



February 28, 2025

House Resources Committee
Alaska State Capitol
Juneau, AK 99801

RE: HB 33 – Conflict of Interest Bill

Dear House Resources Committee Chairs and Committee Members:

Kenai River Sportfishing Association (KRSA) is a 501(c)3 nonprofit dedicated to ensuring the sustainability of the world's premier sportfishing river -- the Kenai. Since 1984, the Association has been a leading advocate for fisheries conservation in Alaska, working diligently to ensure that Alaska's sportfishing and personal use fishery rights are protected and the fisheries are healthy for generations to come.

KRSA has long advocated against modifying the ethical standards surrounding conflicts of interest for board members serving on the Board of Fish. The current conflict of interest procedures already allow for a conflicted board member to participate in the public process on matters where they have a direct financial interest.

This is stated in the HB 33 Research ADF&G Policy on Recusal:

“Recused board member participation: Board members who are recused from taking official action on a proposal(s) may participate as a general member of the public, including providing public testimony and discussing the proposal as a member of the public in the Committee of the Whole process.”

To further clarify, board members can share their knowledge, expertise, and opinion on proposals in which they are conflicted, but as a member of the general public, and must remove themselves from the board table during board deliberations and voting.

During a Board of Fish meeting, public testimony allows three minutes per individual to speak. After which, the Board can ask any questions they have of the testifier. In the next step, the Committee of the Whole process, the Board can interact with and direct questions to state agencies, to proponents or opponents of proposals, and representatives of ADF&G Advisory Councils. Every member of the public, including conflicted members, is allowed another ten minutes to speak about the specific proposal under consideration.

Following the Committee of the Whole work, the Board enters into their formal deliberations. Think of this step as the closing arguments on a matter, and the final opportunity for board members to

sway one another. During this step, conflicted members, as you know, recuse themselves and join the public in observing the deliberations without directly influencing them.

This segregation is important, because in the case of the Board of Fish, “deliberations” are a formal phase of the meeting. This time is reserved solely to the Board and any questions they may have of the department. This is the time when the Board ensures that their decision-making process has incorporated directives under statute, and where they establish board intent. It sets the record. I’ll say it another way: the “deliberations” phase establishes how a proposal may be implemented and interpreted by the Department of Fish and Game or Department of Law.

Allowing a conflicted individual to have influence over how allocations or regulations are interpreted or implemented, even if the influence isn’t a final vote, is inappropriate.

In conclusion, KRSA believes loosening the ethical standards to allow board members influence on proposals that they have a financial interest in, will only undermine the integrity of the board and we believe that this bill is not in the public’s best interest.

Respectfully,

A handwritten signature in cursive script that reads "Shannon Martin".

Shannon Martin
Executive Director

Dear Rep. Stutes and committee members,

First, thank you for the opportunity to comment on HB33. I am strongly opposed to the passage of HB33, with the following justification.

As a retired wildlife biologist of over 28 years with the Department of Fish and Game plus six consecutive terms on the Board of Game, as chairman for most of those 18 years, I have had numerous opportunities to witness conflicts of interest and the public's concerns about conflicts. The Board of Game did not allow a board member to deliberate or participate at any level when addressing a proposal if they had a financial or personal interest in the proposal's outcome.

Prior to each meeting scheduled for Board action, members were required to provide a disclosure statement to identify any potential conflicts they may have during deliberations. Conflicts ranged from increasing the season length or bag limit in an area where a guide, on the Board, operated or planned to operate to changing a method and means regulation to allow use of certain equipment that a Board member sold in their store. During disclosure, Board members would identify which proposals they may be in conflict with and the chairman would request the person to step down, from the Board seat, during discussions on those proposals.

This open disclosure practice and temporarily stepping down by a Board member made the public aware that any conflict of interest would not be allowed, even if they were not allowed to vote. As we all have seen, as strong Board member can have a powerful influence on less experienced members, resulting in swayed votes.

I understand that these members do have experience and knowledge to share but that information can be obtained during public testimony. Members that have potential conflicts can ask questions to testifiers to cover the points they want other members to hear.

Ted Spraker

Soldotna, AK 99669



Chitina Dipnetters Association
PO Box 35230
Ft. Wainwright, AK 99703
Chuck Derrick, Pres.
cderrick@chitinadipnetters.com

January 27, 2026
Senate Community and Regional Affairs Committee
Alaska State Capitol
Juneau, AK 99801

RE: HB 33 – Conflict of Interest Bill

Dear Chair Senator Merrick and committee membership

The Chitina Dipnetters Association, a non-profit 501(c) (4) organization, representing the 9,000 annual Alaska resident personal use dipnetters, who supplement their families' food supply by harvesting salmon from the Copper River, is **opposed** to the passage of HB33.

BOF & BOG ethical standards dealing with member conflict of interest are in place and have placed checks and balances on members to prevent unfair participation in board proposal deliberations where that member has a financial or personal interest in matters undertaken in the proposal. In such a circumstance, the conflicted member, at time of deliberation, must recuse themselves and sit out as a member of the public until deliberations are concluded on the proposal where the conflict of interest occurs.

HB33 seeks to do away with these checks and balances. This bill would create unfair advantage for someone who has financial interest in an Alaska fishery or game resource, over those users of the resource who are harvesting food for their family. It could also create unfair advantage for one commercial user group over another who harvest the same resource.

HB33 offers nothing positive for state residents, only unfair advantage to a few. To this end, The Chitina Dipnetters Assn. recommends non-passage of HB33 out of your committee.

Thank you,
Chuck Derrick
president- CDA