

# On-Time Public & Advisory Committee Comments

Alaska Board of Fisheries Special Meeting on 2020/2021 Cycle  
January 25, 2021

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January 16, 2021

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

Dear Chairperson Carlson-Van Dort and Board Members,

The Petersburg Advisory Committee met the evening of January 15, 2021 via Zoom. The purpose of the meeting was to provide comments to the Board of Fisheries regarding the January 25, 2021 Special Meeting. We realize as an AC, our comments would have been better addressed to the Joint Meeting of the Boards of Fisheries and Game, but our ability to meet and submit comments to that meeting was hampered by the necessity of publicly noticing our meeting combined with the deadline for on time comments.

Participation of members was good, with only two members being absent. However, public participation was reduced and AC members noted they would prefer to review proposals for the Southeast Finfish/Shellfish meeting in person as they felt it would increase public participation. We discussed the difficulty we had in noticing a Zoom meeting due to the detailed information needed to call in.

Our committee unanimously supported postponing the regulatory meetings scheduled for this spring and ask they be rescheduled to what would be their normal time frames in 2022. For example, the Southeast regulatory meetings should be held in January. Members feel that next year there will be a much better chance of conducting a meeting with a full public process and without a need to limit the number of participants allowed in a room. No member spoke in favor of web conferencing, and the general consensus was that it would not be possible to fairly conduct regulatory meetings in that manner.

No members offered any proposals that were in urgent need of being addressed before June 30, 2021. Discussion of this letter was that it be addressed to the meetings and when and how they should be held. In the course of the discussion, issues regarding sunset provisions in certain salmon regulations for the Southeast Finfish meeting were offered, but the AC was not comfortable addressing those issues at this time.

The only noted impacts on the public if the meetings were postponed was that the public would be better served by the regular in person board process.

Sincerely,



Max Worhatch, Chairman, Petersburg Advisory Committee



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

A handwritten signature in cursive script that reads "John Dye".

John Dye, Chair



Submitted By  
Benjamin Allen  
Submitted On  
1/20/2021 7:28:52 PM  
Affiliation

Board of Fisheries  
Glenn Haight  
Executive Director

Benjamin Allen  
PO Box 84  
Chignik, AK 99564

January 20, 2021

To Whom it may concern;

Items of consideration have been brought up, as whether or not conducting meetings for the current and future cycles should be postponed. I am in strong opposition of postponing the meetings, because there are extremely pressing agenda items that can adversely affect Alaska State businesses and incomes of many fishermen. As these decisions cannot be made solely by the Alaska department of fish and game because the decisions primarily fall within regulatory and allocative changes. In order to adjust the fisheries in a timely manner, postponing them could be devastating to incomes. I believe that the public process that has been enacted by the state is still extremely valuable and required.

The stakeholders are in need of timely action and Covid 19 has already devastated our industry and continuing in fear of it without appropriate adaptation could be the death sentence of many businesses and job opportunities for the state. I believe it is in the best interest of the deciding body to continue to move forward with regulatory meetings and not to postpone more than absolutely necessary and try and prevent any further and future impacts of the meeting and job opportunities for the state.

Sincerely yours,

Benjamin Allen



# Bristol Bay Economic Development Corporation

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



January 19, 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 Board of Fisheries meeting cycles while facing the health concerns related to COVID19.

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.

First of all, we were all hoping that the spread of COVID19 would subside by the spring. Unfortunately, it does not appear that anyone will be conducting business as usual anytime soon. It is our hope that the virus will settle down by the fall, especially as the vaccines roll out and become readily available. We are very grateful that some of the vaccines made it to Bristol Bay and were given to those with underlying health issues, the elderly, and essential workers. However, the distribution of the vaccines will take some time to reach the majority, and for the people to build immunity after their doses.

Although the Bristol Bay Finfish meeting is not scheduled until November 28<sup>th</sup> – December 2<sup>nd</sup>, we still have concerns of the upcoming meeting. Many of our residents and communities are still very concerned about the virus, as we have numerous multigenerational households with a large population in the high-risk category. It is our understanding that Board of Fisheries is considering postponing meetings due to the ongoing pandemic. Essentially, if the meetings cannot be conducted in-person, then we believe all the meetings should be postponed by one year.

We value the public process that the Board of Fisheries is known for and believe that the level of engagement between the stakeholders, managers, and board members cannot be replicated through a virtual platform. We also acknowledge that there maybe budget constraints by postponing one meeting cycle and overlapping it with another, which will also cause challenges for the local advisory committees and ADF&G staff. Currently, ADF&G has the ability to manage the fisheries if there is a conservation concern, and the public has the ability to submit an ACR out of cycle if deemed necessary. Therefore, we believe that the meetings should be postponed for one year, if they cannot be done in-person safely, to protect the integrity of the Board of Fisheries public process.

Thank you for your time and consideration,

Norman Van Vactor  
Chief Executive Officer



# BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310  
DILLINGHAM, ALASKA 99576  
PHONE (907) 842-5257



- Aleknagik*
- Chignik Bay*
- Chignik Lagoon*
- Chignik Lake*
- Clarks Point*
- Curyung*
- Egegik*
- Ekuk*
- Ekwok*
- Igiugig*
- Iliamna*
- Ivanof Bay*
- Kanatak*
- King Salmon*
- Kokhanok*
- Koliganek*
- Levelock*
- Manokotak*
- Naknek*
- New Stuyahok*
- Newhalen*
- Nondalton*
- Pedro Bay*
- Perryville*
- Pilot Point*
- Port Heiden*
- Portage Creek*
- South Naknek*
- Togiak*
- Twin Hills*
- Ugashik*

January 20, 2021

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

RE: Scheduling of the 2022 Chignik Finfish BOF meeting

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

We understand the Board is considering to delay the Area M/Chignik Finfish meeting for a year. Due to the critical concern over the Chignik Fishery having failed for the past 3 years, we urge that the Board meeting not be delayed, and the concerns be addressed as scheduled, if not sooner.

Our region recognizes the concerns raised by COVID, but the conservation concerns presented by the state of Chignik's sockeye stocks is not an issue that can afford to wait. Chignik's early run has failed to reach minimum escapement goals for each of the last three year; the late run has failed two out of three. The 2021 harvest forecasts show no reprieve from the dismal escapement and harvest patterns the Chignik run has recently suffered. Predicted harvest estimates for Chignik are 165,000 fish – 37,000 sockeye for the early run and 128,000 sockeye for the late run.

Given these obvious conservation issues, Chignik fishermen are concerned that without a Board meeting in 2022, ADFG will not have the management tools necessary in effecting conservation restrictions on intercept fisheries to protect Chignik-bound sockeye.

Although resilient, the hardships our communities have endured the past three years is astounding. Recognizing that the salmon stocks will need time to rebuild, swift action by the Board of Fisheries is critical in re-establishing a sustainably managed fishery.



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Should the board elect to delay the Chignik finfish meeting for a year, BBNA and regional stakeholders will direct the Board in addressing these conservation concerns through Emergency Petition. The rural Advisory Committees have relied on meetings via teleconference for many years. Formation of a formal Chignik fishery BOF working group would greatly benefit the Board. Holding these meetings in a virtual forum would advance the much-needed discourse and solution seeking prior to the 2022 Chignik finfish meeting as regularly scheduled.

The Board process understandably relies on public participation and collaborative problem solving. While recognizing not all stakeholders are able to fully participate in online and telephone forums, we recommend the modern communications now available be fully utilized.

BBNA has always applauded the Boards' efforts of holding in-region meetings. We look forward to again hosting the traditional meetings when the public safety concerns are manageable. Please hold the Chignik meeting at its currently scheduled meeting time and date for 2022.

Sincerely,

Ralph Andersen  
President & CEO

# Chignik Intertribal Coalition

427 Airport Road, Chignik Lagoon, Alaska 99565



PC05  
1 of 1

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

1/20/2021

RE: **2021-2022** Tentative Meeting schedule changes

Dear Members of the Alaska Board of Fisheries,

Thank you for this opportunity to acknowledge your consideration for the safety and health of all our communities. We are all looking to that day when we can return to normal schedules.

Unfortunately, Chignik stakeholders including commercial and subsistence fishermen and Chignik's five villages are greatly concerned over the prospect that the Area M/Chignik Board of Fisheries meeting could be postponed by a year due to the pandemic. 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 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 escapements shortages. This is alarming. Per the Department's WASSIP study, Chignik-bound sockeye salmon range from the second to foremost leading stock in the June and Post-June interception fisheries in Area M's eastern reach of on the South Peninsula. Chignik's two 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 entreat the Board to maintain the Area M/Chignik Board of Fisheries meeting of 2022.

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

George Anderson

Chignik Intertribal Coalition, President



Submitted By  
Martin J Fabry  
Submitted On  
12/17/2020 8:28:59 AM  
Affiliation  
Old People

Phone  
19077552205

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Address  
6655 Big Salt Lake Rd,  
Fisherman Alley  
Prince of Wales Is. ALASKA, Alaska 99925

I would like to propose that the board of fish have this idea passed into law to support senior residents of the state. The proposal is;

Any resident holding a permanent fishing/hunting/trapping license may use two poles (year round) when fishing alone from a boat. This means no other person in the boat. It would be very easy to regulate and check for F & G Officers and it surely would help us seniors.

Please & thank you,

Martin J. Fabry

Klawock, Alaska



Submitted By  
Matthew Alward  
Submitted On  
1/20/2021 12:51:00 PM  
Affiliation  
self

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

I am a commercial fisherman from Homer and have been involved in the Board of Fisheries process for years. I appreciate this opportunity to comment on the January 25th special meeting and the current meeting cycle schedule.

I am a strong believer in the robust public process that exemplifies our Board of Fisheries. The in-person engagement between the public and board members and between stakeholders ourselves is critical to give the board the information that you need to make the resource management decisions that you are appointed to make consistent with the public interest as laid out in Article 8 of our State Constitution. I feel that trying to hold virtual meetings would be a huge disservice to the state resources and all the users of our resources.

Given the pervasive communal transmission of COVID-19 in the state and the slow rollout of vaccinations I do not believe it is responsible to hold in-person meetings in the communities that are scheduled to hold them this cycle.

I support postponing the 2020/2021 meeting cycle for a year except for proposals with imminent time sensitive conservation needs. Thank you for your consideration of my comments.

Respectfully,

Matthew Alward



Submitted By  
Michael Adams  
Submitted On  
1/16/2021 4:06:22 PM  
Affiliation  
Cooper Landing AC

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I believe in person meeting are essential to the board process. In person meetings facilitate community engagement and encourage a free exchange of ideas where all community members can have their voices heard.

Involving community members in the process is essential to good AC recommendations and to good overall management.

Many people do not have or are not comfortable using electronic formats such as zoom. As a result many people are left out of the process. These people and their concerns are important to the discussion and ultimately the decisions that govern our fish and game regulations.

Of especially important note are rural and subsistence users who will disproportionately suffer when meetings are held online. It is also important to note that AC members and board members are held more accountable for their decisions when they are face to face with the users who will be affected by them.

I encourage a return to in person meetings as soon as possible. I do not believe that decisions reached via remote meetings will fairly represent all users therefore I think only essential items such as reauthorizations or agenda items that are especially urgent (for example items aimed at addressing population concerns) should be conducted via web conferencing.



Submitted By  
John C. Whissel  
Submitted On  
1/20/2021 5:16:25 PM  
Affiliation  
Native Village of Eyak

Phone  
907-424-7738

Email  
[john.whissel@eyak-nsn.gov](mailto:john.whissel@eyak-nsn.gov)

Address  
PO Box 1388  
Cordova, Alaska 99574

The Native Village of Eyak supports the Board of Fish maintaining in-person meetings, and holding it's Prince William Sound finfish meeting in-person, in Cordova, AK, as planned once it is safe to do so.



Est. 1955

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

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PC10  
1 of 1

1/20/21

RE: Alaska Board of Fisheries Special Meeting, January 25, 2021

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 supports postponing the 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. We feel that the face to face exchange of information and ideas is crucial in allowing Board of Fisheries members to make the best decisions for the resources of the State of Alaska. "Web conferencing" is limited in many ways and leaves a large segment of the public without a means to meaningfully participate. NPFA only supports hearing proposals with imminent time sensitive conservation needs. We suggest postponing the board cycle one year.

Respectfully,

G Malcolm Milne  
President, North Pacific Fisheries Association



Submitted By  
Raechel Allen  
Submitted On  
1/20/2021 6:45:26 PM  
Affiliation

To Whom It May Concern:

Please keep the 2022 Board of Fish Cycle as scheduled. Chignik has had three years of sockeye runs fall short of minimum escapement. We in Chignik have been assured by various members of ADF&G that the Board process is the best place to address our concerns. We are in a state of emergency in Chignik. It was announced just the other day by the LPSD that the school would close for 21-22 as families leave the area and businesses collapse. Many people in the S0IL fishery have relied on it being a sustainable fishery. As it stands, next year is forecasted at a dismal 165,000 sockeye harvest. We must be able to have due process to bring our concerns and requests to the people who have authority to make adjustments to fisheries as the need arises. That need has never been more pressing for Chignik as now. Please don't postpone this opportunity. The vaccine program for COVID-19 is being implemented successfully and will bring us nearer to herd immunity a year from now. At least keep the schedule for Area M/Chignik as it stands and look at postponing only if the pandemic hasn't been turned around as the dates draw nearer. Thank you for your consideration.

Sincerely,

Raechel Allen



**From:** [Dallasak789](#)  
**To:** [Rintala, Jessalynn F \(DFG\)](#)  
**Subject:** Fwd: 4 alternative solutions  
**Date:** Tuesday, November 17, 2020 3:48:09 PM  
**Attachments:** [Letter to State of Alaska Department of Fish and Game.docx](#)

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I was told to send this letter Thur you.  
Tap the blue to read

To the npfmc.org

Look ,how come we have to,as Commerical fisherman play defense?  
We paid to Commerical fish., something you don't see guides doing.

The president of America said resolve. To you folks resolve this issue. I believe he said you have a 180 days.

This letter might not be perfect.

But the Magnuson Stevens act says

To manage the spawning grounds.

Not the ezz area. The spawning grounds is a free for all ,to to many users. Over abuse of the resource, playing politic with god creation. Mother Nature will fix if you folks don't.

This letter says the dipnet fishery,and the guides are taking fish, to many fish! On the spawning grounds.

The president aware of what going on here.

He said fix it.

Alternative solution number five

Stop the dipnet fishery ,started by adfg.

Stop the act of catch and release.

Limit the guides to fishing the ocean only.

Let the river heal it self.

This is what president trump watching.

He know the drill, and best You guys comply.

Everything said here is going to President trump.

From me.

He paying attention ,he said fix It.



Ron Carmon  
51995 Arness Rd.  
Kenai, AK 99611  
(907)953-0238  
[Dallasak789@hotmail.com](mailto:Dallasak789@hotmail.com)

Attn: State of Alaska Department of Fish and Game Ombudsman

It is time to look at the impact of personal use fisheries and the impact it has on our local waters, state economy, and the worlds waters.

First, I'd like to discuss the environment of the ocean in relationship to acidity and the importance of plankton eaters, such as sockeye salmon, to the spawning grounds in the rivers and the impact of the ecosystem in the ocean. Secondly, I'd like to discuss is the economic impact of the fishing regulations on the Kenai Peninsula borough. Over the last 30 years, the dipnet fishery on the peninsula has taken \$542 million each year in fish from just the two rivers, Kenai and Kasilof. They also fish other rivers on the peninsula. Thirdly, I would like to explore the moral responsibility of the State of Alaska to manage our fishery. Finally, I would like to present a solution that would ensure the viability of all parties in the industry and a sustained fishery.

The Sport Fishing Association and Coastal Conservation take \$300 million retail value off these two rivers. Almost zero dollars of income goes to the Kenai Borough, the State of Alaska, or its citizens. The amount of the Alaska general fund in the last 30 years has been down by \$70 million each year. This is a result of the fish going to the dip net fishery and sport guide fishery and not the commercial fishery- who pays into the general fund.

This has been done now for 30 years. Kenai Borough's revenue could be drastically improved. I believe the Sport Fishing Association has removed a total of \$44 billion of fish off the Kenai Peninsula alone over the past 30 years. We can do better than that. Selling the fish saves the Kenai Peninsula and the State of Alaska thus providing an improved income source.

For a long time, ADF&G has managed our fishery- our commercial fishery, our sport fishery, subsistence fishery, and personal use fishery. In 1984, Tony Knowles came up with the idea to start the Board of Fisheries to efficiently manage the types of fishing statewide.

The people who live on the Kenai Peninsula want the practice of catch and release stopped. It's killing the prime targeted fish. The people on the Kenai Peninsula want the dipnet fishery discontinued. If the practice of dip netting fish cannot be ceased, the people of the Kenai Peninsula would like the number of allowed fish to be decreased.

The Sports Fishermen Guide Association is allowed over 300 days of sport fishing on the ocean around the Kenai Peninsula. They are allowed 150-170 days on the Kenai and Kasilof rivers alone. The Sport Fishing Guide Association can have 6.4 million guides in the United States, and they frequent the Kenai Peninsula. They fish all species of fish on the peninsula. In 2018, sports fishermen took 179,000 halibut, 229,000 sockeye salmon, 31,400 king salmon, 60,000 silver, 40,000 non-pelagic cod, and 40,000 pelagic cod. According to the logs noted from the Department of Fish and Game, in 1984, 85 and 86, the guides took 3 to 4 million sockeye salmon, plankton eaters, just off the Kenai River alone. In 1984, they took



110,000 king salmon. There is a moral obligation that the state must take to save our fishery and they are not doing it.

There's a legal obligation to the other fisheries also. The Sport Fishing Guide Association is fighting for the personal use fishery. Why would the Sport Fishing Guide Association want personal use? I believe that's a personal attack against the commercial fishery. The more fish they get up the river the better for the sports fishermen. Over the years 110,000 people come down from Anchorage and other parts of Alaska to harvest 7 million fish a year by dip netting on the Kasilof and Kenai Rivers. There is also a legal battle that has been won by the commercial fishermen. Federal laws state you cannot ruin a fishery to support another fishery. This has been going on for 30 years now. There are many reasons change these practices from the last 30 years.

The ocean's acidity level is up. The taking of sockeye salmon, crab, and pollock has taken a toll. These fish and crab are critical in balancing the acidity level in the ocean. Killing sockeye salmon in the river has a criminal effect on the ecosystem. Overpopulation of the river with too many sockeye salmon will also kill the river salmon run. It's important to ensure the ecosystem of the rivers is maintained for the salmon fry to leave the river. The Kenai River sonar is the only sonar system that's proven not to work. Sonar systems worldwide have been proven better than the sonar system used in the Kenai River. There are better ways to count fish and monitor what's going up and down the river. But most importantly, we need sockeye salmon to have a safe space safe place to stay- not a playground for the practice of the blood sport of catch and release.

The practice of catch and release was put in so the guides could work their boats 18 hours each day, every day of the week. This must stop. The commercial fisherman fishery in Cook Inlet is allowed anywhere from one to 15 days to fish. Our canneries and processing plants can't get enough fish to economically stay running. The costs to clean up these sites, after the canneries are no longer viable, will be in the billions of dollars due to environmental clean-up. They are falling apart every day. The canneries are right on the edge of the water and they are a mess- an ecological nightmare waiting to happen. ADF&G and the Board of Fisheries will be to blame.

This was a vibrant fishery. In fact, it was the second biggest fishery in the world. It generated over 100 million dollars of income in the 1980s and it will all be wiped out. The \$68 billion that the state has in its Permanent Fund account will go to clean up these dilapidated canneries on the river.

Remember, a lawsuit has already been won and the people of the Kenai Peninsula are asking the Board of Fisheries to step up and stop this practice. There are better ways to run this fishery. It's not about who gets the fish, or who the fish belong to, but who has killed the Alaskan salmon industry. Over the last 30 years, we had the freshest market salmon sold in the United States. It was proudly on display and sold daily. We've lost that part of the market because the politicians and the State of Alaska have taken our marketing away along with the industry. Again, I say there's a better way to manage our fishing industry

My solution is to ask the Coastal Conservation Association, Bass Pro Shop and the 20,000 other box store vendors who supply the commercial guide-sport industry to pay back the money owed to the other fishermen in the Cook Inlet fishery. The price would be \$44 billion.

I believe each fisherman, set netter, and drift fisherman needs 3 million dollars tax-free money (permits will go away) just to catch up what has been lost over the last 30 years for these approx. 2000 fishermen.



By doing this, the state of Alaska could take away commercial fishing permits. Some people paid up to \$260,000 for these permits years ago. I personally paid \$83,120 in permits and licenses in the past 6 years. The practice of purchasing permits would no longer be necessary. Commercial fishermen could fish without purchasing a costly permit. I think the retailers would be willing to pay the \$44 billion because they need to sell their fishing supplies, boats, and equipment to the local sport commercial fishermen who would now have more liquid funds.

The annual income collected from permits whose funds go toward Coastal Conservation can be passed onto Bass Pro Shops and the local vendors. These vendors have already collected 30 years of income from expert guides who have not paid any funds for the Alaskan fish. They fish for free, reap the bounty of the Alaskan waters. They have not been required to obtain a license for the last 30 years. With my plan, the Sports Guide Association must purchase a license. Not one single user group would be impacted as the cost would be spread throughout the industry. The only significant impact would be if the fishery dies off completely due to poor management.

I believe it will get better, though. The Sport Guide Association will have to buy a license and sport guides will have to catch their fish in oceans rather than the river, just like commercial fishermen do. But as the river becomes healthy, so will the fishery. The environmental damage from the canneries will be fixed by their own dollars. Commercial fishing will improve, and the cannery industry will survive. Using personal fishing as a way of subsistence is a lie. This must stop. Subsistence fishing can be regulated. Only set-net and drift-net fishermen who want to fish can fish, but I believe most of them will quit. The market will determine this outcome.

The sockeye salmon, plankton eaters, must have a safe place in the river to spawn. It must be protected like a sanctuary. I believe you can sport fish the river, but I don't believe it should be open for commercial fishing. The industry of commercial sport guides is a commercial business. They take a lot of our fish. The rest of the money, the \$40 billion the state gets from Bass Pro Shops, the box stores, and Coastal Conservation, which was taken off of the ocean floor, belongs to the state of Alaska.

When considering how to manage these fish, who are a lifeline in our oceans, we must ask ourselves these questions:

Is personal use fishing,

A threat to our immediate environment and our planet? Yes.

A threat to our economy? Yes.

Unregulated? Yes.

Unenforced? Yes.

Overall, detrimental not to have? No.

Commercial fishing for sockeye salmon has been the primary source of income for much of the Kenai Peninsula and other areas in Alaska. Politicians are raiding the Permanent Fund because our state is in an economic crisis. Changing policies towards protecting these sanctuaries and regulating the harvesting of the fish will certainly create a revenue source that is untapped at this time.



I urge you to let these fish come back to the rivers, spawn, and grow the population allowing for an improved balance in the oceans. Allow fishing to only be in the oceans, prevent the blood sport of catch and release to occur. There is a grander picture and the opportunity is now to change the world's waters for the better.

Ombudsman, I would like you to rule this personal use fishery as illegal. The federal courts have already ruled that guide fishing is illegal and took away profits from the commercial fishery. A striving, premiere commercial fishery has now been degraded into common use and guide industry.

Sincerely,

Ron Carmon

Kenai, Alaska



**From:** [Dallasak789](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Nmprmcouncil  
**Date:** Monday, November 16, 2020 9:48:27 PM  
**Attachments:** [Letter to State of Alaska Department of Fish and Game.docx](#)

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Tried to comment ,on up coming decision.  
Remember [REDACTED]  
Came from the coastal conservation association.  
20 years ago.

Like having a fox in the hen house.  
Tap the blue square to read



January 20, 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

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

Silver Bay Seafoods is a vertically integrated, primarily fishermen-owned processor of frozen 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 and freezing 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.

After hearing the reports on the status of COVID-19 in Alaska and the discussion amongst the joint board members this week, we were very encouraged to hear that representatives from both boards recognize the significant risk of hosting in-person meetings. Without in-person meetings, we ask that you consider fully postponing this year's regulatory cycle and pushing out future meeting cycles by one year. We do not support moving to a virtual platform as it would exclude or significantly limit Alaskans' access to the regulatory process (both BOF and AC) and ultimately the resource. The Joint Boards recently received and recognized extensive public comments about these concerns.

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 existing regulations currently in place for the 2020 season be extended through the 2021 season, and until we can convene in-person meetings. This includes regulations that have sunset dates.

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 scheduled 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



January 18, 2021

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

**Re: January 25, 2021 Special Meeting of the Alaska Board of Fisheries**

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

Thank you for taking comments concerning the 2020/2021 scheduled Board of Fish meetings. We would like to offer the following comments regarding upcoming regulatory meetings.

- We are of the position that special meetings, work sessions, and committee meetings can be effectively conducted through web conferencing. We do NOT think that regional 3-year cycled meetings with large amounts of proposals would be conducive to public participation through web conferencing.
- We do not have any proposals in particular that are urgent prior to June 30, 2021. However, there are regulations that changed with the calendar year that we would like addressed.

**5AAC 33.366. Northern Southeast seine salmon fishery management plans**  
**5AAC 33.376. Deep Inlet Terminal Harvest Area Salmon Management Plan**  
**5AAC 33.383. District 7: Anita Bay Terminal Harvest Area Salmon Management Plan**

These regulations all have sunset provisions. Our ask is that the board extend the language present for the 2020 calendar year through 2021. These regulations are part of an agreement between SEAS and USAG in January 2018. While there are proposals surrounding these regulations, we feel they will best be addressed in a full in-person meeting. Current Action Plans for stocks of concern can be left in place for another year in our opinion. New Action Plans, which the public has not seen, can be addressed with conservative management and EO authority.

- We do not feel that any specific proposals should be considered through a web conference. It is our opinion that taking up any proposal outside of a typical public in person meeting will be deleterious to the public process we hold in such high esteem.
- We are of the opinion that the regional 3-year cycled meetings postponed to the spring of 2021 be rescheduled to the usual time frame associated with those meetings, i.e., be postponed one year later than what was originally scheduled. This would allow for a much higher proportion of vaccination for COVID-19, and in all likelihood, allow for a full public meeting.



- Most participants would prefer a fully public meeting. The impacts of postponing the meetings are far less than either of the impacts that may be incurred by having a fully public meeting in the current time frame with regard to the public's health, or a web conference that could compromise participation by the public in general. While postponing this cycle may cause postponing other cycles out another year, critical proposals to those regions can be selectively proposed through the Agenda Change Request process.

Respectfully,

United Southeast Gillnet Association (USAG), Max Worhatch

Southeast Alaska Seiners Association (SEAS), Susan Doherty

Southeast Alaska Fishermen's Alliance (SEAFSA), Kathy Hansen

Alaska Native Inter-Tribal Association of Seiners (Anita), President Delbert Kadake

Petersburg Vessel Owner's Association (PVOA), Megan O'Neil

Alaska Longline Fishermen's Association (ALFA), Linda Behnken

Alaska Trollers Association (ATA), Amy Daugherty

Southeast Alaska Guides Organization (SEAGO), Forrest Braden



January 19, 2021

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

**Re: January 25, 2021 Special Meeting of the Alaska Board of Fisheries**

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

Thank you for taking comments concerning the 2020/2021 scheduled Board of Fish meetings. I am the Vice -Chair of the Ketchikan Fish and Game Advisory Committee and have some concerns and comments in regard to the scheduling of future in-person or telephonic BOF meetings.

We have not been able to meet, so have been unable to review as a body, the proposals and make recommendations should there be a telephonic meeting. SE has 154 proposals and I believe the community input, through the AC process, will be seriously compromised should the meeting occur telephonically. If in-person meetings occur in April under current COVID-19 distancing requirements, how would you choose "who" gets to be present at said meetings? The allowable number of 64 participants at the Ted Ferry Center, under the best of conditions, is not enough participation to make this an open public forum. For the Ketchikan AC to fully carry out its public obligations, I believe the SE meeting should be postponed one full year and take place at the traditional time frame.

Thank you,

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

Susan Doherty  
Vice-Chair Ketchikan AC