



**Kenai  
Area  
Fisherman's  
Coalition**

PROTECTING YOUR FISHING RIGHTS & RESOURCES

P. O. Box 375 Kenai, Ak. 99611

Alaska Department of Fish & Game  
Board Support Section  
P.O. Box 115526  
Juneau, Ak. 99811-5526

March 14, 2013

Dear BOF Members,

We would like to comment on your Draft Criteria for Development of Board-Generated Proposals. In particular we would like to address item 4 referring to adequate opportunity for public comment.

In our opinion, this has been an area lacking acceptability in public preview because of insufficient and inconsistent direction in how the Board has addressed this area. In the past there have been times when, during the waning hours of deliberations, a couple of board members would meet with influencing special interest representatives and craft a Board-Generated proposal. Then, when they reconvened a board member would make a motion to consider the proposal and after a usually brief discussion or short break they would vote on it. The public and often AC chairs are sitting there dumbfounded by the lack of their ability to weigh in with comments before a vote is taken.

Powerful special interest groups have found that this mechanism is favorable to their agenda because they can often get a favorable outcome without the public knowing what discussions went into the drafting of the proposal or their ability to have their voices heard at this juncture. However it has been handled in the past, it has never been a transparent or consistent process from our point of view.

We would suggest that if a Board-Generated proposal is brought before the Board for consideration the chairman would call for a recess so that copies could be made available to the public. Then when the Board is brought back in session a public comment period would be allowed before further board discussion and a decision is rendered. This way everything is transparent and a truly public process has been afforded.

Respectfully Submitted,

Dwight Kramer  
Chairman - Kenai Area Fisherman's Coalition