

On-Time Public Comment List

Alaska Board of Fisheries Special Meeting on 2020/2021 Cycle
September 16, 2020

Alfredo Abou Eid	PC01
Ann-Marie Parker	PC02
Brooke Wright.....	PC03
Chugach Regional Resources Commission	PC04
Dave Egelston	PC05
DIPAC	PC06
Donald Fox	PC07
Frank Danford	PC08
Kenneth Jones.....	PC09
Kodiak Regional Aquaculture Association	PC10
Kurt & Trina Whitehead	PC11
Matt Lawrie.....	PC12
Nancy Mendenhall	PC13
Randy Zarnke	PC14
Rep. Louise Stutes	PC15
Resident Hunters of Alaska	PC16
Ron Opheim	PC17
Ryan Neneber	PC18
Sitka Tribe of Alaska	PC19
Southeast Alaska Fishermen's Alliance	PC20
Southeast Alaska Seiners	PC21
Steve Merritt.....	PC22
Tad Fujioka.....	PC23
Territorial Sportsmen, Inc.	PC24
United Southeast Alaska Gillnetters.....	PC25
Valdez Fisheries Development Association	PC26
Will Samuel	PC27
Aleutians East Borough	PC28

On-Time Public Comment List

Alaska Board of Fisheries Special Meeting on 2020/2021 Cycle
September 16, 2020

Cordova District Fishermen United	PC29
Southern Southeast Regional Aquaculture Association	PC30



From: alaskanfrontier1947@yahoo.com
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Date: Friday, July 24, 2020 12:47:41 PM

It should be postponed until we get to a better situation thank you ac member from chignik alfredo abou eid



From: [Parker Guide Service](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comments about Travel Requirement
Date: Monday, August 24, 2020 12:31:17 PM
Attachments: [scan0035.pdf](#)

We are not opposed to being required to participate in meetings online or through zoom. However to expect people to physically show up from all over, pay the expense of getting there, traveling in the winter months with Alaska Airlines cutting back flights to all of Alaska (for instance it takes almost two days to get from Sitka to Petersburg) and we are not even mentioning COVID travel restrictions and all that entails is unreasonable. I don't think people in the Anchorage or road system areas understand the logistics and expense involved in what you are proposing. There are several days where there are no evening flights back to certain towns, which can be an additional day of overnighing until the next day to fly home. For example, I am looking at next year's BOG meeting March 12-19 in Fairbanks. If coming from Sitka, one would have to overnight Thursday the 11th and Friday night the 19th to be able to attend the full meeting. This is 9 days in a hotel room with those expenses as well. Sitka is usually better on flights in the winter than most fly in only communities in Alaska. Please see attached below an example of just the flight times and hotel costs would be around 1000. for 9 nights for one room. I went to one BOG meeting once when I had young children when it was held in Ketchikan. I had to pay for overnight child care, flights from Sitka, two nights hotels, meals, and cabs. By the time all was said and done I spent over 2,000 to attend a meeting for a day and a half.

All of the SE guides have productive and well attended meetings with the USFS every year with the availability of being online or in person attendance.. I am not sure why we could not implement the same.

Federal and state entities pay for their employees to attend these meetings and the travel expenses that are incurred.

Guides are having to absorb these expenses of extra days of time and money on their own. After this year, several just cannot afford it.

Please reconsider getting on board with today's new technology by offering and online options to people so that they will be able to be a presence in your mandatory meeting platform.

Thank you,

Ann-Marie Parker
Parker Guide Service

--

Parker Guide Service
Bruce & Ann-Marie Parker
P.O. Box 6290
Sitka, AK. 99835
Cell: Bruce (907) 738-6760 or Ann-Marie (907) 747-6026
parkerguideservice@gmail.com
www.alaskaboathunts.com
www.alaskaboatcruises.com



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Flight summary [Change](#) | [Remove](#)

Flight	Departs	Arrives	
Alaska Alaska 67 Main (V) 1 stop Details Distance: 662 mi Duration: 3h 9m	Sitka (SIT) Thu, Mar 11 7:25 pm	Anchorage (ANC) Thu, Mar 11 10:34 pm	Price for 2 passengers \$1,104.40 Taxes, fees and charges Price guarantee Shop again using a discount or companion fare code .
Alaska Alaska 167 Main (V) Nonstop Details Distance: 260 mi Duration: 0h 56m	Anchorage (ANC) Thu, Mar 11 11:15 pm	Fairbanks (FAI) + Fri, Mar 12 12:11 am	
Alaska Alaska 192 Main (V) Nonstop Details Distance: 260 mi Duration: 0h 57m	Fairbanks (FAI) Fri, Mar 19 5:50 pm	Anchorage (ANC) Fri, Mar 19 6:47 pm	
Alaska Alaska 62 Main (V) 1 stop Details Distance: 662 mi Duration: 3h 15m	Anchorage (ANC) Sat, Mar 20 7:50 am	Sitka (SIT) Sat, Mar 20 11:05 am	

+ Indicates the arrival date is different than the departure date.

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From: [Brooke Wright](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Date: Monday, August 31, 2020 4:57:37 PM

Alaska's fish and game regulatory process is among the most public in the nation and to safely increase participation throughout Alaska during the global pandemic it is in the best interest to serve Alaskan hunters & fishers through a virtual meeting with the option of telephonic participation. An online virtual meeting will increase participation, Alaskan landbase divides access to urban meeting settings and many important public meetings have been using the virtual meeting option with great success. This also eliminates the barrier to weather disruptions to the members and public participants, affordability to the state compared to an in-person meeting, and testimony on key issues is more equitable through equal access that a virtual meeting can provide.



Chugach Regional Resources Commission

Chenega
Eyak
Nanwalek
Port Graham
Qutekcak
Native Tribe
Tatitlek
Valdez Native
Tribe

May it please the Board,

Upon request for public comment by the Board of Game and Board of Fish, Chugach Regional Resources Commission would like to advocate for the following positions.

1. Should the boards postpone the 2020/2021 meeting schedule until conditions improve? What factors should be considered before in-person meetings are held?
 - a. CRRC believes that the regularly scheduled meeting **should not be postponed** until conditions improve. Instead of postponement, other measures should be considered such as requiring social distancing and mask-wearing. We suggest limiting in-person engagement such as only inviting those who will be testifying and employing a teleconference system for those who wish to only listen. The impacts of the coronavirus have serious health implications and measures must be taken to ensure the safety of the Alaskan community. However, with this in mind, it is CRRC's position that the wildlife that your boards govern are crucial food sources and ways of life for individuals across the state and thus holding the regularly scheduled meetings, and doing so in a manner that continues to facilitate testimony and consider proposals is necessary.
2. Would an on-line virtual board meeting with an option for taking testimony telephonically be adequate for conducting board meetings?
 - a. Yes, a teleconference system that allows for testimony to be given would be an effective substitution in lieu on meeting in-person. Other agencies like the Federal Subsistence Board have recently demonstrated the adequacy of this system.
3. The Board of Fisheries conducts its committee of the whole process and engages in a significant level of public-led substitute language. Comments on how these two functions might be carried out in an on-line virtual meeting are encouraged.
 - a. No comment.

Best Regards,

Willow Hetrick, Executive Director
Chugach Regional Resources Commission
willow@crrcalaska.org
(907) 330-9085



From: [David Egelston](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#); [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Board meeting comments
Date: Thursday, July 23, 2020 10:59:34 AM

Please note my comments in bold below.

1. Should the boards postpone the 2020/2021 meeting schedule until conditions improve? What factors should be considered before in-person meetings are held?

No, given the uncertainty of the response to the virus I think it is important for the various processes to continue on. Given that many of the decisions made by the boards directly affect fish and wildlife populations and management, and directly affect subsistence users, I believe that the meeting should continue.

2. Would an on-line virtual board meeting with an option for taking testimony telephonically be adequate for conducting board meetings?

Yes, I believe so. It is not as easy as face to face meetings, but these types of meetings are becoming more frequent and the public is more accepting. Further, it would save the state significant money by reducing/eliminating travel and per diem expenses for the meetings.

3. The Board of Fisheries conducts its committee of the whole process and engages in a significant level of public-led substitute language. Comments on how these two functions might be carried out in an on-line virtual meeting are encouraged.

Again, it may be more difficult, but I believe that it is possible to accomplish. Everyone needs to be patient as it might take more time, but given that people will not be traveling, sometimes for days, total time expended would be equal or less than normal.

Thank you for the opportunity to coment.

**David Egelston
Thorne Bay**



Douglas Island Pink and Chum, Inc.

2697 Channel Drive ◦ Juneau, Alaska 99801

(907) 463-5114 ◦ www.dipac.net

Alaska Dept. of Fish and Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
Via Email: dfg.bof.comments@alaska.gov

August 17, 2020

RE: Board of Fish Meeting Cycle

Members of the Alaska Board of Fisheries,

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit hatchery corporation based out of Juneau, Alaska. The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.

DIPAC supports the proposition to delay all Board of Fisheries meetings by one full year.

Due to the health risks associated with the COVID-19 pandemic, the importance of in-person discussion at the Board of Fisheries meetings during breaks and through public testimony, and the difficulties associated with hosting large group virtual meetings, DIPAC supports the idea to delay the 2020/2021 meeting cycle by one full year. With human lives at risk if meetings were hosted in person, and with the likelihood of unequal representation of the voice of the public due to varying abilities in use of technology if hosted virtually, one year without changes to regulations appears to be the best option to maintain the integrity of the board process and to ensure the health and safety of all Alaskans.

Respectfully,

Katie Harms
Executive Director - DIPAC



From: [Donald Fox](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: BOF MEETINGS
Date: Wednesday, July 22, 2020 3:41:54 PM

As a former 25 year member of the Kodiak Advisory Committee and participant at many BOF and BOG meetings I would postpone the next meetings or go to virtual and telephonic participation until we see where this pandemic is heading. Donald Fox Kodiak Alaska

Sent from my iPhone



Submitted By
Frank
Submitted On
7/22/2020 2:24:48 PM
Affiliation

Phone
907-230-0176
Email
frankdanford@gci.net
Address
PO Box 241183
Anchorage, Alaska 99524

i have been talking to some of the out of state hunters that got the tage for Caribou in 13-A and there not coming , it will cost to much

They were put in on the drawing with a booking agent that they pay each year for tags that are out there to go hunting

Some of the other people i talk to said they were not coming and they wood like to know if the tag was transferable to and other hunter , there son lived uo here and he put him in so they wood beale to tie up the tag so some one els wood not get it

i think this tags shoud go to Guides that can sell the hunts and the state will make more money that way

i think that the meeting shoud go on



From: [Kenneth Jones](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Board of fish
Date: Friday, August 21, 2020 4:15:14 PM

Please postpone all 2020 board of fish meetings until they can be met in person. I have grave concerns with conducting these proceedings electronically. Mainly People can communicate with board members during deliberations on other devices that cannot be seen via webcam.

I would suggest that you postpone for at least one full year, and re-open the proposal acceptance period.

Thank you.

Kenneth B Jones
Samani Fisheries LLC
Cell : 9073603456
FV Serenity
FV Second Wind

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Phone: 907-486-6555

Fax: 907-486-4105

www.kraa.org

Glen Haight, Executive Director
Alaska Board of Fisheries
ADF&G Support Section
P.O. Box 115526
Juneau, AK 99811

August 30, 2020

Re: Request for Comment Regarding Board's 2020-21 Board Cycle

Dear Glen and Board Members,

Kodiak Regional Aquaculture Association (KRAA) supports the Board's reassessment of the 2020-21 Board cycle. Through this process, the Board is acknowledging the challenges of the current pandemic and how that may impact the public process for the upcoming Board of Fisheries cycle. In response, KRAA strongly encourages substantial changes for the 2020-21 cycle. The call for comment indicates, "Alaska's fish and game regulatory process is among the most public in the nation". Consequently, Covid-19 related travel, gathering and distance restrictions will significantly impact what we have come to know as "the Board Process" and is likely to diminish equal participation opportunities as well as informal information exchanges that are an important part of Board meetings.

It should be clear to every Alaskan that it was the intention of the framers of Alaska's constitution that the public have the ability to provide direct input into the regulatory and allocative decisions regarding our natural resources. A key element to this public process is the opportunity to meet with Board members face-to-face and to be able to discuss various proposals and how they will affect users of the resource. In this day and age of social media, trolling, and what amounts to online character assassination, this level of personal interaction and accountability remains vital to the successful and established public process of the Alaska's Board of Fisheries.

Additionally, the ability to "pass the mic" during the Committee of the Whole process, to have real, in-time discussion and information exchange, and to seek out solutions through a larger group process is something that will just not happen through an online or virtual format. Under the current BOF process, pandemic notwithstanding, there are often physical, financial, and, even, technological barriers to the participation of some Alaskans in the Board of Fisheries process. Taking the process to an online format is likely to create even greater barriers to participation. The individuals and communities likely to already be affected by barriers to participation are also likely to be disproportionately disadvantaged compared to more centrally-located, technologically advanced groups and individuals. Those that are most well versed in the Board process and/or more well-connected to decision-makers will have even greater access, likely greater time, and thus greater influence on the process by the simple fact that so many others will be unable to participate in the process.

In the name of public safety and in acknowledgement of the challenges an online or virtual format may present to creation of an accessible and transparent process, KRAA believes the Board should minimize regulatory decision-making until stakeholders can meet, in person, with the Board. Personal interface



between members of the Board and members of the public is critical to assuring that the public's input and participation is taken into account in the resource decisions that affect them. On the other hand, we also should acknowledge that each of the areas/gear types currently listed for the 2020 cycle may have issues that are time-sensitive and should be addressed during the 2020-21 cycle. To balance these two competing values, KRAA would recommend that the Board minimize 2020-21 decision-making but allow a process for time-sensitive issues which could be similar to the "agenda change request" and "emergency petition" process.

KRAA offers these suggestions as a starting point for the 2020-21 Board of Fisheries cycle:

- a. First, though our suggestion is to forgo online-only or telephonic meetings where possible, the October work session should be held via Zoom or other video conferencing program that allows both audio and visual interface with the Board.

At this meeting the Board could make decisions related to ACR's, cycle organization, and Stocks of Concern. In addition, the Board could focus on developing criteria for assessing which of the proposals submitted to the Board for the 2020-21 cycle may be time-sensitive. It would be important the Board give notice NOW that it will take on this task during the October work session. The criteria should assess whether or not failure to address a proposal during the 2020-21 Board cycle would cause harm to the resource, continued inequity, undue hardship, etc. (Similar to the criteria developed for an agenda change request but, perhaps, will a different emphasis.)

In other words, during a pandemic the Board need not take up every proposal. Instead, the Board should determine those proposals that require immediate attention and form a plan to address only those proposals in a single 2021 meeting.

- b. After the October work session, Notice of the criteria adopted by the Board for "time sensitive consideration during the 2020-21 Board cycle" would be forwarded to the Department as well as each individual or entity that sent in a 2020-21 proposal. The proposer could then have an opportunity to provide the Board with comment regarding why a particular proposal is time sensitive (Again, similar to the documentation a proposer provides for an Agenda Change Request). Deadline for response should be December 1, 2020.
- c. A December meeting should then be limited to review of the Department and public's comments regarding whether proposals are "time sensitive" for the Board during the 2020-21 cycle. The Board would then make a final determination of which proposals will be taken up during the single, March 2020-21 meeting to address time sensitive proposals. This December meeting should be a one-day meeting via Zoom or other audio/visual conferencing program. KRAA's predicts there will be just a few proposals in each area/gear type that the Board may deem time-sensitive.
- d. The Hatchery Committee meeting on the agenda should be rescheduled for the 2021-22 Board cycle. The Board spent considerable time addressing Hatchery issues during the 2019-20 Board Cycle and, though valuable for the purposes of education and understanding, the committee meeting can be reinstated in 2022.
- e. **A single March Alaska Board of Fisheries meeting should be scheduled for those proposals designated as time-sensitive.** KRAA suggests that the Board plan to have this meeting "in person" in Anchorage, if possible, with the precautions and protocols appropriate at that time. However, if an "in person" meeting is not possible, the meeting would be held via Zoom or other audio/visual meeting application. Public interface with the Board via the meeting application should be maximized.



Moving to a single March 2020-21 Board meeting provides the greatest time for change to occur regarding Covid-19 protocols and the highest probability of continuing the fundamental Alaska Board of Fisheries value of a public (in person) regulatory process. It will focus the Board and the Department on the issues/proposals that are of an urgent nature and provide a single focal point for the Board and Department's resources. Limiting the Board's agenda is the responsible decision during a pandemic.

- f. Proposals that would normally have been addressed during the 2020-21 Board cycle but were not considered "time sensitive" should not be lost. These proposals would automatically be retained as proposals to be taken up by the Board the next time a specific area/gear type is considered. During the Board's October work session, 2021, the Board would consider when the areas/gear types with limited consideration during the 2021 Board cycle would be addressed, either in cycle or during an amended cycle.

Thank you for seeking public input on the 2020-21 Board of Fisheries meeting cycle. Should the Board believe further considerations need to be made regarding the upcoming, Board cycle. I encourage continued solicitation of public input on this issue.

Regards,

A handwritten signature in blue ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director



From: [Treasure Hunter Lodge Alaska](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Meetings
Date: Monday, August 24, 2020 11:06:14 AM

Please don't delay the meetings!

Meeting in person is preferable but whatever the boards feel is the best approach as long as we stick with the meeting schedule.

Thank you,

Kurt & Trina
Treasure Hunter Lodge LLC-Alaska
www.TreasureHunterLodge.com
www.AlaskaBlackBearHunts.com
907.738.5000



From: [Matt Lawrie](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Possible BoF postponement
Date: Monday, August 24, 2020 10:35:34 AM

Good morning,

In response to your request for comments, I think that holding in-person meetings should likely be postponed until conditions improve, and that a virtual meeting is an inadequate replacement for in person meetings.

As to the specifics of what might constitute an adequate improvement in conditions, I'll leave that up to the medical experts.

I am curious if you plan to reopen calls for proposals if meetings are significantly delayed.

Matt Lawrie

Sent from my iPhone



From: [Nancy Mendenhall](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Conducting meetings: We have been successful in Nome in using Zoom conducting meetings, such as of the school board, where the public has ability to listen, and comment during a space on the agenda. The conversations have gone well, action taken,
Date: Friday, July 24, 2020 8:35:38 AM

Nancy Mendenhall
<http://nancydanielsonmendenhall.strikingly.com>



From: [Randy Zarnke](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG meeting comment
Date: Thursday, July 23, 2020 8:29:57 AM

Schedule the meetings as usual. If the corona situation has gotten worse by Thanksgiving, either postpone or move to an on-line meeting.

Alaska State Legislature



PC15
1 of 2

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REPRESENTATIVE LOUISE STUTES
Rep.Louise.Stutes@akleg.gov
House District 32
Kodiak-Cordova-Yakutat-Seldovia

Session:
Alaska State Capitol, #406
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Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872

Date: August 4th, 2020

To: Märit Carlson-Van Dort, Chair, Alaska Board of Fisheries

Re: Request to Postpone the October 15th-16th Work Session

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

First of all, I'd like to thank you for taking public comments on how to approach the 2020/2021 meeting cycle in light of the surging COVID-19 pandemic. For the time being, we live in a new world, and I applaud your foresight and solicitation of public input.

I am writing to express my strong concerns with conducting the October 15th-16th Work Session in Anchorage either in person or online as I believe both options come with insurmountable challenges.

Based on the current curve of infection, it is clear that this pandemic will still be with us in October. Holding an in-person meeting and allowing full access would certainly be a danger to public health. Further, the only way to make an in-person meeting safe would be to limit the amount of people, thereby diminishing the public's access and ability to participate.

Addressing an online meeting format, I see similar challenges with public access. Board meetings are an opportunity for the public to interact directly with Board members and be intimately involved in the management of our fisheries resources. In short, it is one of the most inclusive public processes we have and so many critical aspects of participation would be lost in an online format. Additionally, holding meetings online would disadvantage access in areas with low bandwidth or for those who are not technologically savvy.

I respectfully request that the Board postpone the October Work Session and reevaluate further meetings as appropriate based on the infection curve in the following months.



Further and God forbid, if the pandemic stays with us through the winter, the Board may want to consider restricting its actions during this meeting cycle to only conservation and emergency concerns until such time as it is safe to meet in person.

Thank you for your consideration and service to Alaskans.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

Representative Louise Stutes
Chair, House Special Committee on Fisheries
Alaska State Legislature



Cc: Glenn Haight, Executive Director, Alaska Board of Fisheries Support Section
Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game
John Moller, Policy Advisor, Office of the Governor



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

July 27, 2020

To: ADF&G Boards Support Section
Board of Game
PO Box 115526
Juneau, AK 99811-5526

Re: Comments on Covid 19, possible virtual online 2021 Board of Game meetings, telephonic testimony.

Dear Board Members,

Board Support has asked for comments and input from the public regarding the Covid 19 pandemic and whether 2021 Board of Game meetings should be conducted as normal, or virtually online with telephonic public testimony. Here are the 2 questions asked that pertain to the Board of Game and the response from Resident Hunters of Alaska.

- (1) *Should the boards postpone the 2020/2021 meeting schedule until conditions improve? What factors should be considered before in-person meetings are held?*

First, we don't believe meetings should be completely postponed, as the three-year cycle already seems too long between regulatory meetings. The next Board of Game meeting is in Wasilla in January of 2021, which is 6 months away. If the state continues to have rising Covid 19 cases and cannot bring down total percentage of people infected, and there are still concerns over large in-person gatherings, then an in-person meeting would not be in the best interest of the public or the Board.

We just don't know yet how things will pan out six months from now. The decision on whether to hold an in-person meeting or virtual online meeting will need to be made well ahead of time. Speaking for myself, I often will book hotel and airfare two months ahead of a meeting and make plans to attend for a week or more. And Board Support likely needs to book hotel and accommodations and meeting room months in advance. Which means Board Support will have to guess, based on where the state stands with the coronavirus this fall, whether to go ahead with in-person meetings, which is not an enviable position. We suggest that Board support plan ahead for a virtual meeting in lieu of an in-person meeting should conditions with Covid 19 not improve.



(2) *Would an online virtual board meeting with an option to take testimony telephonically be adequate for conducting board meetings?*

We believe that an online virtual meeting with call-in oral testimony from the public is preferable to completely postponing meetings. The board already takes oral testimony from AC members who cannot make the meeting in person, and those have gone over well just using a cell phone on speaker held up to microphone. A real call-in system would certainly work fine for oral testimony.

However, to avoid a lot of missed calls, and 2nd calls, some kind of sign-in system would be needed and participants would have to be given some kind of real timeframe in which to call in, rather than spend hours with a phone to their ear. As it works now, a sheet is posted on the back wall of the meeting so those who signed up to testify can see what number in the docket they are, but that doesn't really give them a sense of what time they will be called, due to some testimony going on longer or shorter than normal. Those who want to testify are still going to need a copy of the public testimony sheet, or something to provide them a timeline of when their turn to testify will come up. Above all we do not want the public to be disenfranchised in any way from being able to provide public comments to a virtual meeting.

Regarding RCs (Record Copies), the Board will also need a means for the public to email or send in RCs as the meeting is held. Currently the board requires 20 printed hard copies for an RC to be accepted by the Board. Without a means to provide hard copies, some kind of other allowance will be needed, likely which means Board support will have to accept RCs via email or fax, and get those to board members. RCs are critically important as the meeting is held to update and clarify information from ADFG and from the public.

Thank you for the opportunity to comment,

Mark Richards
Executive Director Resident Hunters of Alaska
(907) 371-7436
info@residenthuntersofalaska.org



From: [office](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: BOF meeting
Date: Thursday, July 23, 2020 8:18:15 AM

I think the meetings should be canceled until were safe to proceed with public meetings again ! the “public” live input is a very important part of the process

Thanks
Ron Opheim
F/V Chatham
Wrangell AK



Virus-free. www.avast.com



From: [Ryan Nenaber](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#); [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Public Comment on the 2020/2021 Meeting Cycle
Date: Thursday, July 23, 2020 7:40:53 AM

Dear ADFG,

1. Should the boards postpone the 2020/2021 meeting schedule until conditions improve? What factors should be considered before in-person meetings are held?

-In person factors: social distancing in facility - spaced seating; mask wearing; have folks sanitize or wash hands when arrive; wipe down chairs before people arrive and have them wipe them down when we leave; could maintain a list of participants for contact tracing if you want (like at the barber shop).

-Virtual meeting factors: It will probably be preferred for your younger folks who are not intimidated by the tech. but you will probably lose out on the older crowd and thus their wisdom. Definitely the safer and more convenient option for the younger crowd.

2. Would an on-line virtual board meeting with an option for taking testimony telephonically be adequate for conducting board meetings?

Other than missing out on the older audience, of course it would be adequate. It is adequate for most everything now days.

Thanks,
Ryan Nenaber

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



August 31, 2020

Glenn Haight
ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Sitka Tribe of Alaska's Comments on the Board of Fisheries/Game 2020/2021

Dear Mr. Haight:

Sitka Tribe of Alaska (STA) is the federally recognized tribal government for more than 4,400 enrolled tribal citizens in Sitka, Alaska, organized under the Indian Reorganization Act of 1934 as amended. STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens and their use of the Sitka Tribe traditional territory.

STA supports the postponement of the in person 2020/2021 meeting cycle until conditions improve. Both the CDC and the Alaska Department of Health and Social Services identify these types of gatherings as high risk to increasing the spread of COVID-19. In-person meetings not only increase the COVID-19 exposure risk for the attendees and the communities they travel back home too, but also significantly increases the risk for the community hosting the event. In-person meetings should be postponed until the CDC declares the coronavirus pandemic is over.

STA is also opposed to on-line virtual meetings as they have the potential to limit the ability of stakeholders to participate in the process. These limitations arise from the lack access to or knowledge of internet technology. Internet and telephonic access in rural Alaska are far from reliable and a communication outage of this nature has the potential to prevent entire communities from participating in meetings that could have a profound effect on resources they rely on or their ability to access those resources.

If you have any questions regarding these comments contact STA Resource Protection Director Jeff Feldpausch at (907)747-7469 or email jeff.feldpausch@sitkatriben-sn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathy Hope Erickson'. The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

KathyHope Erickson



Southeast Alaska Fishermen's Alliance



PC20
1 of 2

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-917-5470

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

August 29, 2020

Alaska Dept of Fish & Game
Board of Fisheries, Board Support
Glenn Haight, Executive Director
P.O. Box 115526
Juneau, AK 99811-5526

RE: Comments on 20/21 Meeting Cycle

Dear Glenn and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) respectfully requests that the 20/21 board meetings be postponed until a time when an in-person meeting would be safe to be held with no restrictions. The Board of Fish process works best with interaction between all the participants, ADF&G and the Board of Fish members. During the Southeast cycle and probably within all regions there is generally compromise positions on proposals developed by interactions between user groups, Board members and with information from ADF&G. Without the ability to have the in-person interactions, the participants will not be able to provide the Board with possible solutions. This takes away the very aspect that makes the Board of Fish process as great as it is. A virtual meeting would not have the same results nor would there be an ability to interact with the Board members particularly if you are meeting with them for the first time.

For proposals that were submitted for the 20/21 cycle dealing with a sunset clause give the Dept EO authority to extend the current regulations for a year or until an in-person meeting is scheduled.

Stocks of Concern the Dept generally has the ability and tools to make restrictions as necessary to protect the stock. If ADF&G don't feel that they have the tools or it would be too allocative to take action, hold a special meeting on just the stock of concern but maybe



consider before taking final action to schedule several meetings, one to hear about the stock of concern with the Dept's suggested action plan, allow the public time (a week) to provide input into the plan and for board members to make themselves available to phone conversations with the public and then hold another hearing to take action.

For any proposal that is considered urgent because the regular meeting isn't being held, allow for emergency petitions to be submitted as long as it meets the criteria for an emergency petition.

Please postpone the 20/21 Board cycle and maintain the public process as it was meant to be.

Sincerely,

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

Kathy Hansen
Executive Director



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

August 24, 2020

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

Re: BOF Meetings During the 2020/2021 Meeting Cycle

Dear Chairman Morisky and the Alaska Board of Fisheries,

Thank you for the opportunity to comment on how the BOF should proceed due to the Covid pandemic. The following are Southeast Alaska Seiners Association (SEAS) views to your questions-

- (1) If the meeting can not take place in person, there should be no on-line virtual Board meeting. Existing regulations currently in place for the 2020 season should be extended through the 2021 season, and remain in place until such time that we can resume the incredibly open and inclusive process Alaska is famous for.
- (2) There should be NO completely on-line virtual board meeting. It's fine to do some "housekeeping" items virtually, but major decisions about adjusting time and area and changing how fisheries are conducted can not adequately have true public input without an in-person meeting. Peoples' livelihoods depend on decisions the BOF makes. Board members should want to see and hear from the people affected when making decisions. If F&G staff believe "stocks of concern" plans already under an action plan need to be adjusted, that is one area that might be able to be done with a virtual meeting.
- (3) A significant amount of new and updated information is provided at the meeting; and stakeholders have to assimilate, digest, and discuss with F&G and the BOF how this new information might change a position on a particular proposal. That process, cannot adequately happen in a virtual meeting. Everyone is having side bars with staff and other user groups to try to come to consensus on a particular issue; that is the true value of this process, and it will be lost in a virtual meeting. So much of the editing of an initial "problematic proposal" is hashed



out at the meeting by all participants. Problems and changes are fleshed out and, in the end, there is a “positive proposal” addressing needs and concerns for proper management of the resource. SEAS’ just can’t see how this can happen in a virtual format. For those reasons, we circle back to our comments in (1) No virtual meeting of the BOF for the 2020/2021 meeting cycle.

Thank you for your consideration of our views and opinions on this matter. Our office can be reached at the email or phone number provided if you would like to further discuss this issue.

Sincerely,

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

Susan Doherty
Executive Director SEAS



From: [steve merritt](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: comments for 20/21 board cycle
Date: Wednesday, July 22, 2020 1:55:44 PM

Hello Steve Merritt here.

I am responding to your request for comment on the upcoming board of fisheries meeting cycle.

I think it best to postpone the meetings until it is safer for all to participate. Using the online version really takes out the participation of the smaller less techy communities thru out the Southeast panhandle. It would be better that an in person meeting be held, just at a future date than is what has been scheduled.

I have participated in just about every board of fisheries meeting since the 90s. It is a good process but setting it up to fit social distancing and the like simply is not realistic. Just moving in and out of the meeting room and hallways would negate all other forms of preparation for social distancing. Sincerely Steve Merritt



From: [Tad Fujioka](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Re: BoF Mtg in Covid environment
Date: Friday, August 14, 2020 7:16:10 PM

Board Support:

In response to your request for public comments regarding how Board of Fisheries meetings ought to be conducted during this pandemic, I offer the following thoughts:

- 1) The two largest meetings (PWS/Copper River and SE) should be postponed until it is safe to hold these meetings in person. To attempt to conduct virtual meetings as lengthy and with as many participants as is typical of these meetings would be torturous and ineffective. Public participation is a unique and vital part of Alaska's management. To go through the motions of holding a meeting while knowing that the end results will be vastly inferior would be a waste of resources. These two meetings can be immediately rescheduled to time TBA as there is no reason to expect that a vaccine will be widely available or the pandemic to otherwise be over by December or January.
- 2) It is possible that the statewide shellfish meeting may be able to be held in person if an aggressive vaccine schedule is followed. Alternatively, this meeting with many fewer participants than the PWS or SE meetings might be able to be conducted virtually with a greater degree of interaction between board members and the public provided that Covid levels have been reduced to the point that members of the public who do not have the adequate Internet bandwidth at home can utilize local ADF&G offices to participate. It would be unreasonable for Board Support to expect that all members of the public, especially those who live in rural areas can access a virtual meeting solely with their own resources. If health concerns do not allow for the public to utilize ADF&G offices, it might be possible to conduct this (or other meetings with relatively light agendas) entirely via telephonic/written/emailed communication. Any telephonic testimony should be transcribed and the text made available to the public as rapidly as possible during the meeting so that the public is not required to maintain continuous real-time participation in order to stay fully informed. At any rate, a decision about the format of this meeting which isn't scheduled until March does not need to be made at this time.
- 3) If a regular meeting is postponed, the Board of Fisheries should be encouraged to be liberal in applying the ACR criteria for proposals from that area and the sponsors of proposals that were submitted as part of this regular cycle should be given the opportunity to apply for an ACR for their proposal if they feel that it meets the criteria. The number of proposals that are found to meet the ACR criteria should be a manageable few, and thus could be more easily addressed either via real-time video/audio or with Committee work conducted solely with written/emailed communication. In either case, there should be a provision for the public to submit RCs via email.
- 4) When and if Board Support does decide to hold a virtual video meeting or a non-video meeting, I strongly suggest that the traditional intensive schedule be relaxed. Multiple days of 8 hours in front of a computer screen is not conducive to good decision-making. The traditional need to conduct all business quickly so as to avoid disrupting work schedules and running up hotel and per diem bills for staff is no longer applicable. Hence the meeting could be spread out over many more days with fewer hours per day, which would improve the



process for board members, staff and public.

Thank you for your consideration,
Tad Fujioka



August 10, 2020

Mr. Glenn Haight
Executive Director
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Haight:

Thank you for your July 22, 2020 email regarding a request for public comment on the 2020/2021 meeting cycle for the Board of Fisheries. As president of the Juneau-based Territorial Sportsmen, Inc. (TSI), I am responding to your query on behalf of the TSI board and our nearly 1,400 membership.

As you are aware, Southeast Alaska fisheries issues are diverse, complicated, and challenging for board members as well as for members of the participating public. Added to this is the fact that several new board members have come onboard since the last Southeast meeting three years ago. From our experience, personal interactions with board members at scheduled meetings is critically important for members of the public who have interests and insights on issues that they wish to share and have considered in the decision-making process.

Board proposals are often amended, sometimes multiple times, before their final adoption. Through Alaska's open board process, the public often helps to formulate and guide final amended regulatory products through interactions with board members at breaks, by submitting timely Record Copies (RCs), and by participating in impromptu gatherings to develop acceptable and suitable regulatory language. This would all be lost if the upcoming SE Alaska meeting were to be held online, with the risk of promulgating regulations that lack the benefit of broad, critical, and useful input from various and diverse interests.

TSI believes the current fisheries regulations can withstand another season or two without the need for a board meeting. This belief is based on our knowledge that department staff has Emergency Order (EO) authority to address fisheries conservation issues in a timely manner, and with the knowledge that the Commissioner and board have Emergency Regulation (ER) authority to handle conservation, allocation, or other emergencies, including stocks of concern, without general board meetings.

TSI believes the Fisheries board process can withstand a one or two year break, with the hope



that the COVID pandemic abates or vaccines become readily available. Our preference would be to delay the Southeast meeting for at least one year so that, when the board again takes up Southeast fisheries issues, it can do so with direct and meaningful in-person input that is critical to sound decision making and the public process.

Thank you for the opportunity to provide input. Please don't hesitate to contact me if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Larsen".

Doug Larsen
President, Territorial Sportsmen, Inc.

UNITED SOUTHEAST ALASKA GILLNETTERS



PC25
1 of 3

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

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

August 29, 2020

Alaska Department of Fish and Game
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811

Dear Chairman Carlson- Van Dort and board members,

We appreciate having the opportunity to comment on the status of the conduct of Board of Fisheries meetings for the 2020/2021 meeting season. The Board of Fish process is unique in that it allows for public participation at a very high level. We believe it is a very good system, and should be preserved.

Our position regarding our upcoming Southeast/Yakutat Finfish and Shellfish scheduled for January 4-16 2021 is that we would prefer to have the meeting as scheduled, in the usual manner. We feel it is vitally important for the process that in person conversations between board members and the public, committee of the whole, and even testimony, be part of the conduct of any BOF meeting. We think with social distancing, perhaps masks, and perhaps a boom mic for the committee of a whole, it could be pulled off. If the meeting were to go as scheduled, I, and several of our board members would attend.

For the reasons stated above, we would be opposed to a virtual meeting. We feel that a virtual would compromise an individual's ability to participate. We also feel that having it in person brings a certain civility to the process that may be lost in a virtual setting.

In the event the board does decide to postpone the meeting, there are issues regarding sunset clauses on regulations from an agreement between our organization and Southeast Alaska Seiners at the January 2018 Southeast Finfish meeting. All three state in regulation they will expire with the 2020 season. The three regulations are 5 AAC 33.376 Deep Inlet Terminal Harvest Area Salmon Management Plan, 5 AAC 33.383 Anita Bay Terminal Harvest Area Salmon Management Plan, and 5AAC 33.366 Northern Southeast



Seine Salmon Fishery Management Plan. In the event of the meeting being postponed, assuming it would be rescheduled for the winter of 2022, we would ask that the board grant the department EO authority to manage the aforementioned regulations in replication of 2020 for the 2021 season with respect to those fisheries.

If the meeting is postponed a year, it is unclear to us if the board will push everything out a year, or try to catch up through the next. It would seem that doubling down would be a tremendous workload for the board. It is also unclear to us if there will be a new call for proposals, since everything is being put out a year. If not, will the comment period be extended? I realize that there are a lot of questions, some that have probably not ever been considered until now. We appreciate your service to the state and the opportunity to comment.

Sincerely,

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

Max Worhatch, Executive Director, United Southeast Alaska Gillnetters

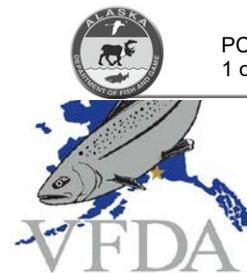


VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com

August 30, 2020

Alaska Dept. of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526



PC26
1 of 1

RE: Public Comment on the 2020/2021 Meeting Cycle for the Board of Fisheries

Dear Sir or Madam,

The Valdez Fisheries Development Association Inc, (VFDA) would like to offer the following comments for the upcoming 2020/2021 meeting cycle, as it relates to mitigation measures for COVID-19. The board has scheduled several public meetings to review fisheries policy and proposals related to regulation and allocation this year. However, our immediate concern is the upcoming Prince William Sound/Upper Copper River and Upper Susitna Finfish and Shellfish meeting scheduled for December 11-17, 2020 in Cordova Alaska.

Due to the uncertainty of the pandemic and often changing state and local mandates concerning travel and public meetings, VFDA has concerns whether this meeting in Cordova will be possible this year due to the need to protect public health. If it cannot, we would respectfully request that the meeting be postponed until conditions allow for PWS stakeholders to participate again in person, in this community on matters critical to their fisheries.

If the board does chose to move ahead with a virtual meeting this year, we would offer these suggestions to ensure a sound public process. Telephonic public testimony can be easily facilitated and is adequate for providing comment to the board. However, other interactions between the board and the public may be much more challenging. The committee of the whole process provides vital opportunity for give and take on the issues, suggestions on substitute language and opportunity for talking through matters of importance to stakeholders. A robust virtual process if available, must be provided to allow the public multiple opportunity to engage and re-engage in the discussion. This would be most beneficial to the public without diminishing or limiting its participation.

The Board of Fisheries process is an important public institution, which provides strong individual perspectives on fisheries issues to both board members and stakeholders. It is our hope that this can remain as we deal with this new health challenge. Thank you for the opportunity to provide comment on this important matter.

Sincerely,

Mike H. Wells,
Executive Director



From: [Will Samuel](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Board of Fisheries and Covid
Date: Monday, August 24, 2020 3:08:16 PM

Dear Board of Fisheries,

I am writing to address your decision regarding the meeting of the Boards during the 2020/2021 cycle.

The BOF provides an essential service for representing the public in management decisions, and that service needs to remain incorporated in our management processes when at all possible.

The COVID-19 pandemic does not lessen the need for informed and reasoned decision making. In fact, it may even increase the need for proper fisheries management, as more individuals are looking at Alaska's bounty as an alternative food source and venue for recreational activities. As worldwide markets change, tourism is restricted, and other impacts of the pandemic are seen, it is vital that we continue to control what we can in order to promote conservation of our resources and support the economy.

If we fail to manage our own resources swiftly and efficiently, we are at risk of seeing more Federal overreach that does not benefit the people or economy of Alaska. It is as important now as ever to show that the people are responsible for deciding the fate of our own fisheries.

Fish and Game Advisory Committees need to stay involved and in order to maintain scientific integrity and provide on-the-ground updates and perspectives. If this is restricted to only online communication, the decision-making process is at risk of becoming flawed due to miscommunication and a lack of clarity. If they cannot complete these tasks, ADF&G and the BOF&G will be failing to carry out their mission statement and sole purpose.

Due to these reasons, the boards should not postpone the meetings. "Until conditions improve" is an undefined term that has no metric to be measured with. In other words, the boards would effectively be postponed indefinitely, which is simply not an option when managing populations and lands that are constantly changing. Board meetings could be held with social distancing and masks in place as desired, but there is no substitute for in-person discussions and decision making. Allowing an optional phone line for public comments and potentially broadcasting the meetings could be useful to accommodate those at-risk individuals, but those who are willing to come in person should be allowed to speak their peace.

Alaska is strong, and it's people depend on the land, fish, and wildlife to support our unique



lifestyle. You have the responsibility of representing our voices, and I urge you to continue to do so in the best way possible.

Thank you,

Will Samuel

--

Will Samuel

907-347-8625

"The best way to predict your future is to create it"

-Abraham Lincoln



From: [Ernie Weiss](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Alvin Osterback](#)
Subject: Comment re Board of Fish meeting cycle during COVID-19
Date: Friday, September 11, 2020 2:46:35 PM

The Board of Fish process is known for the robust public participation at meetings. Input from AC's and members of the public have been critical to past successful decision-making by the Board. Representatives from the Aleutians East Borough attend most Board meetings, especially when the meetings are held in Anchorage, the most accessible site for our staff and our fishermen.

The Aleutians East Borough has canceled all in-person meetings and air travel due to the COVID-19 pandemic. We believe the risks outweigh any benefits and that the Board of Fish should also not meet in-person for now. While it is possible that holding meetings virtually using technology may allow some amount of public interaction with the Board, we fear that important critical input from members of the public may be lost and the Board may not have all the necessary information for making appropriate decisions.

From our view the best solution would be to put the Board of Fisheries meeting cycle on hold for a year or until the pandemic is under control. This is the course of action that will best preserve the integrity of the famous Board of Fish public process.

On behalf of the Aleutians East Borough - thank you for accepting public comment on the important topic of holding Board of Fisheries meetings during the pandemic.

Ernie Weiss
Natural Resources Director
Aleutians East Borough
3380 C Street Suite 205
Anchorage Alaska 99503
907-274-7557
www.aebfish.org



September 11, 2020

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

Members of the Alaska Board of Fisheries,

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

An in-person meeting puts elder and higher risk members of the fishing fleet at risk and potentially excludes them from the public process if they do not feel comfortable attending a meeting in person at this time. Additionally, the typical mixing of residents from many communities around the state at the Board of Fish meetings means that people will be needing to travel in or travel out to attend an in-person meeting and this places additional risk on anyone from any participating community, but especially brings risk to rural communities set to host Board of Fisheries meetings this year.

Additionally, many state employees, particularly within the Department of Fish and Game, must attend Board of Fisheries meetings, and holding the meetings in person would put state employees at a higher risk and potentially forces employees to be in a position that contradicts their personal boundaries and comfort level.

Regarding virtual meetings for the Board of Fisheries, most regular attendees know that the very open public process cannot happen without an in person meeting. A virtual meeting to discuss regulatory language would degrade the quality of the meetings, and potentially exclude valuable perspectives due to a lack of technological access. Further, much of the cooperation between user groups happens during the breaks, at lunch, and after each meeting day, and the



in person access to speak directly with Board members would be lost with a virtual meeting. It is simply not the same, and meetings may have very different outcomes without these important qualities.

Virtual meetings would be a complete shift from the openness of previous Board of Fisheries meetings, and has the potential to change the entire social fabric of the State of Alaska, particularly in coastal communities where regulatory changes in all fisheries have profound impacts on the people, the resource, and the economy.

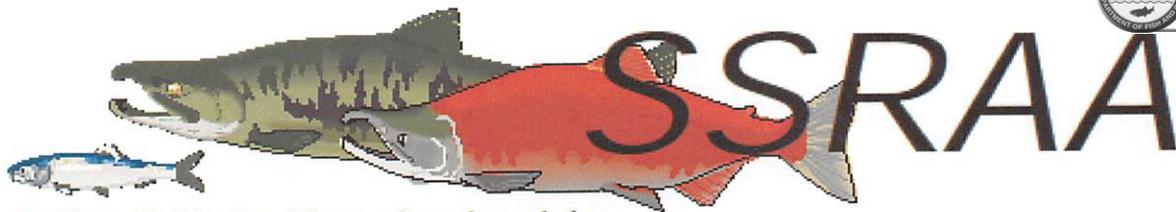
There are also significant ethical concerns for the virtual meeting process, with no oversight by the Department of Law or the public during the deliberations process, when new information is not allowed to be presented. Essentially, there is no way to monitor whether Board members are receiving e-mails, additional documents, or information that may influence the outcomes of proposals.

Finally, there are 4 Board of Fisheries applicants who have been selected to serve by Governor Dunleavy but who have not been confirmed by the Alaska Legislature, and who may not be confirmed by the Legislature prior to several Board of Fisheries meetings that are scheduled. There are significant concerns holding any Board of Fisheries meetings until appointed Board members are confirmed by the Legislature.

With this in mind, we urge the Board to consider postponing the 2020 meeting cycle until 2021. This inevitably and unfortunately means that regulatory changes will be delayed longer than is ideal, however, it also means that regulatory impacts to our fisheries will not occur without adequate, comprehensive, and valid public process and access to the Board of Fisheries meetings. Ultimately, the potential for better and greater public involvement and more fair regulatory outcomes will occur if the current meeting cycle is postponed.

Thank you for your time and consideration of our comments,

Chelsea Haisman
Executive Director



Southern SE Regional Aquaculture Association

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

September 10, 2020

Alaska Board of Fisheries

Juneau, Alaska

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

Re: Board meeting format

Dear members of the Board of Fisheries,

Southern Southeast Regional Aquaculture Association is a regional non-profit salmon hatchery association formed under state and federal law, originally incorporated in 1976. SSRAA, along with the State's other regional hatchery associations and the associated Private Non-Profit hatcheries in Alaska, have a substantial interest in how the Board of Fisheries meetings are conducted during the COVID-19 pandemic.

SSRAA recognizes that the Board has a very participative process, with direct interaction among participants and Board members on issues of mutual concern. This unique and well-honed system simply does not translate to an online format. At the same time, we recognize that there is also a substantial risk of COVID-19 transmission if meetings are held in the traditional fashion.

SSRAA urges the Board to carefully consider input on this topic from the commercial gear groups who are fully engaged in all aspects of regulations that affect their livelihoods. SSRAA also encourages the Board to engage in a process that identifies proposals which are of the most critical importance to users and address those matters sooner rather than later, considering the range of meeting/public input options that are available. As an example, SSRAA has the Port Saint Nicholas THA/SHA proposals before the Board at its *Southeast and Yakutat Finfish and Shellfish* meeting in January 2021. The increased volume of returning chinook to this area beginning in 2021 needs to be addressed prior to the summer season in order to conduct fair, orderly and non-allocative fisheries. To put off these decisions is poor management and should not occur.

Thank you for your consideration of these comments.

Sincerely,

David Landis, General Manager