



Kodiak Salmon Work Group  
c/o Kodiak Regional Aquaculture Association  
104 Center Ave., Suite 205  
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RC 115

## **Summary Comments Proposal 37 and RC-09**

**Kodiak Salmon Workgroup Requests that the Alaska Board of Fisheries give notice that after taking testimony on Proposal 37 during the upper Cook Inlet meeting, the board will deliberate on the proposal and take action at the Board's "state wide" meeting in March.**

At the Lower Cook Inlet meeting in Seward, UCIDA submitted a proposed amendment (RC 09) that highjacked proposal 37 entirely. Their new plan would include 4 management areas and all species. However, only Kodiak fisheries would be adversely affected. The Board's intention to allow public comment on RC-09 at the Kodiak meeting may have been well-intended but the process gives the appearance of a stakeholder group circumventing the regular process for submitting proposals.

**This irregular action raises some serious questions:**

- 1 Did the action to seek public comment on a public comment make the suggested amendment a board generated proposal?**
- 2 The language bears no resemblance with original proposal 37. If RC 09 is intended to be a real amendment to proposal 37, what happens to the original proposal 37?**
- 3 Why were no other RC's put out for public comment, only one highly allocative new proposal involving Kodiak? Is there precedent for this? Will the board now start allowing late proposals into the process if they are identified as "amendments"?**

- 4 Will the public and staff have sufficient time to learn about and absorb the objectionable impacts of the proposed plan on Kodiak's fishery?**
- 5 Why isn't there a justification with the proposed action as is required on all other proposals that are timely submitted?**
- 6 The suggested management plan in RC 09 never states a problem that needs addressing. Without a problem stated, how is the proposal relevant?**
- 7 Good public policy would dictate that late date submissions such as RC-09 be treated like any other RC and not elevated to a special status.**
- 8 The board now owns the irregular amendment. It doesn't state a problem, contains no justification, is several months late, and makes the board look biased before a meeting. Any action to move RC 09 taints the process, taints the board, and sets a dangerous precedent.**