
ALASKA BOARD OF FISHERIES
Committee on Process Meeting
Web-conference | January 18, 2024

On-Time Public Comments

Brennan, KevinPC1

Murray, JohnPC2

United Fishermen of AlaskaPC3



Submitted by: Kevin Brennan

Community of Residence: Kodiak, Alaska

Comment:

Kevin Brennan, commenting on 10 minute testimony for those with Traditional Knowledge:

I am in FAVOR of this proposed change in rules for Testimony during Alaska Board of Fisheries meetings.

I was born in the mid 1900s. I've spent most of my life in and around Kodiak. I received extensive knowledge of the area from my Elders; including its abundant resources, and the methods and means that Kodiak area salmon, herring, crab, halibut, cod and rockfish are harvested. I have been deeply involved in subsistence, commercial and sport fisheries. It is my Culture. It is a huge part of my life.

I tried to learn well and I think I succeeded. I firmly believe that it would be beneficial to BOF members and the regulatory process for such TK holders to be able to have more than 3 minutes to help the Board members understand some of the unique properties of the area, it's fishery resource, and their traditional users and uses.

Three minutes is not enough time to discuss such a huge subject!!! Even ACs can barely cover the many proposals they have studied. Perhaps the ACs need more time to testify?!

I do fear that this will add significantly to the time it takes the BOF to complete "Public Comments". But if the BOF wants to get it right is an extra day or two at a meeting such a bad thing??

I do represent unique Traditional Knowledge, many generations long.

How?

I came to Kodiak over 45 years ago. I came here from Bristol Bay. I learned from my 'community'. I learned from great and grand 'Uncles' and older 'Brothers'. Some of those I learned from were 2 to 3 generations older than me. Some of those I learned from, those most closely related to me within my community, were one generation back, or of my generation. (Please Note: The definition of 'generation' is complex at best, but currently can be said to be as short as every 15 years, though some definitions claim longer, like 20-25 years).

My community was Kodiak subsistence, commercial, and sport fisheries, users, managers, and researchers. My family was Area Finfish Fisheries Managers (both ADF&G and USFWS). When I came to Kodiak, there were several older Kodiak Area Finfish Managers still living. They taught me, and were mentors, friends and family. I was welcome in their homes, had many meals with some and knew their children. I began working with two more great managers that later became Kodiak Area Finfish Managers.

I spent over 40 years learning. I continued to stay in that community, until I retired after I was awarded the title of ADF&G Finfish Kodiak Area Manager for subsistence and commercial fisheries. I've attended over 20 BOF meetings, as well as committees, as plus had continued education and training.

I am not interested in criticizing the current Board, ADF&G staff or any particular group of resource users or interested parties.

But I also KNOW, from 45 years of personal experience, that department staff and State or Federal officials can have personal biases. And, Department staff are OFTEN told that there are some things that they CANNOT say (!), by direct instruction from Commissioners, Directors, or Regional Supervisors. Area Managers may be stifled in their reports and testimony by upper echelon staff or elected officials. Their careers are 'on the line' if they don't toe the line!

Had I known of this new BOF comment process, I would have taken the opportunity to sign up for TK comments at the recent Kodiak Finfish BOF meeting. It was My mistake for not paying attention to the pre-Board meeting announcements. I did talk with the Committee chair at the meeting but missed the deadline to sign up.

There were others in attendance at the Kodiak meeting that fit the Committee's stated TK qualifications for the extra time to comment, mainly old fishing families that have many generation of DIRECT knowledge of Kodiak fisheries. Many would have signed up for TK status had they known! Respectfully, I believe that Many assumed that Race was part of the criteria!! Many thought only descendants of indigenous Kodiak ancestors would be given the extra time!

I am so happy to learn that being defined as an 'Alaska Native' is not the limiter! I believe that if the Board tried to limit this new category of commentators (with 10 minutes to testify) in such a way, then lawsuits would follow! After all, we are all Americans first, Alaskans second and area residents third.

Thank you to the BOF and the committee for allowing me to testify, I hope to join the Webinar meeting on Jan 18th. I am very interested in the outcome of that meeting.

Sincerely,

Kevin Brennan

Retired Kodiak Advisory Committee secretary;

Retired Kodiak Area Finfish Subsistence and Commercial Fisheries Management Biologist (FB III);

Retired Executive Director of the Kodiak Regional Aquaculture Association (salmon education, research, and enhancement).

Current subsistence and sport fisher of salmon, halibut, rockfish, herring, crab and cray fish!



Submitted by: John Murray

Community of Residence: Sitka

Comment:

I support incorporation of Traditional Knowledge into the board process.

As a long time member of the Sitka AC - TK comes up on as a regular topic during public comments during our meetings. This is especially true during public comments that deal with the Sitka Sac Roe fishery and subsistence harvest of herring eggs ,for example. To be honest I personally don't know how to integrate public comments dealing with TK into the AC's discussions on BOF proposals. It is more of a feeling then numbers ,data or reports.

While I find it of value to the discussion as a whole ,there is little weight put on comments about TK. It is almost an abstract concept. TK can also run contrary to maximum sustains yield of fish and game resources at times.

I feel ADFG staff isn't trained or taught TK. So except for the ADFG subsistence division it is given little to no acknowledgement. I suppose it is looked at as not real science? Or supposition to real biological works.?

After looking at work done by ADFG with residents of western / northwest Alaska dealing with marine mammals, climate change etc. I see great value in the overall concept of TK to add the base of knowledge via TK.

I'm not sure without particular guidance and thought how the BOF can implement TK into the process? I look forward to listening and learning how this might be done.

It is kinda of an enigma. Somewhat easy to define but hard to put into practice in certain areas . Even though as a hunter ,gatherer and commercial fisherman I regularly use TK and try and pass it along to others in my area.

A final thought . Bringing TK into the BOF process shows great respect to the people who are trying to convey other values . While these values aren't monetary they still hold great value to the ecosystem and community at large.

Sincerely John Murray Sitka



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Alaska Board of Fisheries
Committee on Process, Management, and Research Needs
Submitted Via Portal

January 15, 2024

RE: Traditional Knowledge Report Comments, Post Kodiak Finfish Meeting

Dear Chair Carlson-Van Dort and Committee,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 37 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. We'd like to thank you for providing the opportunity to comment on the incorporation of Traditional Knowledge (TK) reports at Board of Fisheries meetings. After observing the inaugural roll out of TK reports at the board's Kodiak Finfish meeting, UFA has several points for the committee to consider for TK reports moving forward which will be outlined in subsequent paragraphs.

The definition of "Traditional Knowledge" provided by the Board is vague and will create confusion, frustration, and unnecessary lack of efficiency in the public process. Individuals both familiar and unfamiliar with the Board process have commented that they are unsure as to whether their situation qualifies them to speak under the TK report section. The lack of clarity in the definition creates very broad and unnecessary latitude, rather than clear guidance and boundaries, to those choosing to sign up under the category. The time allowed per TK speaker is ten minutes and there is potential for a significant increase in the length of time needed to hear public testimony.

The Board has not made clear what tradeoffs justify either increasing Board meetings length or keeping meeting length consistent and instead taking time away from other testifiers or board deliberations. Board meetings already require a very significant time commitment for Board Members and participants, and we believe it is unlikely that additional time will be added to meetings on the schedule. If the newly added TK report component takes significant time to complete, then it seems apparent that there will be less time for the "business" portion of the meeting to take place. We are very concerned about potentially taking time away from individuals whose fisheries and livelihoods are being discussed and debated. UFA is not opposed to TK reports but does recommend that the definition be clarified and refined so that

everyone knows what to expect and how to appropriately use the Board process in an orderly manner.

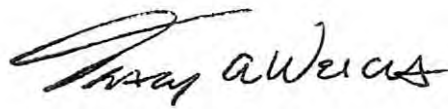
As stated during the Kodiak Finfish meeting, Traditional Knowledge reports should be relevant to proposals in front of the Board. For example, while it was interesting to learn about the invasive crayfish issue in Kodiak during the Kodiak Finfish meeting, this subject matter was not related to any proposal or business before the Board at that meeting. Furthermore, the individual giving this testimony under TK acknowledged that it was not actually Traditional Knowledge as it involved an invasive species that has been present on Kodiak only a few decades. Again, we are concerned with existing time constraints and finite bandwidth of Board, staff, and public. If TK testimony and subsequent comments do not fit within TK and are not relevant to business before the board, then it needs to be clear that the Chair will cut testifiers off or redirect their comments to relevant information. This process should be transparent, fair, and ultimately designed to provide the Board and public with information relevant to decisions before the Board in any given meeting.

Thank you for the opportunity to provide comment.

Regards,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association