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Greetings to the Board
Thank-you for considering a Hatchery Committee

I have been in the fishing industry from fishing, processing, as well as fish culture in hatcheries and rehabilitation in the field for 43 years.

Criticism and debate is a great tool that leads to correct decision-making. The Board of Fish can create this missing arena with statewide perspective.

The Board is an integral player, the third leg of the stool, to consider issues of adverse affects surrounding hatchery releases with a magnitude of Category 5 - 1.8 Billion predators into the wild fish pastures.

The department's presentation is troubling from the omission of these complex issues.

Hatcheries confound the crown of State management and the very Certifications of Sustainable Salmon Policy. How can we ignore the loss of trust in the Sustainable Escapement Goals? The dominant goal of ADFG management?

The narrow PWS study needs peer review as there are concerns of the protocol. It presents answers to only two or three questions out of 100 adverse affects recognized in the original legislation and by scientists.

Why are these 100 questions not on the table? Delay is not acceptable. These unanswered complex questions puts wild fish, our state priority, at risk.

This is the purpose of an institutionalized BOF Hatchery Committee into this process. To bring all issues to the table in an open process. A process that continues to monitor, educate, learn and where needed regulate.

The BOF has authorities in statute and regulation that require recognition and action.

A committee would bring the Board up to speed to learn these complexities with the department, to provide oversight and open access over a process that has become exclusive, closed and self-serving.

It would bring a statewide perspective to understand and coordinate the regional and local issues not presently attended to.

The science of hatcheries is a very very large subject with multiple research projects from all over the world. This is far and above the study of PWS.

We need these studies to be systematically reviewed with independent eyes. The board can begin to provide this review through a Hatchery Committee.

With Kind Regards

Thank-you for your attention

Nancy Hillstrand

Kitoi Bay Hatchery does not have an otolith marking program to differentiate hatchery from wild stocks in SEG's for pink salmon.

Pink Salmon 2017 Kodiak Season Summary

"The Kitoi Bay Hatchery pink salmon run was much weaker than expected with approximately 2,000,000 pink salmon harvested in sections near the hatchery (9,700,000 forecast). Kitoi-bound pink salmon were likely harvested along the west and east sides of Kodiak and Afognak islands. Likewise, additional wild stock salmon were likely harvested in areas associated with Kitoi Bay Hatchery. However, the department does not have a stock separation program for pink salmon and is unable to differentiate stocks. There was a cost recovery fishery near the hatchery with sockeye, pink, and chum salmon harvested and sold by the Kodiak Regional Aquaculture Association. "

Pink Salmon 2016 Kodiak Management Report

Kitoi Bay Hatchery cost recovery fishery accounted for 71%, or 792,845, of those fish. Additional hatchery-bound pink salmon were probably harvested along the west side and east side of Kodiak and Afognak islands. However, ADF&G does not have a stock separation program for pink salmon and is unable to differentiate stocks.

Pink Salmon 2015 Kodiak Management Report

Kitoi Bay Hatchery cost recovery fishery accounted for 58%, or 2,889,304, of those fish. Additional Hatchery bound pink salmon were probably harvested along the west side and east side of Kodiak and Afognak islands. However, ADF&G does not have a stock separation program for pink salmon and is unable to differentiate stocks.

BOF HATCHERY COMMITTEE ISSUES TO CONSIDER STATEWIDE, REGIONAL, LOCAL PERSPECTIVE

Shall be operated without adversely affecting wild stocks of fish...

LAW

1. Is Wild Fish Priority the priority?
2. Is the Sustainable Salmon Policy followed?
3. Have the PNP's proven operations are not adversely affecting wild fish?
4. How to get an Environmental Impact Statement

ESCAPEMENT -SEG -The crown of sustainability

5. How is SEG wild fish assured for wild fish escapement?
6. Hatchery fish straying is damaging the dominant goal of escapement of wild fish
7. How can Mixed Stock Fisheries be separated accurately with straying
8. Department funds syphoned off directed to this impossible separation
9. Any and all Statements made must have defensible scientific objective background
10. Kitoi Bay Hatchery has no otolith thermal marking program ("Dept. does not have a stock separation program for pink salmon and is unable to differentiate stocks")
11. Alaska law and biology clearly differentiates wild stocks from hatchery stocks
12. Marketing lumps wild and hatchery stocks into wild "caught" fisheries,
13. Wild pink or chum salmon SEG also have wild fish priority

FOOD WEB

14. Nearshore wild fish rearing areas impact
15. Near shore rearing habitat carrying capacity
16. Outmigration marine/ estuarine impact
17. Open ocean marine impact and carrying capacity
18. Adult return marine impact on food web
19. Suffocation in fresh water river systems
20. Competition with wild prey invertebrates away from wild fish in narrow band of nearshore waters

REGIONAL PLANNING TEAMS

21. Are RPT's balanced enough for objective comprehensive assessment of fisheries production
22. Is there too much focus on hatcheries without considering other limiting factors to salmon production
23. Are RPT's decisions scientifically defensible?



24. Does ADFG have a strong presence on these Teams or have they become an arm of aquaculture associations with no balance
25. Is the signer of the permits and PAR's different than the actual voting members of the RPT's who deliberate comprehensive salmon planning?
26. Is there anyone overseeing this process?

LOSS OF STATE CONTROL

27. Put in perspective Hatchery x vessel value is 6% of total state x vessel value?
 - How much ADFG operations funding and focus syphoned from wild fish
 - Lack of oversight due to no funding or focus
 - Lack of monitoring
 - Lack of reporting
 - Severe Management uncertainty for 6% x vessel value?
28. Aquaculture Associations and Hatchery section too close to ADFG
 - Aquaculture names on ADFG Reports?
 - Regional Planning Teams lost balance of ADFG's wild fish priority mandate
29. Hatchery Section has grown into P NP's
 - Hatchery section needs assessment
 - Hatchery Section does not differentiate wild fish from hatchery fish
 - Enhancement Reports do not adequately differentiate cost recovery from Common Property fisheries
 - Move from under Commercial Fisheries
 - Does not consider Habitat to assess limiting factors of salmon production from habitat and management first.
 - Assess Hatchery section reports for accuracy, CCPT, and all cost.
 - Line item ADFG hatchery operation cost to state
30. Comprehensive Salmon Plans are not comprehensive for priority of wild fish stocks
 - The word "Comprehensive Plan" changed to "Enhancement Plan" not in statute.
31. 2009 PWS ADFG Review paper

WANTON WASTE QUESTIONS

32. Wanton Waste of unharvested unspawned surplus
33. Suffocation in streams from unharvested surplus
34. Is there adequate money to effectively monitor these magnitudes?
35. PNP enhancement tax used to pay independent monitoring
36. State funding for wild fish priority only

- How is this affecting Gulf of Alaska, Shelikof, Chignik and Alaskan Peninsula, and Cook Inlet portfolio stocks and SEG's?

ROE STRIP QUESTIONS

- Economics for wild fish for food
- 40% of all hatchery fish roe stripped
- How much fish flesh made up of wild pasture food is getting thrown out?
- Impact on Ecosystem and zooplankton lost for waste of 95% of fish flesh
- Is the wasted fish flesh feeding farmed fish competing with Alaskan markets?

DESIGNATED SPECIAL USE AREAS SENSITIVE HABITATS PUT AT RISK

37. Parks, refuges, Critical Habitat Areas, unique habitats low flushing fjords not respected, considered, and abused
38. Special uses being overrun by hatchery interest abusing purpose and intent
39. Dumping of carcasses in Special Purpose Sites polluting them
40. DEC has just passed APDES law that are more lax than others

HATCHERIES AS A BANDAID APPROACH

- What are limiting factors to wild fish production
- Use hatcheries as a last resort
- Habitat ignored to promote hatcheries
- Management replaced with stocking
- Comprehensive Plans must be revised to incorporate these limiting factors

EDUCATION

- BOF brought up to speed on the complexity of hatcheries to interpret science and issues more directly
- Hatcheries 101 for the public who do not understand this dynamic in our fisheries
- Public arena to learn

ECONOMIC ANALYSIS

41. Differentiate economics of 1/3 hatchery pinks compared to 2/3 wild sockeye
42. Hatchery fish are 6% of x vessel value in the state of Alaska?
 - Does 94% of the \$16,000,000 ASMI marketing money aid the 94% wild Alaskan fisherman or does it promote Seattle processors and hatchery fisherman?

- Does any more than 6% of the ADFG operating budget get syphoned off to hatcheries
- Is 94% of ADFG operating budget used for wild fish priority?
- Statewide, Regional and local Economic Statewide perspective
- How much State tax revenue income from lower valued fish?
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PROCESSING CAPACITY

- Is the wild fish quality getting first priority from tenders and processing capacity over hatchery pinks and chums?
- Is wild fish flesh languishing in totes or boats as lower valued hatchery fish are being processed?
- Are wild sockeye fisherman standing down on catch limits because of processing capacity focused on hatchery fish?
- Coordination of Processing/ tender capability/capacity during large hatchery returns when large wild salmon returns...Priority?

MARKETING PARITY

43. Marketing Competition with wild fish fisherman State wide perspective

- Damaged markets from flood of hatchery fish or eggs onto market affecting other areas of the state.
- Damaged prices

44. Marketing Competition with wild fish fisherman Regional perspective

WILD ALASKAN SALMON IMAGE/QUALITY GETTING TARNISHED

- Sodium poly phosphate doused hatchery fillets
- Fish quality issues
- Frozen and thawed multiple times
- Fillets traveling 20,000 miles to China then back to Europe
- Made in China
- Alaska is getting a black eye, Europe getting smart about this

ASMI

45. ASMI \$16 million dollar "other" category from marketing tax

- Is 94% of this marketing money going to promote wild Alaskan Salmon or wild caught salmon
- Does this marketing go to the exclusive niche market of "wild spawning Alaskan" salmon or to glut the market with "wild caught" thawed and frozen
- Is the State making money in these record exports of wild caught fish?

- Marketing tax income from 94% wild fish going where?
- Big processors making up the Board focusing on what for whom?
- % wild fish marketing as compared to hatchery fish
- Too much marketing going overseas to contend with glut of hatchery fish?
- Domestic US processing and markets for exclusive wild salmon market
- Exclusive Market for wild Alaskan salmon separate from hatchery fish market
- Why is ASMI in Seattle?
- Wild Alaska salmon some of the last in the world don't abuse this

ALASKA RESPONSIBLE FISHERIES MANAGEMENT CERTIFICATION (RFM)

46. Where is the straying documented in this certificate?
47. Will straying be in next years certification?
48. How accurate is this assessment? Do hatcheries sully Alaskan management?
49. When will the state own up to the problems we have with hatcheries so our wild fish will indeed be sustainable to have honest marketing
50. Statewide, Regional and local biological Food web perspective for sustainability

GENETICS

51. Genetic Statewide, Regional inter-regional and local Perspective
 - Correct arbitrary definition by quantity of significant stock in Cook Inlet Comprehensive Plan contrary to genetic Policy
 - Delete detrimental definition of "non-significant" stock in Cook Inlet Comprehensive Plan and replace it with "portfolio stocks"
 - Genetic "Significant Stocks" are not to be defined by quantity yet stocks are arbitrarily being sacrificed by Aquaculture whim as "non-significant"
 - Fitness

DEFINE HATCHERY MAGNITUDE

52. ADFG Permitted egg capacity by magnitude
 - all hatcheries are not the same
 - More egg capacity higher the impact
 - Is the hatchery a: Category 1; Category 2; Category 5 egg capacity?

APDES PERMITS DEC

53. APDES Permit DEC statewide general (Concentrated Aquatic Animal Production) Aquatic Animal
54. APDES Permit DEC regional perspective

55. Align DEC APDES Concentrated Aquatic Animal Production (CAAP) permitting for ADFG permitted egg capacity for consistency between all Departments to eliminate confusion
56. Standardize Definitions between State agencies for consistency
57. Lost money of wild fisherman from fish getting smaller losing poundage

DRAWING IN OF PREDATORS FROM BIOMASS RELEASES

58. adding to nearshore predation on wild fish and rearing high valued fisheries
59. Predation on wild stocks from released hatchery fish
60. Predation on wild fish from adult returning hatchery fish
 - Predator birds like glaucous winged gulls enhanced
 - What other predator is enhanced that feeds on wild fish

COMPLIANCE FAILURE OF PERMIT CONDITIONS HAS NO REPRECUSIONS

61. AS 16.10.430. Alteration, Suspension, or Revocation of Permit.
 - If the commissioner finds that the operation of the hatchery is not in the best interests of the public, the commissioner may alter the conditions of the permit to mitigate the adverse effects of the operation, or, if the adverse effects are irreversible and cannot be mitigated sufficiently, initiate a termination of the operation under the permit over a reasonable period of time under the circumstances, not to exceed four years. During the period of time that the operation is being terminated, the permit holder may harvest salmon under the terms of the permit but may not release additional fish.

SUBSTANTIAL PUBLIC BENEFIT

62. AS 16.10.420 (10) Conditions of a Permit = A hatchery be located in an area where a reasonable segregation from natural stocks occurs, This does not say significant stocks, an arbitrary term defined by the CIRPT, it says from "natural stocks". Tutka Head End Creek has natural stocks of Coho, chum, and pink. Fishing occurs right up to the freshwater of these stocks to catch hatchery fish.
63. AS 16.10.400(g) Permits for Salmon Hatcheries during the development of a Comprehensive Plan for a region a permit may not be issued for a hatchery unless the commissioner determines that the action would result in **substantial public benefits** and **would not jeopardize natural stocks**. What does substantial public benefits mean? 20 permit holders or the thousands of visitors recreating in their park? Is 1500 pink salmon a public benefit?
64. Is cost recovery for an aquaculture association a benefit when fisherman consistently do not benefit?
65. AS 16.10.430 Alteration fails to comply and not in their best interest of the public

Open Letter to Alaska Hatcheries

April 16, 2010

A number of Alaska salmon processing companies are interested in exploring the possibility of increased hatchery production of pink salmon in Alaska. We are writing to you, the operators of Alaska's hatcheries, to explain our perspective and goals and to ask for your views, input, and advice.

IMPORTANCE OF PINK SALMON HATCHERIES

From its first incubation of 8 million pink salmon eggs in 1975 to the successful return of more than 64 million pink salmon adults in 2007, the Alaska salmon enhancement program has invigorated fisheries, stimulated investment and enriched the lives of Alaska residents in coastal communities from Ketchikan to Kodiak. Alaska needs the tax revenues, employment, and healthy communities that accompany a healthy salmon industry and strong pink harvests are central to achieving that. Without a large and reliable pink salmon harvest, shoreside processing would not be economically viable in some parts of the state. Southbound shipments of canned and frozen pinks help offset northbound barge costs, reducing shipping costs of northbound goods, and thereby reducing the cost of living for all Alaskans.

VULNERABILITY OF CURRENT BUSINESS

The health of Alaska's pink salmon business has improved in the past decade, but recent changes have highlighted vulnerabilities that threaten to undermine our efforts. First, Alaska harvest trends are not good: the catch has been disappointing over the past two years, and the 2010 pink projections are even worse. Second, Russian harvests are on the upswing and now far outstrip Alaska's: in 2009 Alaska harvested roughly 400 million lbs., while Russia's harvest was over 1.1 billion lbs., driven largely by aggressive hatchery expansion. With Russia's acquisition of MSC [Marine Stewardship Council] certification, even those customers who desire the MSC label will be able to substitute lower-priced Russian production for Alaskan fish, putting Russia in position to replace us in markets we have developed.

HOW SHOULD WE PROCEED?

Alaska needs more pink salmon and the only way to get them is by increasing hatchery production we think that hatchery production of pink salmon can be substantially increased without damaging the ecosystem and to the benefit of all stakeholders. Still, we know that pursuing this goal will involve addressing a number of questions and issues, and we fully recognize the importance of ensuring that hatchery programs and production levels are sustainable and consistent with sound science and protection of wild stocks. As a starting point, we are requesting your input on the following questions. We would welcome responses specific to your region or with a broader, statewide perspective:

1. Are Alaska hatcheries currently producing as much pink salmon as they have been permitted to produce? If not, how much permitted production is not being produced and why?
2. How much expansion could be achieved without new construction? If new construction is needed, would that be better accomplished with expanded capacity at existing hatcheries or by constructing entirely new facilities? If we were to build new hatcheries, where should they be built?

3. What is a reasonable capacity goal? From 2000 – 2008 the average statewide hatchery pink returns were 32.6 million on even years and 55.9 million in odd years – in both cases about 40% of total pink returns. We would like production to increase to 70 million in both even and odd years over the next five years, which would bring hatchery production to roughly 50% of the total. How realistic is that goal?
4. Is it possible to ramp up hatchery production in even-numbered years, to offset the high/low return cycle? Smoothing out the disparity between even and odd year production would also have a highly positive impact for both fishers and processors.
5. Besides the physical plant needs, what are the other steps that need to be taken and factors that need to be considered and addressed in order to move forward with an effort to increase pink salmon production?
6. What roles do you believe the processing community can play in helping to accomplish this goal?

CONCLUSION

The expertise and support of hatchery operators are critical factors in determining if and how those wishing to expand pink salmon production can proceed with advancing that goal. We see a bright future for Alaska pink salmon and hope that together we can craft a plan that can help create sound, long-term production growth that will stimulate Alaska's coastal economy for generations to come.

Industry Working Group



If you have questions or comments please direct them to the group below.

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