cycle and would severely disenfranchise the public. A stacked cycle 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. Further we are very concerned with the ability of BOF staff, ADF&G, and board members themselves to adhere to the aggressive schedule that would be established under the stacked cycle.

Until we can convene in person meetings, the BOF can extend regulations in place for the 2020 season through the 2021 season. Additionally, we support the adoption of proposal #276 to extend the sunset provisions by one year in the Northern Southeast Seine salmon fishery management plan and the Deep Inlet and Anita Bay Terminal Harvest Area Management Plans.

Thank you for your time and attention to this important matter and for your public service as a member of this vital board.

Sincerely,

A handwritten signature in black ink, appearing to read "Julianne Curry".

Julianne Curry  
Public Affairs Manager  
OBI Seafoods  
[Julianne.Curry@obiseafoods.com](mailto:Julianne.Curry@obiseafoods.com)





March 1, 2021

Alaska Board of Fisheries  
Chair Carlson-Van Dort  
Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: On-time comments for 2021/2022 Alaska Board of Fisheries revised meeting schedule

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) meeting scheduled for March 8. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing shorebased seafood processing businesses and their investment in coastal Alaska and sustainable commercial fisheries. At its January 25, 2021 special meeting, the Board determined it would add its 2020/2021 regulatory meetings to its next meeting cycle, and essentially double up meetings in 2021/2022. **PSPA opposes doubling up the meeting cycles for public process reasons, in addition to the current proposal being unfunded. We respectfully request that the BOF revisit this decision and delay their meeting cycle one year until it is acceptable to hold in-person meetings.**

The Board is highly dependent on a strong public process and staff expertise, and a meeting cycle that attempts to address so many areas in one cycle significantly weakens the ability to get the benefit of both. Such a schedule is not realistically tenable for the public to be able to adequately participate, nor will staff have sufficient time to review proposals and provide needed input to the Board, let alone attend all meetings. It also increases the demand on the Advisory Committees and weakens their ability to work through proposals in detail and provide thorough recommendations to the Board. The proposed schedule creates a notable inequity between regions and is not conducive to a robust process or resulting decisions.

In addition, the memo from Haight to the Board (dated Feb 24, 2021) makes clear the added expense of \$442,500 required to hold double meetings, which is not funded in the Governor's proposed FY22 budget. While an increment could be requested to support such a schedule, PSPA strongly feels that any addition to the ADFG budget should fund fisheries projects, to provide additional research, inseason management, and/or access to fisheries consistent with the department's mission. More importantly, new funding does not allay the public process concerns outlined above.

In sum, the Board of Fish serves a critically important purpose and affects thousands of Alaskans, fishing and processing businesses, and livelihoods across the state. Regulatory proposals are often complex, with impacts that span a wide range of fisheries and stakeholders. Given this, decisions of the Board should not be rushed or proposals inadequately reviewed, and the Board needs the full participation of the public and ADFG staff. Please continue to support affected Alaskans and the public process on which you rely so strongly, and reconsider the decision to double up the meeting cycle in 2021/2022.



Thank you for the opportunity to comment.

Sincerely,

*Nicole S. Kimball*

Nicole Kimball  
PSPA – VP Alaska



Submitted By  
Roni Carmon  
Submitted On  
1/30/2021 1:33:48 PM  
Affiliation  
None

Phone  
9079530238

Email  
[Dallasak789@hotmail.com](mailto:Dallasak789@hotmail.com)

Address  
51995arness rd  
Kenai, Alaska 99611

My proposal: to collect a stamp , to put on a fishing license. Of 150.00 per person to pay to fish Alaskan south center waters. To pay for ,a Alaskan resource. Fished by guides ,and charter boats. The Alaskan resource , they did not pay for, has now become ,44 billion 70 million . This fish price need to be collected in order to restore our government needs . Until then no fish should be fished by guides or charter boats. This fish has already been taken without licensed guides and charter boats,over the last 30 years. And the 44 billion is very low estimate. However the 20 thousand box stores , that exploit our waters in south central.. could easily pay back , Alaska for this fish! It's a good idea.and Alaskan adfg should be ashamed for the over site,of weak legislature,and lobbyists payoff. Please do a yearly 150 00 stamp for anyone out of state ,out of county foiegn , and in state. Fish Yearly Stamp.

This money will be used to pay government. Operating cost. Instead of the permanent fund to pay adfg employees. Adfg should earn its own wage ,by fishing resources only. They currently drawn a wage as state employees. This should not be the case. The adfg employees and this government agency . Should be paid on there merit of the fishery they control only . Not oil income.

Working for a better balanced budget. Our state myay survive a few more years before we become bankrupted.



March 2, 2021

Alaska Board of Fisheries

Sent via email to [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: Comments for the March 8, 2021 meeting to reschedule meetings

Dear Chair Carlson-Van Dort and Board of Fisheries,

The City of Sand Point asks that you reconsider your January 25<sup>th</sup> decision to reschedule the 2020/2021 meetings, postponed due to COVID, into the 2021/2022 season while maintaining 2021/2022 cycle and future cycles as scheduled. We feel the plan is untenable due to lack of funding and staff availability. The City of Sand Point suggests that you adjust all the cycles forward one year, rescheduling the postponed meetings to this coming meeting season.

We were surprised at your January decision to double up meetings next year, in contrast to the Joint Boards Committee general consensus to delay future schedules, and the Board of Game action to move all meeting cycles forward one year. Doubling up on meetings next year will put extreme pressures on the Department and public that participate in your process. The City of Sand Point supports taking appropriate time and reasonable measures to the reschedule meetings.

We feel that the Department does a stellar job of managing the fisheries and will continue to do so if the Board takes extra time to move through the cycles. We also feel that the robust Board process including agenda change requests and emergency petitions can accommodate pressing issues in the interim. Doubling up on meetings next year is not a fair request to Department staff and funding for the plan is uncertain at best. Please reconsider your decision to double up meetings this coming meeting cycle. The City of Sand Point supports adjusting your meeting cycle forward one year.

Thank you for the opportunity to comment on the Board of Fisheries meeting schedule.

Sincerely,

Jordan Keeler, City Administrator



March 2, 2021

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811  
Submitted via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Comments on BOF Meeting Cycle & Proposal 276

Dear Chairwoman Carlson-Van Dort and Alaska Board of Fisheries Members:

Silver Bay Seafoods is a vertically integrated, primarily fishermen-owned processor of salmon, herring and other seafoods products. Silver Bay began in 2007 as a single salmon processing facility in Sitka, Alaska, and has since grown into one of the largest seafood companies in Alaska. Silver Bay has state of the art, high volume processing facilities throughout Alaska, currently operating in Sitka, Craig, Valdez, Naknek, False Pass, and Kodiak. Our company and fishermen owners appreciate the opportunity to offer comments to aid your decision about the board of fisheries meeting cycle and sunset regulations in front of the board.

**We want to reiterate our opposition for combining the 2020/2021 and 2021/2022 board meeting cycles.** We appreciate your decision to postpone this year's regulatory cycle. However, we ask that you also postpone future meeting cycles by one year. We respect the board's desire to get things back on track, but this stacked approach would seriously disenfranchise stakeholders. Additionally, the Department of Fish and Game (ADF&G) has been clear that they do not have the financial or personnel resources to support this kind of schedule. With stakeholder input unnecessarily compromised and ADF&G limited in its ability to present data, Alaskan's would be left without the regulatory system that traditionally based decisions on broad public input and the best available science.

While postponing the meeting cycles seems to be the most reasonable and broadly supported approach, we recognize that some critical issues require attention. In particular, we ask the board to ensure regulations in place for the 2020 season be extended through the 2021 season, and until we can convene in person meetings. **We support adoption of proposal #276 to extend the sunset provisions by one year in the Northern Southeast Seine salmon fishery management plan and the Deep Inlet and Anita Bay Terminal Harvest Area Management Plans.**

We operate in nearly every region of the state and have considered and discussed with our fishermen partners the impacts to current and future cycles. We believe that ADF&G and the Board of Fisheries have several tools available to address unforeseen conservation issues outside of regularly schedule board meetings. With this in mind, we do not expect negative impacts from postponing current and future board cycles.

Thank you again for the opportunity to comment.

Respectfully,



Abby Fredrick  
Director of Communications



# Southeast Alaska Fishermen's



PC24  
1 of 2

1008 Fish Creek Rd

Juneau, AK 99801

Email: [kathy@seafa.org](mailto:kathy@seafa.org)

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-917-5470

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

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March 2, 2021

Alaska Department of Fish & Game

Boards Support Section

PO Box 115526

Juneau, AK 99811

RE: SUPPORT PROPOSAL #276 – SE AK Cycle Sunset Dates and Dates of 20-21 meetings

Dear Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFSA) is a non-profit membership organization representing our 330+ members involved in the salmon, crab, shrimp and longline fisheries. Within our salmon division we have members with troll, gillnet and seine permits for SE Alaska.

We support adoption of proposal #276 to extend the sunset provisions by one year in the *Northern Southeast Seine salmon fishery management plan* and the *Deep Inlet and Anita Bay Terminal Harvest Area Management Plans*. These management plans with a sunset date were an industry consensus ([RC 153](#)) concerning a whole suite of proposals and extending them is the fairest solution until the meeting for the Southeast cycle is held.

SEAFSA sincerely hopes that you revisit your decision from the January 25<sup>th</sup> meeting regarding meeting schedules. Trying to conduct two-years' worth of meetings in one year (doubling up) does an injustice to the Board of Fish process. The overwhelming number of comments from the public and advisory committees showed support for moving all cycles back one year. In addition, funding for a doubled-up meeting schedule is unlikely to be funded through the legislature and the Alaska Dept of Fish and Game (ADF&G) does not have any extra funding to support a doubled-up meeting. ADF&G has also expressed concerns about the ability of the staff to participate and do justice to a doubled-up schedule. Now would be the time to drop the idea of a double- up meeting, withdraw the call for proposals and proceed with the 20-21 PWS & SE cycle in 2021-22 and move all future meetings back a year. Since the Board of Fish is



a citizen member board, it might be difficult for board members to fulfill their regular job duties and service on other boards with a doubled-up cycle.

In the memorandum dated February 24 from Glenn Haight, Executive Director for Alaska Board of Fish on page 4 the memo talks about “ongoing fisheries and hunts” that might be a conflict to meeting dates. **We would like to point out that for Southeast Alaska not mentioned you have the Dungeness crab and pot Shrimp fisheries starting on October 1<sup>st</sup> and the tail end of the longline seasons, as well as the dive fisheries mentioned that must be considered in setting a date for the Southeast meeting.**

Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathy Hansen", followed by a horizontal line.

Kathy Hansen  
Executive Director



P.O. Box 714  
Ward Cove, AK 99928  
(907) 220-7630  
[info@seiners.net](mailto:info@seiners.net) [www.seiners.net](http://www.seiners.net)

February 26, 2021

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

**Re: March 8, 2021 BOF Meeting**

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

Southeast Alaska Seiners Association (SEAS) has advocated for the past 53 years on behalf of commercial fishermen, the resource, and the communities we live and work in. We appreciate the Board generated proposal 276 that extends the sunset dates of three of our fishing areas through the 2021 season, and are in **favor** of passing this language.

Regarding the meeting schedules moving forward, we stand by the previously articulated views that a January 2022 meeting date is the best choice for all concerned for the Southeast and Yakutat Finfish and Shellfish meeting. I understand that the dates of January 4 – 16, 2022 are being proposed, and we would support that time frame.

Respectfully,

Susan Doherty  
Executive Director SEAS





Submitted By  
Thomas Murtha  
Submitted On  
3/2/2021 10:12:41 AM  
Affiliation  
CAMF

Phone  
575 447 1727

Email  
[murthax2@yahoo.com](mailto:murthax2@yahoo.com)

Address  
po box 51  
Eagle Nest, New Mexico 87718

Doubling up of Board meetings in 2021-2022

gillnetter I attended combined meetings in the 1990's that lasted 2 weeks and once 3 weeks long. This did not serve Board members or fisherman well, by the time proposals were voted on everyone was burned out. I hope you will see that giving these issues the attention they deserve is more important than being .able to get them off your calender. I ask that you give strong consideration to not doubling up Board meetings in 2021-2022 . Thank you for your time Tom Murtha

Board members,as an Area M



Submitted By  
Timothy Michael Murphy  
Submitted On  
3/1/2021 2:45:06 PM  
Affiliation

To Whom It May Concern;

I have just watched a speech delivered by Kristi Noem, Governor of South Dakota. If you are unaware, South Dakota had zero lockdowns, zero hunker downs, and did not call for closing of any businesses nor declare any businesses "essential" businesses due to the pandemic.

With the availability of the vaccines, social distancing and masking, it is reasonable to keep the meeting schedule for 2022.

There are also some fisheries that legitimately cannot postpone their scheduled meeting in 2022 another year.

The State of Alaska let its Covid Emergency Declaration expire in a move to get the entire State back to normal, if each person takes responsibility for their own health and exercises caution for others health this should never be an issue again.

Sincerely,

Timothy Murphy



Submitted By  
Hannah Heimbuch  
Submitted On  
3/2/2021 3:26:37 PM  
Affiliation  
Under Sixty Cod Harvesters

March 2, 2021

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

**Re: 2020/2021 and 2021/2022 meeting cycle scheduling**

Dear Chairman Carlson-Van Dort and Board of Fisheries members,

The Under Sixty Cod Harvesters is a commercial fishing organization representing vessels less than 60 feet harvesting Pacific cod with pot gear in the Bering Sea, Aleutian Islands and Gulf of Alaska. USCH fishermen operate in many statewater fisheries across Alaska, harvesting Pcod, salmon and herring. We appreciate this opportunity to comment, and your ongoing service to the public process.

**We want to express our serious concern over the decision to double the meeting schedule for the 2021-2022 cycle, and recommend that the schedule be adjusted for a one-year delay, comparable to the Board of Game.**

We believe this is necessary in order to uphold an orderly and robust public process, one that facilitates the meaningful participation of community members, industry and community leaders, Advisory Committees, Board members, and Alaska Department of Fish and Game staff.

While we understand that budget management is not specifically the purview of the Board, combining two years of meeting schedules creates an extraordinary and unmanageable budget scenario, an outcome that can and should be corrected. Considering the existing statewide budget crunch, and an already strained ADF&G budget, it is not pragmatic to assume that the Legislature is willing or able to fund the additional meetings. If they *don't* provide that funding, moving ahead with meetings would require cutting essential management tools and capacity — a grave disservice to Alaska's fishery resources and those who depend upon them. If the Legislature *does* provide that funding, there are still serious issues that would negatively affect fisheries, community members and Department staff statewide.

To list just some of those serious concerns, the doubled schedule does the following:

- Weakens the existing strong BOF public process by over burdening schedules and participation demands for the public, Board members and the staff. This additional stress of facilitation and participation will inevitably affect the quality of that participation;
- Creates a substantial region-to-region inequity by constraining staff and public capacity to respond to and participate in the meetings consolidated into *this* cycle, while others will not be under that same pressure;
- Pushes the public to be able to comprehend and comment on twice the amount of proposals in one cycle, also creating extra cost for private individuals to attend twice the meetings in one cycle;
- Puts an unreasonable burden on the volunteer Advisory Committees (AC's) to work through and comment on twice the meetings;
- Disrupts the balance between the Board of Fisheries and Board of Game; and
- Places an unfunded and — even if funded — distinctly untenable burden on the Alaska Department of Fish and Game's (ADF&G) ability to work through proposals, provide substantive feedback, and attend all of the meetings.

At a time when individuals, families, businesses and Departments across the state have undergone a year of extraordinary and myriad stresses, we find it is in the best interest of our world-class management system, the well being of our communities, and the ongoing stability of our essential resources to proceed with a delayed meeting schedule, rather than a doubled schedule that creates additional and at times insurmountable challenges. We strongly believe that any urgent conservation matters can be appropriately addressed through the existing ACR process, and that meetings should otherwise be delayed.

We appreciate the many precautions the Board and the Department have taken through the course of Covid-19, and we appreciate how challenging these decisions are. **We urge you to reconsider a delayed meeting schedule and thank you sincerely for this opportunity to comment.**

Respectfully,

Hannah Heimbuch, Executive Director



# UNITED FISHERMEN OF ALASKA

**Mailing Address:** P.O. Box 20229, Juneau AK 99802-0229

**Phone:** (907) 586-2820

**E-mail:** [ufa@ufa-fish.org](mailto:ufa@ufa-fish.org) **Website:** [www.ufa-fish.org](http://www.ufa-fish.org)

March 2, 2021

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

**Re: 2020/2021 and 2021/2022 meeting cycle scheduling**

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

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. We have participated in the Board of Fisheries (BOF) process for over four decades and have never seen such a disregard for the public process as created by the January 25<sup>th</sup> decision to double the meeting cycle in 2021/2022. This ill-advised decision creates inequity between regions and disenfranchises the local Advisory Committees and public in general.

UFA held our annual spring meeting this February 17<sup>th</sup>-18<sup>th</sup>. The over-arching theme from our members was deep alarm and shock over the decision to double up the meeting schedule next cycle. While we applaud your decision to postpone the 2020/2021 meeting cycle due to the ongoing COVID-19 pandemic, we cannot fathom why all future meeting cycles were not moved ahead one year as the Board of Game (BOG) chose to do, and as the vast majority of public comments requested.

Our members expressed multiple reasons why they are gravely upset about the BOF decision to double up the 2020/2021 and 2021/2022 meeting cycles. Specifically, this action:

- creates a huge inequity between regions
- weakens the strong public process that the BOF is known for
- places an overly burdensome demand on the public to be able to comprehend and comment on up to twice the amount of proposals in one cycle
- creates an extra cost to private persons to attend twice the meetings in one cycle
- puts an untenable demand on the Advisory Committees (AC's) to work through and comment on double the meetings in one cycle
- makes it impossible for ADF&G staff to meaningfully prepare for, attend and participate
- throws the balance between the BOF and BOG cycles out of sync and
- places an unfunded burden on the Alaska Department of Fish and Game's (ADF&G) ability to assess proposals and attend all of the meetings.



Expanding on these points, doubling up on meeting cycles will place an untenable burden on everyone and calls into question the ability of the BOF to effectively carry out its responsibilities. Doubling the meeting cycles will require review and analysis of twice as many proposals during this period, and attendance at twice as many BOF meetings. This creates inequity between regions whose issues fall within this doubled-up period, and those that will have “normal” workload and meetings in future years. ADF&G made it absolutely clear that it does not have the funding or staff to handle the double workload and will not be able to fully attend all the meetings during this period. For the affected regions, this lack of full participation will weaken the normally strong BOF process. While the board chose (and by doing so, committed to the public) to take on this additional workload, we have significant concerns with the ability of the volunteer members of this public board to effectively manage the substantial additional work this change requires, in addition to maintaining their livelihood. The public process that is expected out of the BOF is harmed if the public does not have faith that the BOF members or ADF&G are giving their full attention to proposals submitted by them.

UFA’s position on the BOF decision is consistent with the overwhelming majority of comments from the AC’s and public for the October 2020 Work Session, November Joint Protocol Meeting, and January Special Meeting that asked for all meeting cycles to be pushed back a year due to the ongoing pandemic. UFA has likewise been made aware of resolutions from multiple AC’s opposing the decision. The AC’s ability to work through BOF and BOG proposals with community members is vital to both processes. The BOF and BOG’s meeting cycles are coordinated so that any one region does not have meetings of both boards in any one cycle. The BOG’s decision to push all meeting cycles ahead one year combined with the BOF’s decision to double up next cycle creates an imbalance between the boards that will exist into perpetuity. By denigrating the AC’s capacity to effectively examine issues before the BOF, the board is self-inflicting serious harm on the public process so important to our fishing communities and sustainable management of our State’s fisheries.

As stated by ADF&G leaders at the January 25<sup>th</sup> Special Meeting, the department does not have the funds in the proposed FY 2022 budget to comment on and attend all the meetings currently scheduled for next cycle. The *Memorandum of ADF&G Boards Support Section*, dated February 24<sup>th</sup>, 2021 states that the department would need an additional \$442.5K to accommodate the schedule. It further states that, “a decision was made to not include this request as part of the Governor’s amended budget proposals for FY22.” That leaves the only option for increased funding to the legislature, which is very aware of the budget cuts that ADF&G has taken in recent years resulting in a direct loss of fishing opportunities for all users. Given Alaska’s fiscal situation we find it both unlikely and unreasonable to expect that the legislature will increase funding to accommodate a BOF decision that creates inequity between the different regions of the state, especially when that decision was in direct opposition to ADF&G comments and the majority of public comments. If the increased funding does not come to fruition and the department is not able to attend all the meetings, we do not see how the BOF can proceed with this schedule.



In closing, we respectfully request reconsideration of the decision to combine the 2020/2021 meeting cycle together with the 2021/2022 cycle and instead move all future cycles ahead one year.

Regards,

Matt Alward  
President

Frances H. Leach  
Executive Director

**UFA MEMBER ORGANIZATIONS**

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association  
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Regional Seafood Development 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 • Fishing Vessel Owners Assn  
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 • Northwest Setnetters 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 Catcher Boats • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association



# UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 \* (253) 279-0707 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)

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

March 1, 2021

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

Dear Chairperson Carlson-Van Dort and Alaska Board of Fisheries members-

United Southeast Alaska Gillnetters would like to offer the following comments for your consideration.

We **support Proposal 276** to address sunset regulations that expired December 31, 2020.

Adoption will allow for reasonable fishing opportunity for fishermen and allow the department the ability to manage in a non-allocative manner. The gear groups that will be affected by these sunset regulations are supportive of this remedy.

We are vehemently **opposed** to the January 25, 2021 decision to have five major meetings during the 2021/2022 meeting cycle, and feel that all meetings should be moved out one year as SE Finfish and Shellfish and Prince William Sound have been. Our reasoning is based on the following facts:

- As noted by the Commissioner of Fish and Game, there is no money available to cover the costs of additional meetings for that time frame. On January 18, 2021, during a United Fisherman of Alaska meeting, the Commissioner stated that the cost would likely



be in the \$500,000-600,000 range, and would have to be approved by the legislature. The Commissioner was informed that a supplemental budget for stacking these meetings would be opposed vigorously by UFA and other gear groups. Moving the meetings out a year will actually save the state money at this point.

- Stacking five meetings into the 2021/2022 cycle will make SE and PWS subject to a four-year cycle followed by a two-year cycle. In an effort to reduce the impact of Covid on some areas, our areas are being subject to take the entire burden of the impact. We view this as discriminatory and rather unfair. Currently, the department is generating Action Plans for stocks of concern for the Stikine and Taku Rivers king salmon. The traditional timeframe for stocks of concern and the Action Plans implementation is three years. Having only a two year cycle, Action Plans will likely end up being five years, which could have unnecessary consequences for all users.
- Stacking the meetings will likely, although no dates have been set, lead to an earlier meeting than we have traditionally seen. In our experience, there will be less data available for the Board and stakeholders to review. For example, in SE, our king salmon data is available the week after Thanksgiving. If our meeting occurred earlier than that, the Board and stakeholders would not have vital information for the discussions regarding Action Plans for king salmon stocks of concern. Data that is used in allocative discussions would also be incomplete for stakeholders and the Board for comments and deliberations.
- Having meetings in their regular calendar time frame allows for better participation. There are few fisheries underway. If the time frame were to be even a month earlier than the traditional time frame, it would lead to less participation, as there are still fisheries being prosecuted. Many in our fleet participate in the Dungeness, shrimp, and troll fisheries, all of which are underway through November, at least.
- Many of our members serve on our local Advisory Committees. Having a date earlier than the traditional time for our meeting will likely compromise having a full committee to comment on proposals, as many are still commercial fishing and guiding. October and November are busy months for subsistence harvest in our region, and we would hate to compromise that important aspect for members of both our fleet, and stakeholders in general.





We feel that moving all meeting cycles out one year will be the least disruptive, clearest, cleanest, and fiscally responsible course of action on this subject. It will also allow for a fair transition for all concerned as an avenue back to the traditional three-year cycle.

Sincerely,

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

Max Worhatch, Executive Director, USAG



Submitted By  
William Lindow  
Submitted On  
3/1/2021 3:13:47 PM  
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I am opposed to adding the 2020/2021 BOF meetings to the 2021/2022 BOF meeting schedule, for all the reasons offered in the comments by United Fishermen of Alaska. Please move the meeting schedule for all areas of the state back one year. This also gives the best chance for the effects of Covid 19 on the meetings to be negligible.

Thank you, Bill Lindow



Submitted By  
Yakov Reutov  
Submitted On  
3/1/2021 10:56:22 AM  
Affiliation

I would like to request that the BOF postpone all meetings in 2021 until 2022 until it is safe and resume the regular cycle, I strongly disagree to lump together different areas into one meeting