

**Alaska Board of Fisheries
On-Time Advisory Committee Comment List
Work Session
October 18–20, 2016**

Anchorage Fish and Game Advisory Committee (Letter 09/28/2016) AC 01



Submitted By
Anchorage Advisory Committee
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Affiliation

Members of the Alaska Board of Fisheries,

We, are writing to support the intent of the salmon habitat proposal, which is item "n" on the list of non-regulatory proposals being considered at your worksession, and we ask the Board to recommend that the legislature update Alaska's fish habitat permitting laws under Title 16. At our Advisory Committee meeting on September 27, 2016, the AC discussed this proposal after receiving a presentation from its author and testimony from a diverse group of Alaskans who practice subsistence, personal use, commercial, and sport fishing – all in support of the proposal.

Title 16 gives the Department of Fish and Game its authority to issue permits for development projects that may impact fish habitat, but it lacks specific criteria that defines what is or isn't an acceptable level of development activity in Alaska's anadromous fish habitat. The Board of Fish specifically developed the Policy for the Management of Sustainable Salmon Fisheries, to "[...] *ensure conservation of salmon and salmon's required marine and aquatic habitats, protection of customary and traditional subsistence uses and other uses, and the sustained economic health of Alaska's fishing communities.*" (5 AAC 39.222(b))

Over the last decade, significant stakeholder concern has been raised about several development projects that could significantly impact salmon habitat. Much of that public concern seems based on a lack of trust that the permitting process will adequately consider and prevent significant impacts to fish and their habitats. Strengthening the habitat considerations in the permitting process can help restore that public faith, while still allowing potential developers a fair shake in that same process.

While these changes are under the authority of the Legislature, we feel it is important for the Board of Fisheries to urge the Legislature to examine and address these issues. Many parts of these laws have changed little over the years and recent criticisms of the permitting process have highlighted a significant need for improvements to adequately protect salmon habitat and restore the public's faith in the process.

Joel Doner, Chair

Anchorage Advisory Committee