



# Southeast Alaska Fishermen's Alliance

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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