

Petition for finding of emergency and scheduling hearing on biological and allocative impacts that will result from recent changes to Prince William Sound Private Non-Profit Hatchery Management Plans adding 20 million pink salmon egg take to existing permitted capacity

We, the undersigned organizations and individuals, strongly recommend the Alaska Board of Fisheries make a finding of emergency and subsequently schedule a time certain to consider management options for fisheries supported by hatchery pink salmon in Prince William Sound and Lower Cook Inlet in response to recent (April 19, 2018) actions taken by the Prince William Sound Regional Planning Team to amend hatchery management plans to allow for an increase in the number of pink salmon eggs taken by 20 million.

In accordance with 5 AAC 96.625 Joint Board Petition Policy, it is the policy of the boards that a petition will be denied and not schedule for hearing unless the problem outlined in the petition justifies a finding of emergency. In accordance with state policy expressed in AS 44.62.270, emergencies will be held to a minimum and are rarely found to exist.

In this section, an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.

Factors in support of finding of emergency:

1. Hatchery permits are required for the construction and/or operation of a private non-profit salmon hatchery in Alaska. Hatchery permits specify the species and number of salmon that can be incubated at the hatchery, as well as the number released, release sites, broodstock sources, and other conditions of operation.
2. The Alaska Board of Fisheries has limited authority as it relates to hatcheries. The Board may exercise indirect authority over hatchery production by regulating the harvest of hatchery-released fish in the common use fishery, hatchery brood stock and cost-recovery harvests, and by amending those portions of hatchery permits relating to the source and number of salmon eggs, hatchery harvests, and the designation of special harvest areas by the adoption of appropriate regulations. However, Board action that

effectively revokes, or prevents the issuance of, a hatchery permit is probably not authorized.

3. The total number of pink salmon eggs that were taken for rearing in PWS hatcheries in 2016 was 740 million. That same year, 643 million pink salmon fry of hatchery-origin were released into Prince William Sound.
4. Prince William Sound fishermen have the highest hatchery fish catches. In 2017, 45 million salmon returned to the five hatcheries in PWS, accounting for 87 percent of the total salmon harvest. Ninety-three percent of pink salmon were hatchery-origin, and 68 percent of chum salmon were hatchery-origin. In all, PWS hatchery harvest added up to 62 percent of the total with a dockside value of \$64 million.
5. Pink salmon that showed up in streams across Lower Cook Inlet in 2017 weren't all local stocks — in some streams, up to 70 percent were releases from Prince William Sound hatcheries. Prince William Sound hatchery-marked fish were present in every Lower Cook Inlet stream sampled. In Fritz Creek, 70 percent of the 96-fish sampled were from Prince William Sound hatcheries. In Beluga Slough, 56 percent of the 288-fish sampled were from Prince William Sound.
6. The State of Alaska law mandates that hatcheries shall operate without adversely affecting natural stocks of fish - 5 AAC 39.222. Policy for management of sustainable salmon fisheries. (c) (1) (D) effects and interactions of introduced or enhanced salmon stocks on wild salmon stocks should be assessed; wild salmon stocks and fisheries on those stocks should be protected from adverse impacts from artificial propagation and enhancement efforts.
7. In addition to the straying issues observed in Lower Cook Inlet, recent scientific publications have provided cause for great concern over the biological impacts associated with continued release of very large numbers of pink salmon fry into the North Pacific Ocean. "Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean, 1925–2015" Gregory T. Ruggerone and James R. Irvine.
8. It is certainly unforeseen and unexpected that release of millions of additional hatchery-produced pink salmon fry into the marine waters of Prince William Sound without a doubt threatens the biological integrity of wild stocks of pink salmon in Lower Cook Inlet and potentially adds to an already critical ocean rearing situation.

9. It is certainly unforeseen and unexpected that fishing patterns in Lower Cook Inlet could be altered in a manner that affects the traditional allocation of the salmon resource without consultation with the Alaska Board of Fisheries.
10. It is certainly unforeseen and unexpected by the public that the Alaska Department of Fish and Game, the state agency charged with stewardship of the state's salmon resource, would agree to an amendment to the Annual Management Plans for Private Non-Profit Hatcheries in Prince William Sound, providing for a substantial increase in the taking of pink salmon eggs when up to 70 percent of all pink salmon sampled on spawning streams of Lower Cook Inlet in 2017 were of Prince William Sound hatchery origin.

The relief sought by this Emergency Petition would be to have the Alaska Board of Fisheries formally request that the Commissioner of the Alaska Department of Fish and Game put the increased authorization for taking of pink salmon eggs by the Private Non-Profit hatcheries in Prince William Sound on PAUSE until adequate consideration can be given to all the issues associated with this action.



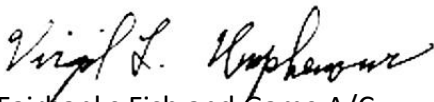
Alaska Outdoor Council



Alaska Sportfishing Association



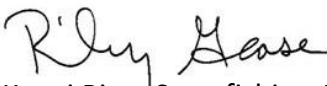
Chitina Dipnetters Association



Fairbanks Fish and Game A/C



Kenai River Professional Guide Association



Kenai River Sportfishing Association



Southcentral Alaska Dipnetters Association



Tsiu River Coalition



Eddie Grasser, Vice President

Alaska Chapter Safari Club International