

RE: HB 125 Board of Fisheries needs diverse Science voices for balance

I am in full support of crafting a more meaningful balance to the BOF process, but I feel HB 125 needs cautious amendments to more deeply evaluate where the BOF process is actually failing our fish populations into closure.

The largest imbalance I have noticed in 40 years of observing this process, and experience in the fishing industry, is disparity or obscurity of best available information imparted to board members from the ADFG when questions are asked of them during deliberations. The amount of information is overwhelming and daunting for this Board.

The department has a one voice policy that sometimes lacks open independence of thought. The local staff with its expertise needs leeway to answer questions openly without fear of reprisal and independent scientists available to debate controversial issues.

Without these open discussions our fish decline into depleted and depressed status.

The department is "at the pleasure of the governor" so when ADFG is the sole contributor submitting its perspective to BOF and or the legislature, results in a narrow band of information sustaining living resources of the state. The political price using the sole executive branch can not serve Alaska's fisheries resources. Here in itself is a glaring imbalance in the BOF process.

When the Alaska constitution was written, we had learned this same lesson about management. "Science" shrouded with politics solely based on utilization and development lacks the third constitutional tenet mandated... Conservation. Precaution during uncertainty provides balance...without precautionary conservation, sustainability thresholds are breeched in living populations and take them over the precipice to decline.

By evaluating regulations from BOF policies adopted from obscure guidance by the department has chronically proven resulting fish declines. Evaluating recorded deliberations attest to this.

Accurate decision making must have an unbiased balance of defensible ecosystem information brought to the board to provide accurate conclusions based on accountable policy. Accountable policy equates to thriving instead of declining populations.

To sustain fish themselves on life stage history, reproductive strategy, food web consideration , ecosystem chemical, physical, biological and climatic interaction requires expression.

The BOF is not simply an allocative body between battling constituencies. AS 16.05.251 mandates conservation. Presently precautionary ecosystem management is sorely lacking in the departments management strategy so the term scientific may want to be more narrowly defined to bring the detailed sustainable needs of the fish to thrive in this arena.

The Policy for sustainable fisheries, 5 AAC 39.222 provides a strategy to guide the department and the Board of Fisheries. Is this followed? It may help if this regulation becomes statute.

I am cautious of NOAA due to how politics is manifested in the North Pacific Fisheries Management Council. Also allowing the governor to control rejection of AFN or science seats again only compounds this Executive branch imbalance so I oppose this.

There are other options to consider how to add the sorely needed independent scientific voice for diversity of thought to base decisions on:

- two (2) “independent” fisheries scientists free from the executive branch
- ex-officio non-voting scientific members possibly from the university
- academy of science panel to be consulted on fisheries issues as is utilized in Washington state. This panel to even remote into meetings when board questions require more detailed answers to gain broader knowledge from friendly debate on a broader range of the best available information than department answers which often are obscure.
- A statutory clause requiring department presentations detail divergent or precautionary science with defensible reasons why the department disagrees.

Allowing the actual on the ground employees of ADFG must be allowed to fully debate and voice the science they were hired to impart. Staff get seriously censored from imparting their knowledge to you in the legislature as well as the boards.

This critical unheard voice must be heard.

- 1.Utilization,
2. development
3. conservation.

Conservation is the third leg of the stool, the third triplet. Conservation in deed and policy in action not just word. To continue considering living resource as an expendable infinite commodity without serious precaution will and does collapse our fisheries as clearly warned in the constitution from territorial experience. Limiting diverse council jeopardizes our fish.

Thank you kindly for your consideration on this critical HB 125 that warrants further discussion.

Kind Regards,

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