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Submitted On  
2/7/2019 2:48:04 PM  
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The hatcherys of pws are critical to the people, families, and the economy of the region. They are overseen by adf&g, a non affiliated government agency of educated marine biologists. These workings are successful and time tested and should not be derailed by political winds, rather they should continue in their current, successful model.



February 20, 2019

**RE: Letter of Support for Salmon Hatcheries for Alaska**

Dear Board of Fish,

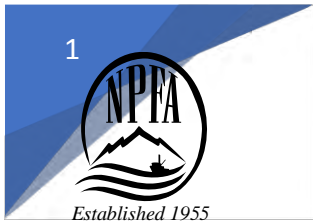
The Native Village of Port Lions, a rural coastal community located on Kodiak Island supports sustainable salmon fisheries and strong hatchery production in Alaska. The Alaska salmon hatchery program provides economic and ecological stability to our salmon returns, which fluctuate year to year. Salmon hatchery production supports our local economies, communities, and all user groups.

The number of people who earn some sort of income from the harvest of hatchery-produced salmon is several times the annual average. Coho, Chinook, and sockeye salmon are the most important hatchery-produced species for sport, personal use, and subsistence harvest. Clearly, resident sport/personal use/subsistence harvest of hatchery salmon have additional economic impacts as well as very significant social and cultural impacts in Alaska.

On behalf of this industry and its stakeholders, we submit this letter of support for Alaska's salmon hatcheries, the Joint-Protocol on Salmon Enhancement, and regular Salmon Hatchery Committee meetings to increase transparency and dialogue at the Board of Fisheries level.

Respectfully,

*Nancy M Nelson*  
Nancy Nelson, President



**North Pacific Fisheries Association, NPFA**

P.O. Box 796 Homer, AK 99669

npfahomer@gmail.com



Chairman Morisky and Members of the Board of Fisheries,

Please accept these comments in **support of Salmon Enhancement & Hatcheries in the State of Alaska**. North Pacific Fisheries Association (NPFA), established in 1955, is currently a Homer, Alaska based group of over 60 commercial fishing families representing a variety of gear types and target species. Whether drift-gillnetting, set-gillnetting, seining or tendering, most of our members are affected by salmon decisions made by the Board of Fisheries and many are directly impacted by the Alaska Hatchery Program which produces nearly a quarter of the value of Alaska's salmon harvest, according to the McDowell Group's October 2018 report. NPFA also holds two board seats for Cook Inlet Aquaculture Association as an Area H fishing organization.

Our members attended the October 2018 BOF Work Session and appreciated the Alaska Department of Fish and Game providing very informative and comprehensive information. In particular from that meeting, [Salmon Hatcheries in Alaska - A Review of the Implementation of Plans, Permits and Policies Designed to Provide Protection for Wild Stocks](#) and RC39, ADF&G Hatchery Reports Alaska's Precautionary Approach demonstrated that ADF&G is taking a science based, conservative approach the hatchery program.

We are comfortable looking to the science and economics of this state program, leaving hatchery-related decisions in the hands of ADF&G as it continues to operate with transparency and regular reporting to the public and Board of Fisheries. We support the proactive approach of managing to separate hatchery and natural runs prioritizing the latter. We know from the Alaska Salmon Hatcheries Overview and first-hand experience that enhancement project permits are awarded only after intense scrutiny by the department including the genetics division.

Straying occurs in natural runs especially in pink salmon and may not be as injurious as has been alleged. Consider the possibility of genetic vigor of sockeye which are known to breed with other sockeye from different year classes, or a degree of straying which is natural amongst pink salmon and what the positive effects may be.

NPFA is a strong supporter of a responsible, sustainable, and transparent hatchery program. Regional Planning Teams (RPTs) are a great way to maintain transparency and increase stakeholder involvement. While the structure is already in place, RPTs have not been utilized as much due to lack of interest from stakeholders. Now that there is an increase in stakeholder interest, we think the RPTs should be utilized locally in all five regions with hatchery operations. The RPTs could report meeting minutes and a summary of actions taken directly to the Board of Fisheries.

NPFA is a strong supporter of the benefits that the Alaska Hatchery Program has provided to our great state and its continued stabilization of salmon runs that many Alaskan commercial and sport fishermen depend on and subsistence and personal use count on to fill freezers for the winter. Hatcheries around the state have undoubtedly added value to all sectors of salmon harvesters. Thank you for your time and consideration.

Respectfully,

Malcolm Milne, President, North Pacific Fisheries Association



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February 18, 2019

Board of Fish Members,

I am writing in support of the Alaska State hatchery program which provides economic stability and opportunity to our coastal communities and residents.

Commercial harvesters, processors, processing workers, support businesses and communities are dependent on the sustainable salmon fisheries and the strong supplemental hatchery production across Alaska.

The Alaska hatchery program not only provides sustainable resource opportunities for the commercial sector, but the charter, sport, personal use and subsistence users also receive great benefits and salmon fishing opportunities.

On Kodiak Island the regional aquaculture association provides a dependable supplement of pink, chum, sockeye and coho production to augment the wild stock salmon returns. The regional aquaculture association also provides chinook, chum, pink, sockeye, coho and rainbow trout opportunities for subsistence, sport and charter users around the island. This hatchery production provides significant benefit to Kodiak island borough, city, villages and residents. With the current economic challenges facing the State of Alaska the stability of the state hatchery program should be strengthened and expanded so continued benefits of the hatchery program can be realized across the state economy and residents.

The State of Alaska made thoughtful prudent investment and developed the state hatchery program and it has been a huge success generating dependable renewable resource that provides jobs and economic activity throughout coastal Alaska. We strongly support the continuation of the Alaska hatchery program and encourage continued efforts to strengthen and expand hatchery opportunities for a stronger Alaska.

Thanks for the opportunity to comment.

Sincerely,

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**Ocean Resources International**  
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**NORTHERN**  **SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

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February 20, 2019

**Board of Fisheries**

March 8, 2019

Statewide Meeting Anchorage, Alaska

**Re: Hatchery Committee Joint Protocol on Salmon Enhancement #2002-FB-215**

Dear Chairman Morisky and Board of Fish Members:

Northern Southeast Regional Aquaculture Association (NSRAA) appreciates this opportunity to comment on the Board's adherence to the 'Joint Protocol' and resurrection of the BOF Hatchery Committee's review of the State of Alaska's salmon enhancement program. The Board has requested information on four topic areas: hatchery stock straying, RPTs, salmon enhancement research, and specific call for enhancement proposals. We will address each of these topic in brief here and more fully at the Hatchery Committee open forum on March 8<sup>th</sup> in Anchorage.

Two of the topic areas the board is requesting regarding current and future straying research will be presented at the Hatchery Wild Investigation on March 7<sup>th</sup> in Anchorage, the day prior to the BOF Hatchery Committee. The science panel members who developed the hypotheses and study design will be in attendance. There is no better venue than this one to learn about Alaska hatchery-wild interactions from the scientists who are conducting, analyzing, and reporting on the findings. The most relevant research on hatchery pink salmon straying in Alaska will be presented, with important opportunities to speak with the researchers and science panel members. If the board wants to imbibe in cutting edge science from real scientists, this is the event for the board.

Many of the topics listed for the Hatchery Committee were discussed, debated, and institutionalized in the late 1970s and early 1980s via the regional comprehensive salmon plans, a requirement under **Article 5 Regional Comprehensive Salmon Planning 5 AAC 40.300 – 5 AAC 40.370**. The comprehensive salmon plans for southeast Alaska took several years to complete with numerous ADF&G and PNP hatchery planners. Phase I plan was published in 1980, followed by the Phase II Plan in 1982. Twenty years later a complete re-write was published as Phase III in 2004.

The **5 AAC 40.300 – 5 AAC 40.370** regulations (circa early-1970s) establish the regional planning team composition, voting, public notice, public involvement, and responsibilities to rehabilitate and supplement natural salmon production. In 1991, the Alaska legislature reviewed the State's salmon enhancement program, and documented that review in a report dated December 1992. Topics proposed for the March 8<sup>th</sup> Hatchery Committee were also evaluated by the Legislature 1991-1992 through hearings, but also a science forum similar to the one occurring on March 7, 2019. In 1991, twenty-five scientific papers were presented on topics of genetics, straying, ocean carrying capacity, mixed-stock management, and case studies from Norway and Sweden, all included in the 1992 *Legislative Review of the Alaska Salmon Enhancement Program*.



The point of this introduction is the State of Alaska established the salmon enhancement program through careful deliberation, statutes, policies, and regulations, all of which included significant scientific analysis and public input. These regulations created a roadmap for ADF&G and BOF oversight and lines of authority that are working well; the BOF Hatchery Committee review and HWI research are necessary components to responsible review.

### **Salmon Straying – research, stray proportion, and mitigation strategies**

There is a multitude of research which should be done in addition to the HWI study. The results of that research which concludes in 2023, should be used to inform the next steps in salmon homing and infidelity to natal stream research. One topic area of great importance is stray rates of wild salmon. It is known wild salmon stray with pink salmon infidelity higher than other species, but most of the research has been conducted in the lower 48. The propensity to stray is likely related to stability of the spawning environment, which is why pink salmon intertidal spawners stray to a greater degree than pink salmon stream spawners from the same watershed.

Is it possible to reduce stray rate of hatchery fish to or less than the wild pink stray rate? Currently, best management practices imprint hatchery fry to their release site by exposing them to both saltwater and a nearby freshwater source. In addition, the fry are held for approximately two months at the location of first saltwater experience. This is believed to help fix or imprint the location in several of the fish's 'memory'. Given that most of the fish (95%+) do return to their first saltwater experience for harvest or broodstock shows that this practice works well. Overcoming the genetic propensity to wander will take additional research and study.

### **Regional Planning Teams – function, public process, improvements**

The regional planning team process and formation is cited in **5 AAC 40.300** and has been functioning well since 1979 through an established set of rules, deadlines, public notification, internal ADF&G review, and deliberations regarding new programs and existing programs. In southeast Alaska where most of the land belongs to the U.S. Forest Service, they hold an ex-officio seat on the RPT and were part of the original comprehensive salmon plan.

A typical hatchery program takes two years to move through the regional planning team and public process before a permit is issued. Once a hatchery permit is issued, changes to the program require a thorough vetting within the departments divisions of genetics, pathology, management, sport fish, fish transport, and local Area Management Biologist before coming before the RPT for deliberation and vote. Some permit alterations (PAR) pass, while many do not.

In the late 1980's the Myer's Chuck hatchery was not performing to standards and the RPT recommended pulling the permit, and the commissioner rescinded the permit and closed the program. In a more recent example in 2017, a PNP group proposed a hatchery in Baranof Warm Springs for the third iteration, but public outcry and NSRAA opposition at the RPT recommended against issuing a hatchery permit. The commissioner agreed and no permit was issued.

Nevertheless, there is always room for improvement. The BOF could be better informed by requiring RPT minutes and RPT generated letters to the commissioner be provided at each finfish region cycle. A presentation should be made by ADF&G staff summarizing key issues and changes in the region. In addition, the chair of each RPT should present key findings on allocation, production, or other pertinent issues, much like the ADF&G Advisory Committees do now.

### **Salmon Enhancement Research – current, needed research, data gaps**

The BOF may benefit from an annual summary from the North Pacific Anadromous Fish Commission. This international group consisting of Canada, U.S., Korea, Russia, and Japan considers and reviews research and management of salmon across their geographic range of the North Pacific Ocean, and provides a more enlightened context for understanding salmon hatchery programs.

<https://npafc.org/newsletter/>

The most important research regarding pink and chum salmon straying and reproductive fitness is being conducted now in Prince William Sound and southeast Alaska. This research is robust, uses cutting edge genetic parental-sibling pedigree analysis, and will help inform whether there are effects from hatchery straying. This study should be allowed to finish its course through 2023, two full life cycles of pink and chum salmon before embarking on additional research. Once results are available, they should be used to inform the next generation of research on hatchery and wild interactions.

One avenue of research to be pursued at this time is natural stray rates of wild pink salmon and chum salmon. Natural stray rates are believed to be high in pink salmon (up to 10%, Quinn, T.) and lesser in chum but still high compared to sockeye and coho. In order to put hatchery straying into context it is necessary to understand wild adult salmon straying, both proportional and distance from natal stream.

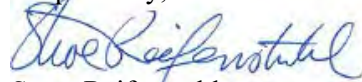
### **Board Cycles and Call for Proposals – how is it working, improvements**

The BOF hears various hatchery proposals every three years at the region's finfish cycle. Most of these proposals have to do with allocation, terminal harvest area adoption, terminal harvest area rotational schedules, and hatchery production. In the past year the BOF has heard many more ACRs and emergency petitions regarding hatcheries out of cycle, which seems inefficient and subverting the public process.

There is good reason for the BOF to receive a statewide perspective once per year at the Work Session or Statewide meeting, but deal with local regional issues at the normal three year cycle for finfish in the region.

Thank you for this opportunity to comment. I look forward to the discussion at the hatchery forum. Please consider attending the HWI science meeting at the Sheraton on May 7<sup>th</sup>.

Respectfully,



Steve Reifenstuhl

General Manager, Northern Southeast Regional Aquaculture Assoc.

Submitted By  
nyle Thomas  
Submitted On  
2/20/2019 10:08:45 PM  
Affiliation

I am 35 years old and have salmon seined since 1997. I started out as a deckhand and now I am a skipper and boat owner since 2011. I have witnessed in my time as fishing the economical benefits of what hatcheries have done for sport and commercial fishermen. The strenuous avenues that hatcheries go through to meet ADFG requirmentst is proof that hatcheries are well managed. Since the start of the hatchery programs in the 1970 and 80's hatcheries had to follow with a comprehensive salmon plan.





February 20, 2019

Alaska Board of Fisheries  
Reed Morisky, Chair  
Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: On-time comments for March 8 Hatchery Committee**

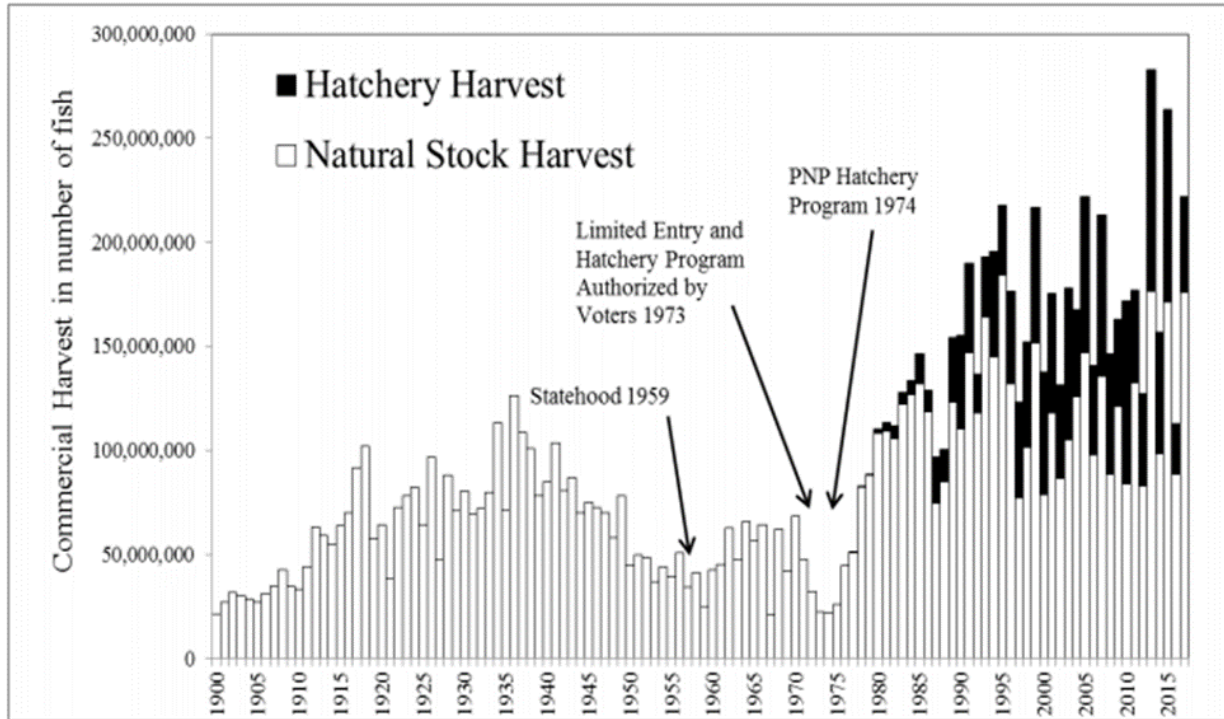
Chairman Morisky and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (board) Hatchery Committee scheduled for March 8.

PSPA is a nonprofit seafood trade association representing nine seafood processing businesses and their investment in coastal Alaska, including three shorebased processors located in Prince William Sound (Cordova and Valdez), four in southeast Alaska (Wrangell, Sitka, Ketchikan), and two in Kodiak. Alaska's unique salmon enhancement program is critical to the stability of the fishery-dependent communities in these regions, as well as the livelihoods of thousands of Alaskans. **Alaska's salmon hatcheries contribute nearly a quarter of the value of our state's salmon harvests and generate \$600 million in economic output, with impacts throughout the economy.**

Given the interest in and dependence on the hatchery program and the overwhelming public support for the program conveyed at your October 2018 work session, we appreciate the board convening the hatchery committee to further review components that could not be comprehensively reviewed in October. We continue to support the intent of the Joint Protocol on Salmon Enhancement to highlight statewide perspectives on issues associated with hatchery production of salmon and to provide a forum to improve dialogue and transparency between the Board of Fisheries, ADF&G, fisheries stakeholders, and the public. **We also support completion of the Alaska Hatchery Research Project, as directed by the science panel, to inform the board and the public of wild-hatchery interactions and impacts.**

Hatchery pink and chum salmon are crucial for Prince William Sound and Southeast processors because they represent the volume necessary to keep plants operating, in addition to wild stock salmon and other species such as halibut, black cod, and Pacific cod. Only in this way can they remain viable and provide markets not just for salmon fishermen, but for all other commercial fishermen. Processors and harvesters have made significant long-term investments in processing plants and their fishing businesses, respectively, based on this program and permitting decisions. In addition, tenders, support vessels, support businesses, transportation companies, sportfish businesses, and community governments (through fish taxes) are just as dependent on the direct and indirect economic activity that the hatchery programs provide.



Source: ADFG.

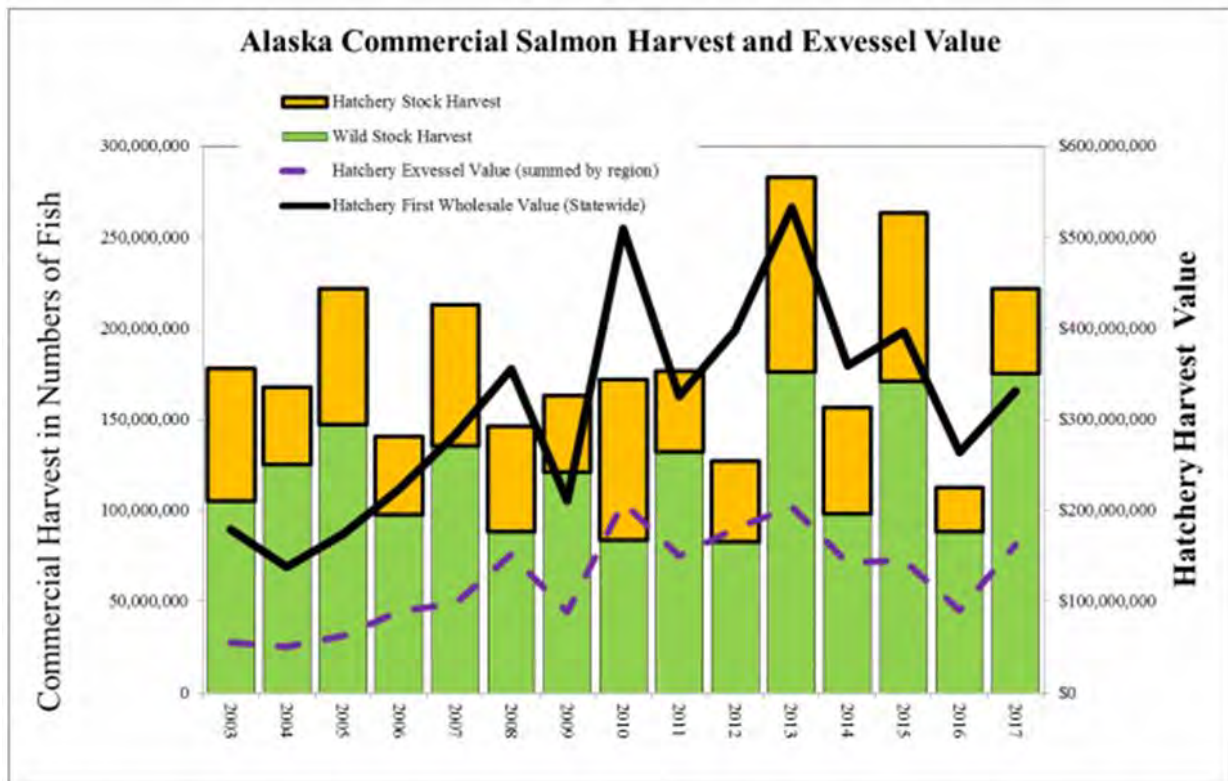


Figure 4.—Hatchery and wild stock harvest in numbers of fish and the estimated exvessel and first wholesale value of the hatchery fish harvest, 2003–2017.



The State of Alaska established the hatchery program in 1971—at a time when Alaska’s salmon returns were at historic lows—to provide for more stable salmon harvests and bolster the economies of coastal communities that would not otherwise have viable economies. Alaska lawmakers authorized private nonprofit corporations (PNP) to operate salmon hatcheries, an exemplary example of state and private partnerships. The state invested significant resources into carefully and deliberately building this program in response to severely depressed commercial fisheries, and it was designed to supplement natural production, not replace it, and to minimize interactions with naturally occurring populations of salmon. Salmon produced by the program originated from local salmon stocks. Many of these programs are now integral to the Pacific Salmon Treaty which directly affects sport and commercial salmon fisheries of Alaska. A testament to the program is that commercial pink and chum salmon fisheries improved greatly in response, both wild and hatchery-origin production, which follow similar annual trends (see figures above). The remainder of our comments focus on the committee agenda topics.

### *Hatchery stock straying*

Much of the committee’s agenda is focused on hatchery stock straying, and public views on acceptable levels of straying. A fundamental part of the Alaska hatchery program is that policies and regulations were adopted to mitigate concerns associated with straying of hatchery fish, and significant, multi-year, inter-agency research (the Alaska Hatchery Research Project) has been underway to determine the degree to which hatchery pink and chum salmon straying is occurring, including the range of interannual variability in the straying rates, and an examination of the genetic structure of pink and chum salmon in Prince William Sound and Southeast Alaska and the impact on productivity of these salmon.<sup>1</sup> This research, conducted by the Prince William Sound Science Center and Sitka Sound Science Center, is a direct response to the value that hatchery production provides to Alaska and the mandate that hatchery production be compatible with sustainable productivity of wild stocks, and thus was instigated and supported by ADF&G, the university, the fishing industry, and hatchery operators. The research plan and objectives were developed and monitored by a science panel with broad experience in salmon management and wild and hatchery interactions, comprised of current and retired scientists from ADF&G, the University of Alaska, aquaculture associations, and National Marine Fisheries Service.

Straying is common in both wild and hatchery salmon and is not considered ‘bad’ or ‘good’ by geneticists or managers. Acceptable levels of straying should not be determined by general public opinion, but be guided by genetic propensity to stray, recognition that the stock, species, and environmental conditions influence stray rates, and credible research on the impact of straying on the productivity of wild stocks. The state has invested in sound, long-term scientific research through the Alaska Hatchery Research Project, and this should be relied on in assessing stray fractions in wild streams and whether there is a deleterious effect. The department and the science panel for the Alaska Hatchery Research Program are likely the best suited to provide recommendations on additional study subjects and provide a continuous evaluation of best practices, as was done in October 2018 (*Special Publication No. 18-12, Salmon Hatcheries in Alaska – A Review of the Implementation of Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks, ADFG October 2018*).

### *Regional Planning Teams*

The Board is also soliciting input on the regional planning team process and potential improvements to both the public input and regulatory processes. We are pleased to see a specific focus in both the staff

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<sup>1</sup> [http://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesResearch.current\\_research](http://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesResearch.current_research)

reports and the open forum on how the regional planning teams operate and their responsibilities, as there appeared to be some misperceptions at the October meeting. Relatedly, the comprehensive salmon plans, which are required by law and document enhancement efforts, set production goals, and identify potential for new projects, are key to this discussion.

Our experience with the regional planning team process is that public participation has varied over time, but the structure for public notice, input, action, and a record of the meeting is in place and adhered to. There are many examples of proposals that have garnered the public's interest and have resulted in significant participation (both support and opposition) that affected the Commissioner's permitting decision (examples include Baranof Warm Spring Hatchery in 2012, 2015, and 2017). Given this record, it appears public notice is sufficient and input is taken seriously by the department. However, the Board could always review and enhance public notice requirements if they see opportunity for improvement. In addition, the Board could consider requiring that all regional planning team minutes are provided to the Board during each regional cycle, to ensure they maintain an understanding of proposals, testimony, and permitting decisions.

#### *Enhancement related research*

As stated previously, the ongoing Alaska Hatchery Research Project is a long-term project designed by state, federal, and other scientists to provide robust scientific information on the interaction of wild and hatchery pink and chum salmon in Prince William Sound and Southeast Alaska, the issue the Board appears most interested in. Components of this study are completed and published annually on the ADFG website, and recent results have been presented at the Alaska Marine Science Symposium in January. This project is an example of the type of fitness study needed to understand impacts, by examining the difference in reproductive success of hatchery strays and wild pink salmon in a particular area of Prince William Sound. These results are from a small portion of the pink salmon fitness data in Prince William Sound thus far, and evidence of the ability to conduct such analyses in natural systems. We strongly recommend that the current hatchery-wild interaction study be completed, and that these results inform the next phase of related research.

#### *Economic Benefits*

While not part of the formal agenda, the benefits of the state's salmon enhancement program provide needed context for this meeting and reach well beyond commercial fishery and community impacts. All of the PNPs have programs that benefit sport/charter, personal use, and subsistence fisheries, particularly their Chinook, coho, and sockeye salmon programs. Sport fish directed programs are conducted by PNPs from Ketchikan to Kodiak, and on average, about 272,000 Alaska hatchery salmon were harvested annually in the sport and related fisheries during 2012 – 2017 (McDowell, 2018).

The 2017 Alaska Salmon Fisheries Enhancement Annual Report<sup>2</sup> produced by ADFG indicates that in 2017, hatchery fish contributed 21% of the statewide commercial salmon harvest. This is a significant contribution to Alaska's salmon fisheries, even while it is the lowest percentage of hatchery fish in the harvest since 1995. This low percentage was due largely to a very high wild stock harvest that was the 3rd highest in Alaska history (the report notes that 2013, 2015, and 2017 were three of the four highest

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<sup>2</sup> [http://www.adfg.alaska.gov/fedaidpdfs/rir.5j.2018.02.pdf?\\_ga=2.16801777.93909972.1530292352-686289217.1523643770](http://www.adfg.alaska.gov/fedaidpdfs/rir.5j.2018.02.pdf?_ga=2.16801777.93909972.1530292352-686289217.1523643770)

wild stock returns in Alaska's history dating back to the late 1800s). Recent economic studies<sup>3</sup> have shown that during 2012 - 2017:


- Commercial fishermen harvested an *annual* average of 222 million pounds of hatchery origin salmon worth \$120 million in ex-vessel value.
- Hatchery derived first wholesale value represents 24% of total statewide salmon first wholesale value.
- About 10,000 Alaska hatchery origin Chinook, 5,000 chum, 100,000 coho, 19,000 pink, and 138,000 sockeye salmon are harvested annually in sport and related fisheries.
- Alaska's salmon hatcheries account for the *annual equivalent* of 4,700 jobs<sup>4</sup>, \$218 million in labor income, and \$600 million in annual economic output.
- More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska's salmon hatchery production.
- Southeast Alaska hatcheries account for 2,000 annualized jobs, \$90 million in labor income, and \$237 million in total annual economic output.
- Prince William Sound hatcheries account for 2,200 annualized jobs, \$100 million in labor income, and \$315 million in total annual economic output.

#### *Process*

The Board has reviewed hatchery proposals in both July and October 2018 and will again receive a review and discussion of ADFG's hatchery program at this March 8 committee meeting. PSPA is committed to sound science through the use of best available data and the expertise of our fishery scientists and managers, and values a strong public process. We hope the Board feels up to speed on the hatchery program and research as a result of these meetings and will move to a more reasonable, annual schedule to receive an overview of hatchery issues, such as the annual October work session. In addition, hatchery-related proposals could be included in the regular 3-year finfish cycle for each region. Providing a plan for future review, and approaching hatchery issues in a less ad hoc manner, is important to retain the public trust.

Thank you for considering our comments.

Sincerely,



Nicole Kimball  
PSPA - Anchorage

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<sup>3</sup> Economic Impacts of Alaska's Salmon Hatcheries, McDowell Group, 2018.

<sup>4</sup>The employment impact of 4,700 jobs is an annualized estimate; the number of people who earn some income from the harvest of hatchery salmon is 16,000, several times the annual average.

Submitted By  
Patrick Tyner  
Submitted On  
2/20/2019 12:09:52 PM  
Affiliation  
Troller/SSRAA board member

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Once again it seems that fishermen have to defend a hatchery enhancement system that continues to perform with great success. I cannot even begin to tell you how important our coho hatchery here on Prince of Wales has become in the face of the continuing decline of access to king salmon stocks. Without the hatchery system in place In Southeast, the entire region would be a sad place to troll and try to eke out a living from salmon fishing. Please consider the science that goes into the continued existence of our hatcheries versus the pseudo science and emotion that comes from hatchery detractors that would tear a functioning program apart. We pay for these hatcheries and the science that supports their continuing existence. Can the same be said for our detractors? Do they pay for their pseudo science or does some wealthy benefactor provide the financial means? I know that I'm using the same emotion to try to maintain the status quo. But on the other hand I don't have the science at my fingertips nor the intelligence to articulate what I read. It's out there, that's all I can say. Patrick Tyner

Submitted By  
Paul Owecke  
Submitted On  
2/19/2019 8:34:10 AM  
Affiliation  
None

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Email  
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Thank-you Board members for your consideration,

My name is Paul Owecke. I was employed by ADFG (FRED division) as a fish culturist from 1978-1983, and have been an active set gillnet permit holder in the PWS salmon fishery since 1983. I appreciate the BOF making the effort to address Hatchery issues.

I believe that the Joint Protocol on Salmon Enhancement in its current form is appropriate for guidance in the BOF interactions with the public. I do not believe that taking regulatory action in the setting outlined in the Joint Protocol is appropriate as the BOF has the ability to accept proposals regarding aquaculture within other existing Board Protocol. I believe there is no merit in the BOF including the Board's hatchery authorities in calls for proposals as there is no better scenario for the transparent consideration and implementation of hatchery regulation than existing BOF authority.

In making informed decisions regarding hatchery straying I would recommend any citizen and all Board members read in its entirety ADFG Special Publication No. 18-12 Salmon Hatcheries in Alaska- A Review of the Implementation of Plans, Permits and Policies Designed to Provide Protection for Wild Stocks. In particular I hope that special attention is paid to Page 52 last sentence that states, " The 2% criterion is not biologically appropriate for PWS pink salmon and this threshold criterion should be reconsidered when the Prince William Sound/Copper River Comprehensive Salmon Plan is updated." Biological justification for this statement is clear in reading the entire PWS Pink Salmon Recommendations section.

Currently there is an unsubstantiated reliance of 2% being the tolerable limit of hatchery straying before adverse effects compromise the "fitness" of wild stocks. Along with the mistaken notion that a 2% rate of hatchery stray has adverse effects is the compounding confusion of no consistent definition of "fitness" in wild stocks. No informed decision on acceptable levels of straying can be determined until there is science based information on what stray rates do mean in terms of affecting long term viability of wild stocks. Fortunately there is an ongoing study to determine what stray rates do in real terms of affecting wild stock viability. As referenced in Special Publication 18-12 the ongoing study (Alaska Hatchery Research Project) will be critical in making informed decisions regarding the allowable level of hatchery straying while protecting the long term viability of wild stocks. I encourage the BOF defer from implementing any short or long term mitigation strategies until this research project is complete.

I would encourage the BOF implement a public information program to inform the public of their already existing ability to participate in the RPT process in order to facilitate greater public input in regard to hatchery issues.

Respectfully yours,

Paul Owecke



February 19, 2019

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206.728.6000  
OPERATION FAX 206.441.9090  
SALES FAX 206.728.1855

Alaska Board of Fisheries  
Reed Morisky, Chair  
Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Hatchery Committee Meeting

Dear Chairmen Morisky and Board Members:

Thank you for the opportunity to comment on Salmon Hatcheries Committee Meeting and Joint Protocol on Salmon Enhancement put forth the Alaska Board of Fisheries on March 8th. **Peter Pan Seafoods, Inc supports a transparent and comprehensive mechanism for sustainable salmon fisheries and strong hatchery production in Alaska.**

Peter Pan Seafoods is a long-standing processor of Alaska's seafood. We have processing facilities in King Cove, Port Moller, Dillingham and Valdez as well as fisherman support facilities at Sand Point, False Pass and Naknek. We have been processing in Prince William Sound since 1988. Our operations are intricately tied to and supported by the communities in which we reside. The health of these communities and our industry is dependent on sound management that protects the health of Alaska's fishery resource.

Hatcheries in Alaska continue to have remarkable economic impacts directly effecting the harvesting and processing sectors, as well as, local communities. In Valdez alone, over 900 captains and crew support the local the grocery stores, hardware stores, and restaurants in the community. This activity is synonymous for all communities with a total of \$600 million in annual economic output that benefit from hatchery production throughout Alaska.<sup>1</sup>

The Alaska Hatchery Research Project, funded in partnership with the state, hatchery organizations, and the processing industry, is a groundbreaking study to provide conclusion to many unanswered questions regarding salmon in Alaska. Specifically, the interaction between wild and hatchery raised pink and chum salmon. The three major questions to be answered are the current status and effects of the genetic stock structure, straying of hatchery bred salmon, and overall impact on fitness of wild pink and chum salmon. As data becomes available, thoroughly analyze and discuss the results to understand the impacts to mitigate any future risks through sound science and judgement.

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<sup>1</sup> Economic Impacts of Alaska's Salmon Hatcheries, McDowell Group, 2018.





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Through sound science and judgment, private non-profit hatchery permit alterations regarding hatcheries in Alaska follow a vetted and transparent public process. Each request is rigorously reviewed by a panel of industry members from ADF&G, hatchery organizations, and private industry members to provide a recommendation whether to approve or deny the alteration. Each industry member thoroughly reviews the potential impacts the permit alteration could have on the fishery locally, as well as the surrounding fisheries.

Peter Pan Seafoods, Inc thanks you for providing a platform for discussion and encourages you to continue to support the Salmon Hatchery Committee Meeting.

Sincerely,

Mike Simpson  
VP. Of Alaska Operations

PVOA BOF Hatchery Committee Comments  
PO Box 232 Petersburg, AK 99833

Petersburg Vessel Owner's Association  
(907) 772-9323  
email: [pvoa@gci.net](mailto:pvoa@gci.net)

February 20, 2019

Alaska Department of Fish and Game  
Board of Fisheries  
PO Box 115526  
Juneau, AK 99811  
Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: March 8<sup>th</sup> Hatchery Committee Meeting Comments

Dear Chairman Morisky and Board of Fisheries Members,

PVOA's mission statement is to:

“Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat.”

Thank you for the opportunity to comment on the Alaska Hatchery program, Regional Planning Team process, and the Joint Protocol on Salmon Enhancement.

As reflected in our mission statement above, PVOA supports sustainable wild salmon fisheries and salmon enhancement to provide economic stability within year to year wild salmon fluctuations.

PVOA supports and participates in the Regional Planning Team process in Southeast Alaska on an annual basis. The RPT process is led by regional aquaculture associates and ADF&G staff facilitating a public process for consideration of hatchery production levels and release sites. Additionally, there is permitting oversight by the Department of Natural Resources and the Department of Environmental Conservation.

PVOA supports the intent of the Joint Protocol on Salmon Enhancement signed by the Chair of the Board of Fisheries and the Commissioner of ADF&G in 2002. The basis of the Joint Protocol is to facilitate a non-regulatory public forum for a statewide review of hatchery production of salmon. These meetings were intended to be held on a regular basis to update the public on management, production, and research, but have fallen to the way side in recent years. We thank you for your effort to resurrect this process and hope this Joint Protocol is upheld in the future.

As you are well aware, there is an on-going Alaska Salmon Hatchery Research Project being conducted by the State of Alaska and Private Non-Profit Hatcheries focused on providing information on the interaction of wild and hatchery pink and chum salmon in Prince William Sound and Southeast Alaska. The research is meant to address three major questions:

1. What is the genetic stock structure of pink and chum salmon in each region?

PVOA BOF Hatchery Committee Comments  
PO Box 232 Petersburg, AK 99833

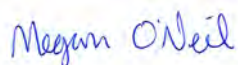
Petersburg Vessel Owner's Association  
(907) 772-9323  
email: pvoa@gci.net

2. What is the extent and annual variability in straying of hatchery pink salmon in Prince William Sound and chum salmon in Prince William Sound and Southeast Alaska?
3. What is the impact on fitness (productivity) of wild pink and chum salmon stocks due to straying of hatchery pink and chum salmon?

PVOA members are supportive of the collective efforts to answer these three questions for Southeast Alaska. Necessary data to evaluate and seek answers is just beginning to be collected. Thanks to the Sitka Science Center, we have two years of genetic stock structure information on four chum salmon streams. Our membership is interested to learn the answers to these questions via the public Joint Protocol process in the future.

In closing, we appreciate the Board of Fisheries hosting the March 8<sup>th</sup> Hatchery Committee Meeting and value the opportunity it creates for the public to receive scientific updates and participate via public comment on salmon hatchery production in Alaska.

Respectfully,



Megan O'Neil  
Executive Director

Submitted By

Forest Jenkins

Submitted On

2/18/2019 11:28:54 AM

Affiliation

Prince William Sound Setnetter's Association President

At this point, it is evident that further research needs to be done to learn the impacts of hatchery strays on wild stocks before we change policy. We need to establish a better definition of fitness to have a greater understanding of the effects of hatchery fish on the long term viability of the wild stocks. We also may need to adjust the allowable upper level of hatchery strays in wild spawning grounds if in fact there is scientific evidence suggesting flexibility in this range that is not jeopardizing the viability of these wild stocks. Making extreme adjustments in hatchery production and management strategies without substantial scientific evidence and understanding poses way too much risk to the salmon stocks across the state and to the many people's livelihoods that are directly dependent on this resource.

Before any changes are made, it is essential that we have the necessary resources to gather the scientific data that provides us direction for a long term plan to maximize the overall long term viability of salmon stocks in Alaska.

Thank you for the opportunity to comment.



Prince William Sound  
Aquaculture Corporation  
DEVELOPING SUSTAINABLE SALMON FISHERIES  
FOR ALASKA AND THE WORLD

February 19<sup>th</sup>, 2019

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Hatchery Committee Meeting – March 8<sup>th</sup>, 2019

Chairman Morisky, Members of the Alaska Board of Fisheries:

The Prince William Sound Aquaculture Corporation, (PWSAC) offers these comments and suggestions as they pertain to the agenda for the ADFG Board of Fisheries (BOF) Hatchery Committee Meeting.

First, we would like to thank the BOF for its desire to institute the Joint Protocol on Salmon Enhancement #2002-FB-215. This important forum provides an opportunity to inform and update the board and public about Alaska hatchery program. Since this protocol was suspended for many years by the board, critical information was not conveyed to the public, who seek to understand hatchery/wild salmon interactions and the regulatory structure governing Alaska's salmon enhancement programs. PWSAC fully supports restarting this vital informational process.

With respect to the Hatchery Committee meeting, PWSAC offers these comments and suggestions for the topics of discussion set by the board:

### **Hatchery Stock Straying**

As our ability to study hatchery stock straying improves through mark and capture programs, we are learning more about the extent of this naturally occurring phenomenon. Pink salmon, have a strong genetic propensity to stray which is not unique to hatchery stocks. This fact was recognized when hatchery permitting, and management plans were first developed, and it should be noted that holding hatchery salmon to a different standard is unreasonable. It is important to recognize that Pink salmon are a pioneering species.

While there is much we do not understand about straying of hatchery salmon or its impacts, significant research is being conducted to address these concerns. However, we are only now beginning to receive the necessary data to answer these questions and a complete understanding of hatchery/wild interaction is years from completion.

*Recommendations on additional study subjects:*

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As we gather more comprehensive information from the Alaska Hatchery Research Project (AHRP) additional study topics will become evident. Hatchery marking programs provide an efficient method of determining the presence of hatchery fish in spawning systems. Unfortunately, the same cannot be said for natural stocks. Achieving a better understanding of this natural phenomenon will be necessary before scientific guidelines for acceptable stray rates for a given species can be created. To further this study, we must develop comparative analysis of natural stray rates for different spawning systems and habitat and geographical areas. The study of those spawning systems which contain consistently high rates of hatchery strays require additional consideration. What causes this and how can it be mitigated through the application of fisheries management?

*Views on acceptable levels of straying:*

Science, not public opinion must lead policy development on this topic. In determining an acceptable level of straying of hatchery stocks, the following guiding principles should be considered;

- Rates of straying must be considered for each individual species, based on the species genetics, environmental conditions, spawning habitat and geographical population structure.
- The overall fraction of hatchery strays, not merely presence, is an important determining factor. The AHRP uses this robust analysis method for assessing the actual fraction of hatchery strays in a known region or management district rather than a simple percentage of origin in a given stream.
- The presence of hatchery strays does not necessarily equate to harm. The conclusions of the AHRP, the most rigorous study to date on the effect of hatchery straying on the fitness of natural stocks, is not yet complete. A determination of an acceptable level of hatchery straying cannot begin to be fully considered until the effect of hatchery strays on natural salmon populations is known.
- Finally, the long-term effect of hatchery/wild interaction on escapement and abundance of natural stocks for areas with high hatchery production must also be considered. Prince William Sound has not only experienced high hatchery productivity, but also record natural pink salmon returns in recent years.

*Recommendations on mitigation strategies:*

Fisheries management plays a role in hatchery salmon straying, and strategies should be evaluated and considered going forward. The continued implementation of aggressive fisheries management to harvest hatchery salmon stocks in areas where high fractions of hatchery strays are known is important. This will reduce the presence of hatchery stocks before they are given opportunity to stray. In addition, the department and the enhancement community should work together to develop and implement best management practices to reduce straying beginning at release sites, and ending with the harvest of surplus adult fish in hatchery harvest areas. The otolith marking of hatchery fish, and timely evaluation of the hatchery contribution in a fishery is important to in-season management.

**Regional Planning Teams (RPTs)**

The RPT process as structured works and is doing what it was designed to do. Hatchery production requests are given scrutiny and denied more frequently than approved. Meetings are open and public, follow an established agenda and regulatory process, and are noticed 30 days in advance. As may be the case here, when the public does not agree with the outcomes of a process, the institution is immediately considered broken and non-transparent. We would argue that this is not the case, however there is room for structural improvement. It should be noted, that RPT's are only recommending bodies, all recommendations made by the RPT are

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forwarded to the Commissioner of Fish and Game who is the only one that has approval authority. Given these considerations, PWSAC offers the following suggestions to improve public process:

*Potential improvements to the RPT public input process*

One significantly lacking component of the public process is public participation. Regional associations could enhance meeting structure to encourage comment opportunity prior to and during the meeting. Technological advances to encourage telephonic participation at reduced cost are also valuable tools to improve information flow. The dissemination of RPT actions would greatly improve public awareness with meeting minutes made available on the ADFG website.

**Enhancement Related Research**

Ocean carrying capacity and the consideration of global salmon abundance could be further developed for public understanding. The study of the greater North Pacific basin is not within the purview of ADF&G, but has been significantly researched on an international level by the North Pacific Anadromous Fish Commission. A sharing of this ongoing body of research, facilitated by the BOF and the NPAFC at future forums would improve the public's understanding of this vast issue.


**Merits of including the Board's hatchery authorities as part of the Boards call for proposals**

The public has opportunity to provide proposals for consideration by the BOF for true allocative matters within the standard three-year cycle. We believe strongly, that if the BOF commits to convening an annual hatchery forum, and the department continues to review RPT decisions and provide updates on hatchery operations, all involved will gain a better understanding and be provided opportunity to voice concerns. For many decades, the authority over hatchery permitting and production has resided with the commissioner. This has largely allowed the board to focus on allocative matters of hatchery stocks and provides production stability to the users of the resource and the enhancement community. It has been a very effective method of managing hatchery programs, using a sound application of scientific and precautionary principle. PWSAC would hope that this remains the case, if production proposals were to come to the BOF during meetings it would create uncertainty for operators and bog down the board process with wild proposals increasing or decreasing activity based on personal opinions or political whims.

PWSAC has been responsibly producing pink, chum, coho, sockeye and king salmon for harvest in PWS fisheries for nearly forty years. Our enhancement programs contribute on average \$192 million in economic output to Alaska's economy, while providing additional opportunities for sport fishing, personal use and subsistence.

Thank you for the opportunity to advance suggestions for the agenda topics scheduled for the hatchery committee meeting. We look forward to working with the Board of Fisheries and ADFG to improve public understanding of these important fishery enhancement programs.

Sincerely



Casey Campbell  
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES  
FOR ALASKA AND THE WORLD**

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[www.pwsac.com](http://www.pwsac.com)

Submitted By  
Randall A Smith  
Submitted On  
2/8/2019 2:53:57 PM  
Affiliation  
user group

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9074607045

Email  
[racsmith2157@gmail.com](mailto:racsmith2157@gmail.com)

Address  
3999 Lakewood Loop  
3999 Lakewood Loop  
North Pole, Alaska 99705

I've been hunting the back part of Fish Lake (between Summit Lake and Paxton Lodge) for 30 years. The creek running out of Fish Lake used to be full of Sockeye Salmon. The trail would be littered with partially eaten fish from Grizzly Bears. Glassing for game from the hill tops overlooking the lake you could see hundreds to thousands of Reds crusing the banks of the lake. Once they put the hatchery on the Galkana River just before Summit Lake the numbers have dwindled over the years to the point that now I never see a single salmon in the creek or the lake! Years ago F&G made improvements to the trail so that ATV's now only cross the creek one time instead of several times as in the past.

What are your thoughts as to why this wild natrual run is now extinct? Did F&G put the gate across the creek entrance for that purpous? I fear one day a tractor trailer hauling double tankers of fuel may go off the road into Summit Lake effecting the natural runs coming up the Galkana to Paxton Lake, Summit Lake etc. Just curious and would like your thoughts!



Submitted By  
Ray Sutton  
Submitted On  
2/20/2019 10:00:20 PM  
Affiliation  
Commercial Fisherman

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9072554986

Email  
[raysutt@gmail.com](mailto:raysutt@gmail.com)

Address  
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PO Box 2469, 1633 Kotsina Ct  
Valdez, Alaska 99686

To Whom it May Concern,

As a fifth generation Alaskan and a third generation PWS salmon seiner, I find the thought of reduction of salmon hatchery production completely appalling. Certain organizations are lobbying to curtail our hatcheries for reasons without merit, let alone science. We have world class hatchery programs in this state that not only help sustain the natural resources Alaska has to offer, but also provide much appreciated revenues to rural Alaskan communities via the numerous fishing opportunities this offers. Yes, I am a commercial fisherman. I employ a small crew each year and sell my catch to a processor staffed with numerous employees. However, my friends and neighbors own charter fishing businesses as well. Let's not forget the swell of tourists that flock to our small towns in the summer, filling our hotels and restaurants, in hope of reeling in a derby winner. There are more than just fishing businesses at stake. We have a statewide tourism industry that has been an obvious winner with our well designed hatchery programs. My little coastal town would suffer in numerous ways without the production of Valdez Fisheries Development Association.

Submitted By  
Richard Eliason  
Submitted On  
2/20/2019 2:00:44 PM  
Affiliation  
Commercial fishermen

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Email  
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Address  
8475 E Gold Bullion Blvd  
Palmer, Alaska 99645

I am a third generation fishermen from Alaska and have been fishing my own salmon fishing business since 1988, and I started fishing in 1967. Hatchery production has been very important to my family over the years with my hatchery salmon catch being close to 90% of my gross income. This has become a trend in the SE Ak gillnet fishery over the last 10-15 years and it is my only means of income in the last 5 years.

Respectfully Yours,

Richard I Eliason

Palmer Alaska

Submitted By  
Richard J Tarabochia  
Submitted On  
2/20/2019 3:58:12 PM  
Affiliation  
Seine Vessel Owner

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206 351 6161

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Address  
833 S Marine Hills Way  
Federal Way, Washington 98003

As a lifelong commercial salmon purse seine fisherman, we rely on salmon hatchery enhancement to supplement weak wild stocks in our Prince William Sound salmon purse seine fishery. We have a five man crew that also relies on a viable salmon fishery to support their families.

Submitted By  
Robert Eckley  
Submitted On  
2/20/2019 8:39:35 PM  
Affiliation  
commercial fisherman

Chairman Morisky and members of the BOF

I am a strong supporter of producing food for fish lovers in Alaska and all around the world. I have been very amazed at the seafood industry in Alaska and how it employs more people than most other industries in the state. This industry has fed my family and as my sons take over for me and my wife we are concerned that the enhancement program's destiny is being decided by public comment and not science. The complicated issues presented to ADF&G are complex and the studies being done are helping unravel some of the mysteries one at a time. So for us in a successful industry that produces fantastic seafood products and employs so many, do we get to continue or not? I hope for my son's sake, we can continue to enhance our salmon and keep studying the questions that we don't understand. Please consider how much the hatchery system adds to the economy of the state and how many happy customers we have locally and around the world.

Submitted By  
Robert Martin  
Submitted On  
2/20/2019 11:57:55 AM  
Affiliation

Dear BoF,

Please continue to make good science based decisions regarding our Alaska salmon hatcheries. These wild fish come back into our commercial fisheries and make a huge contribution to the economies of southeast Alaska. I anticipate that there will be a lot of emotionally driven proposals and testimony to reduce hatchery releases. Let's stick to the science and facts. Be skeptical of outside hired scientists that are pushing an anti-hatchery agenda. Listen to your ADFG. Thank You!

Submitted By  
Robert K McDonnell  
Submitted On  
2/20/2019 12:29:40 PM  
Affiliation

Phone  
360 220 6339

Email  
[roddymcdonnell@yahoo.com](mailto:roddymcdonnell@yahoo.com)

Address  
230 shallow shore rd  
bellingham, Washington 98229

My name is Robert McDonnell. I am 64 years old and have been an Alaska permit holder since 1976. I now hold and fish a PWS seine permit. Salmon hatcheries in Alaska have been a very large part of the catch I have generated for many years. I support them. Please make sure that any decisions that are made concerning hatcheries are supported by science and not politics. Thank you.

Submitted By  
Robert Watson  
Submitted On  
2/20/2019 11:54:39 PM  
Affiliation  
Armstrong-Keta Inc

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ARMSTRONG-KETA INC.

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Phone: (907) 586-3443; Cell: (907) 723-2222

E-mail: [aki@ak.net](mailto:aki@ak.net)

Members of the Board of Fish,

I am writing today to express my strong support for continuing the exceptionally effective and circumstpect system of hatchery oversight that the Alaska Department of Fish and Game has developed over years of Alaska hatchery operations. ADF&G has always taken a conservative approach to evaluating any proposals by hatchery operators in light of the paramount importance of healthy wild salmon populations. Their protocols for condering any increments of hatchery production are thorough and frequently result in rejection or modification of the hatchery proposals in order to avoid risk to wild runs, or where no impacts are obvious, to gain more empirical evidence of the interactions between hatchery and wild populations by approving only conservative increments of hatchery production with enough years at that level to monitor and evaluate the effects before subsequently either approving additional production, holding the hatchery production at the initial level, or rejecting the production altogether if negative impacts are detected.

Most relevant to the current discussion is concern about the straying of hatchery fish. It is important to note right off the bat that hatcheries are as vitally concerned as anyone in the state of Alaska about the potential for hatchery fish, including via straying, to have an adverse effect on wild populations. All salmon hatcheries in Alaska are non-profit by state law, and no one in the system has a financial incentive to impair the health of the wild salmon runs. Quite the contrary, the commercial and sport fisheries are the beneficiaries of the hatchery programs and are the sole reason that the hatcheries operate at all. These end users have no desire or incentive to threaten wild Alaska salmon with enhanced production, and the hatchery operators share the goals of their constituents.

The hatchery operators have pooled their resources for several years now to study the effects of straying hatchery fish on wild poplutions. This mult-year study is not yet complete, but preliminary results show minimal effects by hatchery production on wild runs. All salmon, wild or hatchery, stray as an evolutionary adaptation to maintain genetic diversity and vigor, as well as a means of populating new environments or repopulating watersheds that have experienced catastrophic collapses. There is no evidence that hatchery fish stray in any greater frequency than wild fish. And there is no evidence that straying per se is a negative behavior.

The main threat of excessive straying is if hatchery production of a broodstock not well adapted to the local environment is produced in such numbers that a depressed wild population is overwhelmed by greater numbers of returning hatchery spawners than the wild fish returning to the same spawning grounds. This is exactly the type of scenario that ADF&G's regulations and close management of hatcheries is designed to preclude. Unfortunately, this problem has sometimes occurred in the Pacific Northwest, and often the problems there are projected onto a completely different situation in Alaska, where management has been much more scientific based and cautious. We have an extremely successful program in Alaska that is in no regard broken. I encourage the board of Fish to continue to support the exemplary management practices of ADF&G and not interefere with the excellent scientific management of hatcheries by the professionals in that department.

Thank you for your consideration,

Robert Watson  
General Manager,  
Armstrong-Keta, Inc.



Submitted By  
Russell Cockrum  
Submitted On  
2/20/2019 11:11:05 AM  
Affiliation  
Commercial fisherman

Phone  
907-617-7030  
Email  
[Russ@vikingmaid.com](mailto:Russ@vikingmaid.com)  
Address  
5791 north Tongass highway  
Ketchikan, Alaska 99901

To whom.

I am a southeast Alaska seiner (42 consecutive seasons) and if it was not for enhanced chums I would be out of business. Last year alone I caught over 400,000 # of hatchery chums and only 150,000 # wild fish (nearly all pink). This supported 5 life long Alaskans on my crew... please do not mess with our working and proven formula here in SE Alaska .....



Sitka ♦ Craig ♦ Valdez ♦ Naknek ♦ False Pass

P.O. Box 1742 Cordova, AK 99

Phone: (907) 738-7202



PC083  
1 of 1

February 20, 2019

Chairman Reed Morisky  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811  
Submitted via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Comments on March 8 Board of Fisheries Hatchery Committee

Dear Chairman Morisky and Alaska Board of Fisheries Members:

Thank you for the opportunity to provide comment on the board's Hatchery Committee meeting scheduled for March 8, 2019.

Silver Bay Seafoods is a vertically integrated, primarily fishermen-owned processor of frozen salmon, herring, and other seafood products for both domestic and export markets. Silver Bay began in 2007 as a single salmon processing facility in Sitka, Alaska, remains headquartered in Sitka, and has since grown into one of the largest seafood companies in Alaska. Silver Bay has state of the art, high volume processing and freezing facilities throughout Alaska, currently operating in Sitka, Craig, Valdez, and Naknek. The company is also active in the California squid fishery and is currently constructing a seafood processing facility in False Pass, where we will process salmon, pollock, and cod.

Silver Bay remains supportive of the board's original intent to provide opportunity for the public and board members alike to receive reports from Alaska's Department of Fish and Game (ADF&G) on management, production, and research relating to Alaska's salmon fishery enhancement program. In the future, we encourage the board to consider holding one annual meeting of the Hatchery Committee or its equivalent, where such meetings will not be open for regulatory actions and no hatchery-related petitions or agenda change requests (ACRs) will be considered as action items. Further, we recommend that more involved reviews of area-specific hatchery-related issues and potential regulatory action be limited to each area's regularly scheduled meeting cycle in the future. Finally, given our own fleets' current participation in fisheries elsewhere, we expect fishermen attendance on March 8 to be less than that which was seen at the board's October 2018 Work Session. However, we assert that the overwhelming public support for Alaska's salmon hatchery program remains as was evident throughout the board's deliberations on these issues in 2018, and recommend that the board consider holding future Hatchery Committee meetings during regularly scheduled Work Session meetings each fall. We believe that doing so will enable greater participation by those commercial fishery stakeholders who stand to benefit from participation in these meetings.

Thank you for your service to this valuable resource and the communities that depend on it.

Sincerely,

Tommy Sheridan  
External Affairs  
Silver Bay Seafoods  
[tommy.sheridan@silverbayseafoods.com](mailto:tommy.sheridan@silverbayseafoods.com)



Submitted By  
Sonja Corazza  
Submitted On  
2/20/2019 9:15:10 AM  
Affiliation

To the Board of Fisheries, I am a lifelong commercial fisherman (woman), the last 36 years being a seiner in Prince William Sound. I have my own salmon seine permit for that fishery along with my husband Rich who owns one and both of our adult children have seiners and permits in the same fishery. It is well known that the hatchery program was started by local fishermen from Cordova after the 1964 earthquake devastated many of the salmon streams in PWS due to the upliftng effect of the earthquake. This last fall of 2018 we all had a large meeting with you, The Board, in Anchorage which was well attended by fishermen and many studies were presented with the final conclusion being that no emergency situation existed which would justify immediate action on hatchery production. It was generally agreed that particular meeting was mainly a political ploy iniated by those opposing hatcheries. That political agenda should be taken into account during these present proceedings. Having spent 36 years in PWS I do understand that pink salmon production has increased, however so have the outside stresses on pink salmon in general and the hatchery system is still the best option of preserving salmon and remaining an economic engine for coastal towns and businesses all over the State of Alaska. Some of the stresses are the recognized climate issues of water temperature, the illegal fishing of other nations in the North Pacific, the by-catch of factory trawlers, interception by other fisheries and MOST IMPORTANTLY at this time, the predation of pink salmon and especially hatchery pink salmon by whales, hundreds of whales by legitimate counts. It is a legitimate fear that of all the pink salmon being released at this time we could be losing from 25% to 50% of the release to whales that are targeting the fry when they are released to the waters of the Sound. If that is the case then we need to keep the production high just to offset the loss. In fact due to predator loss the survival rate of the pinks may actually be what it was 10 years ago. If we are losing that percentage of pinks when they are released and if you cut it back it may effectively destroy the program that has kept the Sound a healthy and productive fishery. My understanding is that there are several studies happening at the same time that will give us more data on the reality of the fisheries at this time. Why not wait until all that information has come in before taking a step that could be the death blow to the program and have a destructive effect on the State economy as a whole since the ripple effects of the hatchery program create millions and millions of dollars for our economy. Here in Homer where we live there was a lot of talk from locals about PWS pinks being found in the local streams but the reality is, if you study the numbers, that it was mainly one small stream that didn't have it's own strong run and was nearly depleted for many years. Study the stream numbers for that before using it as a bad example because other types of salmon were in that stream also but PWS got all the news. If PWS hatchery fish had over taken the other fish species as has been suggested then it would seem the hatchery stocks would be massively successful year after year but that is not the case. The hatchery runs are variable just like the wild runs, with great fluctuations and do not follow our most hopeful predictions; they continue to be a mystery year after year just like wild runs. In PWS we are most happy with the fact that the hatchery and wild runs seem to be running in equal strengths over time. ADF&G management of the Sound has been exemplary and we are thankful for our excellent area biologists. As far as the theory that king salmon and pink salmon numbers have a connection I would like to say that until we have more accurate king salmon catch numbers that is a false conclusion. Last summer I accidentally opened a page that showed page after page of tickets for unreported sport fish salmon catches. It seems lots of people are catching fish that are not being reported. Add to that some of the well advertised illegal catches by sport fishing guides and it makes the reported number unreliable. For all of these reasons I am requesting that all of you on the Board of Fisheries to please give the hatchery system a chance to survive while research into many areas that are pertinent to this issue continues. While there are those in Alaska who would like to destroy the hatchery system I believe that would be a terrible mistake as it is one of the life giving programs that helps many people and businesses in our state. Thank you, Sonja Corazza



Southeast Alaska Guides Organization  
1600 Tongass Avenue  
Ketchikan, AK 99901

February 20, 2019

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811

Re: Hatchery Enhancement Southeast Alaska

Members of the Board,

Southeast Alaska Guides Organization (SEAGO) represents the interests of charter operators, fishing lodges, and guided anglers throughout the southeast region. Together, these groups contribute substantially to local revenues and jobs. The sport industry is dependent on a variety of salmon species, all of which are currently enhanced by hatchery production.

In some Southeast sport areas, hatchery fish represent nearly 50% of harvest (e.g. king salmon hatchery contributions to sport harvest in both Ketchikan and Juneau districts).

Risks of hatchery production appear to fall into two categories—genetic intermingling of production and wild fish, and competition for spawning habitat or food. Genetic mixing only occurs via straying. Studies done by ADF&G show less than 2% (average 0.5%) hatchery presence of chinook in all but one southeast drainage, with the exception landing on 11%. Hatchery pink salmon in PWS showed a higher rate of straying, but exhibited similar levels of straying by wild stock. There is no conclusive evidence that straying and intermingling of hatchery and wild fish pose detrimental effects to indigenous stocks.

Carrying capacity of the ocean and spawning habitat is the second risk factor. Hatchery reared salmon could compete for food or spawning space with wild fish. While possible, hatchery production does not threaten to collapse capacity. Capacity is influenced by several factors, including cyclical trends in ocean productivity. Modeling of carrying capacity is ongoing, and concern for competition should not force a halt to enhancement while results are pending. Supplementing wild stock has occurred in Alaska for decades, during which fisheries have realized record high returns.

Alaskan enhancement protocols were developed in collaboration with many of the best minds who had learned important lessons from failures in the Pacific Northwest programs in prior years. Alaska established regulation with specific intent to minimize risks that could negatively impact wild runs, addressing genetics, pathology, and conservative management.

Ultimately, the effects of hatchery fish on wild stock populations is still inconclusive, but safeguards built in to Alaska enhancement protocols virtually eliminate the risk of irreversible



damage. Given the value of contribution of hatchery production to fishery harvest, Southeast production should be allowed to continue while science continues to vet potential problems.

Sincerely,

A handwritten signature in black ink, appearing to read "Forrest Braden". The signature is fluid and cursive, with a large initial "F" and "B".

Forrest Braden  
SEAGO Executive Director  
[forrest@seagoalaska.org](mailto:forrest@seagoalaska.org)



## **UNITED SOUTHEAST ALASKA GILLNETTERS**

February 20, 2019

Alaska Board of Fisheries  
Alaska Department of Fish and Game, Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

**Re: Hatchery Committee**

Dear Chairman Morisky and the Alaska Board of Fisheries,

We applaud the opportunity to tell the enhancement story, its history, stringent regulatory process and oversight, to name just a few. We are especially pleased to conduct this process in the BOF arena so the greater public has access to ALL the information.

**We tell you Alaska's salmon enhancement program is truly unique in the world-**  
others will cite findings from different states and say they apply

**We tell you that Alaska adheres to a comprehensive salmon plan that was developed over decades and had input from all stakeholders and uses the best science-**  
others will say that enhancement activities have no guidelines or limits

**We say the RPT allows for stringent review and is an open and transparent process-**

others will say that twenty some years ago there was a problem in **one** area

**We say new production is virtually non-existent or incremental allowing for evaluation-**  
others have asked to reduce production to 75% of 2000 levels

**We say Regional Associations have been a bright star that have given financial stability to coastal communities and local fisheries-**  
others will say that we are exceeding ocean carrying capacity without relevant data

**We say our futures depend on wild stocks, and are spending millions of dollars to try to evaluate, unbiasedly, the effects of hatchery fish straying into wild systems-**  
others say the data is tainted because of the funding source

We ...we salmon fishermen with limited entry permits voluntarily assessed ourselves to try to balance the boom and bust cycles of salmon returns and to stabilize the price, in part by stabilizing volume.

We believe we are correct in saying that WE exceeded our wildest dreams! Those pioneers, many who never reaped a dollar in return, created a process that had been so thoroughly vetted, that looked far into the future, that gave every protection to wild stocks; and that lifted all boats-sports, charter, subsistence, in its wake. Our only guilt is being too successful.

Yes, we should evaluate. Yes, the BOF should make it a priority to be informed and understand the regional concerns, and separate fact from fiction. Thank you for this opportunity to tell the whole story... please have patience and wait for all the best information to come to light.

Thank you,

*Susan Doherty*  
Executive Director SEAS

*Amy Daugherty*  
Executive Director ATA

*Max Worhatch*  
Executive Director USAG

*Kathy Hansen*  
Executive Director SEAFA

**Additional names will be added prior to the committee meeting**



**Resolution 19-02**

**A RESOLUTION IN SUPPORT OF THE ALASKA SALMON HATCHERY PROGRAM UTILIZING UNBIASED AND SCIENTIFIC METHODS TO ASSESS THE INTERACTION OF ALASKA'S SALMON HATCHERY PROGRAM WITH NATURAL SALMON STOCKS**

**WHEREAS**, the communities and businesses of Southeast Alaska benefit greatly from the State of Alaska Salmon Hatchery Program; and

**WHEREAS**, Alaska's salmon hatchery program has operated for 45 years and supplements wild salmon harvests throughout the state; and

**WHEREAS**, Alaska's salmon hatchery program is an example of sustainable economic development that directly benefits subsistence fishermen, personal use fishermen, sport fishermen, charter fishermen, commercial fishermen, seafood processors, as well as state and local governments, which receive raw fish tax dollars; and

**WHEREAS**, Alaska's salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations; and

**WHEREAS**, Alaska Department of Fish and Game regulates hatchery operations, production, and permitting through a transparent public process and multi-stakeholder development of annual management plans; and

**WHEREAS**, returns of hatchery and wild salmon stocks follow similar survival trends over time and the largest returns of both hatchery and wild salmon stocks have largely occurred since hatchery returns began in about 1980; and

**WHEREAS**, there are no stocks of concern where most hatchery production occurs, indicating that adequate escapements to wild stock systems are being met in these areas over time; and

**WHEREAS**, Alaska hatcheries contributed an annual average of nearly 67 million fish to Alaska's commercial fisheries in the past decade; and





**WHEREAS**, Alaska hatcheries accounted for 22% of the total common property commercial catch and 43% of the total ex-vessel value in the Southeast region in 2016; and

**WHEREAS**, a [McDowell Group report](#) identifies the economic contribution in 2017 of the Southern Southeast Regional Aquaculture Association (SSRAA) to be 680 jobs, \$32 million in labor income, and \$70 million in total economic output; and

**WHEREAS**, Alaska's salmon hatchery program has proven to be significant and vital to Alaska's seafood and sportfish industries and the state of Alaska by creating employment and economic opportunities throughout the state and in particular in rural coastal communities; and

**WHEREAS**, Alaska's salmon hatchery program is non-profit and self-funded through cost recovery and enhancement taxes on the resource and is a model partnership between private and public entities; and

**WHEREAS**, the State of Alaska has significantly invested in Alaska's salmon hatchery program and associated research to provide for stable salmon harvests and to bolster the economies of coastal communities while maintaining a wild stock escapement priority; and

**WHEREAS**, Alaska salmon fisheries, including the hatchery program, continue to be certified as sustainable by two separate programs, Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC);

**THEREFORE BE IT RESOLVED** that the Southeast Conference affirms its support for Alaska's salmon hatchery programs; and

**FURTHER BE IT RESOLVED** that the Southeast Conference supports unbiased and scientific methods to assess the interaction of Alaska's salmon hatchery programs with natural salmon stocks, such as the Alaska Hatchery-Wild Salmon Interaction Study which began in 2011 and is scheduled to conclude in 2023; and

**FURTHER BE IT RESOLVED** that the Southeast Conference calls on the Alaska Board of Fisheries to work with the hatchery community, the Alaska Department of Fish and Game and industry leaders to further its understanding of the importance of the Alaska salmon hatchery program to all Alaskans.

**ADOPTED BY THE SOUTHEAST CONFERENCE MEMBERSHIP AND BOARD OF DIRECTORS ON September 14<sup>th</sup>, 2018 AND WILL SUNSET ON September 14, 2019.**

Witness:

Dennis Watson – President

Attest:

Robert Venables – Executive Director



*Southern SE Regional Aquaculture Association*

*14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348*

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February 19, 2019

Alaska Board of Fisheries  
Mr. Reed Morisky, Chair

*By Electronic Copy Only: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)*

Re: SSRAA comments related to the Alaska Board of Fisheries Hatchery  
Committee agenda topics

Dear Chair Morisky and members of the Board of Fisheries,

Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law, which was originally incorporated in 1976. SSRAA, along with the State's other regional hatchery associations and the associated private non-profit salmon hatcheries, have a substantial and self-evident interest in the topic referenced above.

**1. Regarding salmon straying:**

Since all hatchery origin pink and chum salmon in Prince William Sound and Southeast Alaska have been otolith marked it has been possible to find and estimate the number of hatchery fish "straying" to spawn in wild stream systems. However, it is never been practical to determine straying from one wild system to another. The pink salmon tagging studies that were done following the Exxon Valdez oil spill in Prince William Sound suggested upwards of 30% of wild pink salmon strayed in some years. Contrary to the popular myth of perfect homing fidelity among salmon species – it has been revealed that they all stray to some degree. Most straying is of short distance, to nearby systems - but some straying can be for hundreds of miles. This aspect of salmon biology and behavior is likely what has kept them viable as a species for such an extended period of time. With various natural disasters such as stream blockages and weather events that would have otherwise wiped out whole populations of salmon, the propensity to stray and recolonize previously-impacted systems are what has kept salmon stocks healthy for untold thousands of years.

What does this mean in terms of hatchery salmon potentially impacting wild systems? The Alaska Hatchery Research Project ("AHRP") is specifically designed to answer those questions, and there are many of them. Although it takes patience and understanding to



wait for complete results and analysis in such a massive science project as AHRP, the end product will provide reasonable objective certainty as to the potential impact. As in all cases with large data sets and observational viewpoints, expect a certain amount of debate as to what the results actually “prove” – but simple common sense dictates that when wild pink and chum numbers have remained robust for over 30 years right alongside large-scale hatchery production, there could be no irreparable harm to those wild stocks. In fact, if there is no permanent or long-term loss of fitness through two generations of hatchery and wild fish cross spawning in natural streams, then hatchery fish may actually help support smaller stocks of naturally produced fish.

## **2. Regarding the Regional Planning Team process:**

The Regional Planning Teams (“RPTs”) have worked exceptionally well in bringing the hatchery associations together with the Department and the public to make critical decisions regarding siting and production. Each Permit Alteration Request (“PAR”) considered at the RPT is extensively vetted and voted upon by the group, and none are final until signed by the Commissioner of Fish and Game.

RPTs meetings are public meeting, with statutory transparency and a long history of open and fair discussions. The association RPT members are appointed from within those bodies, which are made up of a broad cross-section of citizens representing different constituencies within that region. At SSRAA, in addition to the fishing industry representatives, those sectors are: Public at-large; Native Corporation; Chambers of Commerce; Municipalities; Sportfishing interests; and Subsistence users. These are the groups of citizens who have a say in the RPT process through the SSRAA board of directors, meeting publicly, according to statutory authority.

What many people who are unfamiliar with the process don’t realize is that many of the actions considered for action at the RPT level have already been considered thoroughly multiple times with the Department’s managers and area biologists, with the association boards of directors, and at the RPTs themselves under the preliminary discussion agenda. Because of this extensive vetting before PARs are even brought up for action, with the PARs sometimes going through many changes in response to input at every level, it’s no wonder that it could seem to critics as though these PARs are “routinely” passed. The rigorous process that PARs go through before they are ever voted on and sent to the Commissioner is a direct cause of that.

Personally, having been a municipal official in Alaska over the last 20 years, it’s not difficult to see how critical individuals feel disenfranchised from the RPT process. It is a universal phenomenon that loud voices will “call out” a process that was specifically designed to be public and transparent because they either weren’t aware of it or had ignored it until it mattered to them in some way. This observation is extremely common and is simply human nature at work. Certainly, there are ways to increase public awareness of RPT meetings and the issues that are being taken up. This would be the

case no matter what the process – there are always ways to increase awareness and participation if time and money are unlimited. There are ways to increase the visibility of every single public process ever devised, including the very public Board of Fisheries meetings. But for citizens to criticize RPTs as somehow mysterious and opaque is simply not an honest assessment of reality.

### **3. Regarding enhancement research:**

The hatchery community is science-based and ecologically focused: we make decisions in close coordination with exceptionally well-qualified ADF&G managers and biologists, geneticists, pathologists and other science professionals, along with fisheries managers that are renowned as the best in the world. Collectively, the Alaska salmon hatchery community has worked for over 50 years to craft a well-functioning system that has robust regulatory oversight and a common understanding of what it takes to lead the world in sustainable, environmentally friendly salmon culture practices.

As referenced earlier, the Alaska Hatchery Research Project is an ambitious, expensive ongoing study that will answer many questions surrounding straying impacts particularly. This is research that the associations and PNPs are quite anxious to learn and understand, since our industry and the sustained production of wild fish are so inextricably intertwined. We urge the Board to take a similar stance that the sustainability certification agencies such as the Marine Stewardship Council (MSC) have taken and adopt a cautious wait-and-see approach in conjunction with the completion of the AHRP. We feel confident that a fair analysis of the AHRP conclusions will support our industry, and we welcome the opportunity to participate in any other scientific research-based exercises.

The Alaska salmon hatchery community is united in concern for our industry, a primary economic and cultural driver for the State of Alaska.

Thank you for your consideration of these comments. As a final thought, please consider the fact that the decisions you make regarding the well-conceived and managed, fully-mature and productive Alaska hatchery system are ones that have real impacts on the lives of countless fishermen – whether they be commercial, sport, subsistence or personal use.

Sincerely,

/s/

David Landis  
SSRAA General Manager

Submitted By  
Spencer Richter  
Submitted On  
2/20/2019 8:12:56 PM  
Affiliation

Phone  
907 617 6719

Email  
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Address  
1500 emerald cove  
Edna bay , Alaska 99950

My name is Spencer Richter, I've fished on and owned boats my entire life in southeast Alaska, SE gillnetting has been my main source of income since 2014. The hatchery programs that are in place today are a huge contribution to gillnetting, as well as the siene and troll fleet. The hatchery Chum, king and coho salmon that make up a very large part of our fishery are very important to our lively hoods and family's. I also feel that the hatchery fish, especially the terminal fisheries the hatcheries make possible takes pressure off of the wild stocks, with out them more fisherman would target wild stocks. I support the current hatchery programs we have in place and it would be a major hit to myself and many others if the hatchery programs were reduced or terminated.

thank you for your time

Spencer Richter

F/V Resolution

Submitted By  
steve paris  
Submitted On  
2/20/2019 1:20:16 PM  
Affiliation  
gill netter owner/operator

Phone  
2532099588

Email  
[harborparis@centurytel.net](mailto:harborparis@centurytel.net)

Address  
9716 crescent valley  
gig harbor, Washington 98332

AS a stakeholder in the salmon fishery in SE Alaska, number one for me is a susstainable fishery and hatcheries help to maintain my livelyhood. Thank you.

Submitted By  
Steve Tutt  
Submitted On  
2/20/2019 9:27:36 AM  
Affiliation

To: Hatchery Committee

From: Steve Tutt, Prince William Sound seine and gillnet permit holder, Cook Inlet seine permit holder

I am a 54 year Alaska resident and have lived in Homer since 1980, my three sons were born and raised in Homer, and all currently own/operate PWS seine boats and permits, and my son-in-law was born and raised in Homer and also owns/operates in the PWS seine fishery.

Our entire family hunts, sport fishes, recreates, and derives its income from southcentral Alaska, our joint investment in these fisheries exceeds 6 million dollars in equipment and permits, as well as significant investment in land, homes, warehouse space, etc. Our annual local fishery related expenditures exceed \$1,000,000,000 in local, state, and federal taxes, permit fees, net repairs and maintenance, vessel repairs and maintenance, food, fuel, harbor fees, boatyard haulout and storage fees, vehicle and trailer purchases, air travel, road travel, and other support services.

We spend money in a broad range of coastal communities including Homer, Cordova, Valdez, Whittier, Seward, and Anchorage. This winter alone more than \$100,000 worth of vessel improvements and \$75,000 worth of net maintenance are being done in Northern Enterprises Boatyard in Homer by our family.

To say that the hatcheries of Southcentral Alaska are significant to our family is a gross understatement, indeed they have been 'the' significant stabilizing economic factor that allows the younger generations of lifelong Alaskans to make Alaska their permanent home and the home of their permanent occupation. They have become permanent significant contributors to the social and economic fabric of this region for many years to come, raising their children here, building homes and businesses, and adding to the healthy society of our community.

We love what we do for a living, my grandchildren will be the fourth generation to grow up fishing and recreating in Alaska enjoying the benefits of well managed fisheries, hatcheries, and game. We love where we live and intend on living and spending our income 'in' Alaska. We love how we live, we hunt, sport fish, snowmachine, ski, and raise our families in the most amazing place on the planet.

Our Alaskan lifestyle and experience has been 'enhanced' immeasurably by ongoing quality management of resources and fisheries enhancement projects on land and sea. The hatchery programs will continue to be an integral part of our experience.

I represent five southcentral Alaska families, and yet our socio-economic footprint is large. Stable family and stable economics are vital to a stable society and economy. There are hundreds of families statewide like ours that have a positive and even more significant economic impact on Alaska.

I respectfully encourage this committee to consider that the hatcheries in PWS, in particular, have coexisted alongside sustainable wild stocks and have enhanced sport, subsistence, personal use, and commercial fisheries for 40 years. We have experienced record returns of wild pink salmon in PWS in recent years in conjunction with hatchery produced runs and there are sound scientific studies in progress that give greater insight to how these fisheries have been coexisting in positive ways.

Respectfully Submitted, Steve Tutt

Submitted By  
Thomas A Fisher  
Submitted On  
2/20/2019 7:30:03 PM  
Affiliation

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3603255688

Email  
[port-malmsbury@hotmail.com](mailto:port-malmsbury@hotmail.com)

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Juneau , Alaska 99801

As a lifelong salmon Troller and a 30 year board member of SSRAA and a member of the southern RPT, I am very much in support of the hatchery program to be continued as it is currently operating. Hatchery operations, permitting, and management have considerable scrutiny by the public, ADFG, and the commercial fishing industry giving plenty of checks and balances. The fishing industry of South East Alaska both commercial and sport is very dependent, and the industry wouldn't be near the size it is today without the hatchery program. The hatchery program isn't broke and there is no need for a fix.



Submitted By  
Tim Cabanasees  
Submitted On  
2/19/2019 8:19:31 AM  
Affiliation

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9076328467

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Girdwood, Alaska 99587

Having fished my own boat for 40 years and came to many meetings I would just like to say please leave your predetermined opinion of the hatcheries at home. Use this time to actually listen to the facts, try to improve for the better our fisheries as a whole and let this rare process most states do not have to let the average Joe help explained how these fisheries effect vast numbers of fishermen in this State. My children are now joining the fisheries and for there future and the rest of the young upcoming peoples of the state your actions at the board could leave them with a bright future based on facts and not on personal ideas or politics... thanks for your time and effort to be on the board of fisheries. Tim Cabana lifelong fisherman.

Submitted By  
Tom Meiners  
Submitted On  
2/20/2019 3:49:20 PM  
Affiliation  
Self

Phone  
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Email  
[thomasm.meiners@gmail.com](mailto:thomasm.meiners@gmail.com)  
Address  
805 goldbelt ave  
Juneau, Alaska 99801

Board of Fisheries:

My name is Tom Meiners and I am a 29year old, Alaskan purse seiner. I have participated in the Southeast purse seine fishery as a deckhand since '06, as a skipper since '14 and as a boat owner since '17. I now have the privilege to serve on the Southeast Seiners Association (SEAS) board of directors, and the Northern Southeast Regional Aquaculture Association (NSRAA) board of directors. As a fishermen in the fleet, and now also as a member of the NSRAA board, I have been able to see first hand, the incredible positive impacts that our SE hatcheries have for our fishermen and residents, and how well staff and the department work together to create value for the fleets, sport fishermen, southeast community members and residents. Hatcheries drive economies in our small coastal communities, provide jobs for local residents, are stewards of our coastal ecosystems, educate locals and tourists alike, as well as providing fish in our fish holds, product at the plant, and food for the world.

As a member of the NSRAA board, I have had the privilege of seeing how the association works with both state and federal entities to make sure that existing and new hatchery programs are the correct fit for the lands and ecosystems of our region. At NSRAA we have a 25 member board of directors made up of fishermen, community members, and interested persons who work directly with staff to make sure that the organization is headed on the correct course. In addition, I have participated in the RPT process as an NSRAA representative, where we did not approve permits for a project that we didn't feel would benefit the local ecosystem and local residents and fishermen.

In conclusion, I would like to voice my strong support for hatcheries and the hatchery process. I have seen first hand the care that goes into crafting new projects and taking care of existing ones. The scrutiny that these projects go through, at the board level, RPT level, and ADF&G level should not be understated, nor should we underestimate the competence of the individuals that oversee these projects. ADF&G, the hatchery associations and PNP's use the best science available to inform their decision making process, and deeply care for the natural world that we all work, play and live in.

Submitted By  
Tracey Nuzzi  
Submitted On  
2/18/2019 3:20:03 PM  
Affiliation

Alaskan fisheries and Alaskan hatcheries have a lot to be proud of - attributed to pioneers of our state, Fish & Game sustainable management system, and habitat protectors. We all appreciated the October presentation on the history, genetic straying work, and complications of tackling ocean carrying capacity.

Anti hatchery claims (for instance, that pink salmon production is decreasing size and abundance of chinook salmon) is easy to throw into a proposal; but if relying on the science community, it can not say eliminating hatcheries will solve weak chinook runs. **We must be careful that the BOF is not relying on public comment too much for answering these complex biology, ecology questions...** my self included.

I am a fishermen, a mother of two little fishermen (1 & 3 yr old), resident of rural coastal community, and proud of the elders that helped create our hatcheries. It was fishermen that took the reins of many of the State hatcheries in the 1970s. For instance, PWSAC operates 3 State owned hatcheries. Alaska is charged to protect for sustainability but also creation of industries of its resources. **Hatcheries in AK were created differently than in the lower 48 - with regulations of distances from wild stream, local source of brood, etc...** **We should be proud.** We have strong wild runs in Prince William Sound, right along side PWSAC, thanks to cooperation between fishermen and managers (can be rocky but we both need each other).

**PWSAC gives our community of Cordova value in employing its residents and providing revenue for raw fish tax to support running our city. Salmon is the currency of our community.**

I do agree that annual updates to the BOF from the RPTs are a great communication tool. We are all in this together.



5303 Shilshole Ave. NW, Seattle, WA 98107-4000  
(206) 783-3818 • Fax: (206) 782-7195

November 20, 2019

Alaska Board of Fisheries  
Reed Morisky, Chair  
Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: On-time comments for March 8 Hatchery Committee

Chairman Morisky and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Hatchery Committee scheduled for March 8.

Trident is heavily invested in the sustainability of Alaska's wild salmon. We operate eleven facilities that process salmon throughout Alaska and employ more than 3,000 workers in salmon processing labor. We buy and process all five species of Pacific salmon and have made significant investments in our facilities to ensure that we remain competitive to the independent fishermen that we purchase from and in global markets where we sell Alaska salmon. Hatchery-origin pink and chum salmon provides important stability that allows us to maintain operations, support our independent fishermen and communities where we operate, and expand markets through investing in new product development and sales strategies, all of which benefits the State of Alaska.

Since its inception, the hatchery program has been built upon science-based management, a transparent public process, and a regulatory framework that prioritizes protection of wild salmon populations. The strength of the program is not due to any one regulation or policy; rather, it is the sum of its parts that allows it to remain deliberative, precautionary, and adaptive to new science, stakeholder input, and management needs. Accordingly, we support the Board's willingness to provide a forum for Alaska Department of Fish and Game (ADF&G) to review components of the program that were not on the agenda during the October 2018 work session.

The staff presentation, as well as the March 7<sup>th</sup> Alaska Hatchery Research Project informational meeting,<sup>1</sup> will provide a helpful framework for the open forum discussions. While we appreciate the opportunity to have an open dialog on issues such as acceptable hatchery stray rates and enhancement related research, we think it is critical that managers take a deliberative, precautionary approach to these complex issues. This means ensuring that the best available science is filtered through a decision-

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<sup>1</sup> The meeting will provide an update on research completed to date and an update on ongoing and planned work. Information on the meeting available at: <https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=192975>.



5303 Shilshole Ave. NW, Seattle, WA 98107-4000  
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making process that can objectively evaluate risk and uncertainty. Decisions regarding acceptable levels of straying must include an understanding of environmental and genetic factors that influence straying, and also include research that quantifies the effect of straying on wild stocks. Those decisions must also be considered in the context of applicable laws, regulations, and policies that make up the hatchery management framework, as well as the comprehensive and annual salmon plans. To that end, the results of the Alaska Hatchery Research Project,<sup>2</sup> once complete, will be an important first step in ensuring that hatchery program continues to deliver on its mandate to not harm wild stocks.

Moving beyond the committee meeting, Trident appreciates the Board's efforts to find ways to increase the transparency and predictability of the hatchery program. We support holding an annual hatchery meeting, pursuant to the Joint Protocol on Salmon Enhancement, as a means of fostering dialog and education amongst stakeholders, Board members, and ADF&G. The Board could also consider incorporating minutes from the Regional Planning Teams and hatchery-related proposals into the regular three-year finfish cycle for each region. Taken together, these steps could provide for a better public process.

Thank you again for the opportunity to comment.

Sincerely,

Shannon Carroll  
Associate Director of Public Policy  
Trident Seafoods Corporation

<sup>2</sup> For more information on the project, see <http://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesResearch.main>.

Submitted By  
Tryve Westergard  
Submitted On  
2/10/2019 8:21:50 PM  
Affiliation

Phone  
9072543244

Email  
[Westergard@hotmail.com](mailto:Westergard@hotmail.com)

Address  
POBOX 5775  
Ketchikan , Alaska 99901

Hello, I want to give my support to the hatcherys around ALASKA. They have done a great job of supporting our fisheries and keeping an industry alive. My business is in almost every aspect supported by hatchery in one form or another. From packing hatchery caught fish, transporting fry, support to the hatchery and many other trickledown economics. I wish I had time to write a more in-depth message but due to work I can't. I want to make sure the people of ALASKA realize how much business hatcheries bring to ALASKA and give my support 100%



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

February 20, 2019

ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: Comments for Hatchery Committee**

Dear Chairman Morisky and Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast.

United Fishermen of Alaska strongly supports Alaska's hatchery programs that have been in production for over 45 years. These programs supplement wild salmon stocks which directly benefits subsistence, personal use, sport, and commercial fishermen, as well as seafood processors, state and local governments.

We recognize there has been a recent decline in some Alaska Chinook salmon stocks; however, there is no scientific evidence suggesting the decline is due to chum or pink salmon hatchery production. In fact, there have been many years in the past two decades with simultaneous high Chinook and wild and enhanced pink salmon returns.

Alaska's salmon hatchery program employs strong scientific methodology with rigorous critical reviews of hatchery operations based on Alaska's genetics policy, the origin of broodstock, scrutiny of rearing and release locations, and interactions with naturally occurring stocks.

UFA believes in the Regional Planning Team process and trusts that the Alaska Department of Fish and Game will continue to hold Alaska's hatcheries to high standards in regards to hatchery operations, production, and permitting through a transparent public process through the development of annual management plans.

We support the 2002-215-FB *Joint Protocol on Salmon Enhancement* which encourages the Board and the Department to have regular joint meetings to update the Board on hatchery issues including production trends, management, hatchery planning efforts, wild and hatchery stock interactions, biological considerations, and research. We recognize that the Joint Protocol on Salmon Enhancement had not been taking place on a regular basis over the past several years and believe with annual updates, the concern over hatchery production would not have arisen to the level it has.



UFA challenges ADF&G and the Board of Fisheries to foster an internal culture that is open to scientific, unbiased consideration of all fisheries enhancement and rehabilitation projects and methods.

Sincerely,

Matt Alward  
President

Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association  
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association  
Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association  
Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation  
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance  
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association



# UNITED SOUTHEAST ALASKA GILLNETTERS



PC099  
1 of 3

Box 2196, Petersburg AK 99833 \* (253) 279-0707 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

February 7, 2019

Chairman Reed Morisky  
Alaska Board of Fisheries

Dear Chairman Morisky and Board members,

We are staunch supporters of the hatchery programs. It has kept our fishery viable over the last thirty years. Over 80% of our permit holders are residents, and recognize the benefits enhanced fish has afforded us, as well the communities where we live. Growth in local gillnet fleets (Haines, Juneau, Sitka, Wrangell), growth in local processing, (Haines Pack, Alaska Glacier Seafoods, Icy Strait Seafoods, Sea Level), and local government investing in infrastructure and development of waterfronts, can all be attributed to enhanced salmon development.

On Agenda item 5, Hatchery stock straying, we have no recommendations at this time regarding additional study subjects. Our view is that the current study is comprehensive, and over time will give a clearer picture. That being said, we are not opposed to any recommendations that are science based and attainable.

To determine an acceptable level of straying of hatchery fish, we would need to know the level of straying that occurs for wild fish. We do know that salmon have adapted to stray as a survival strategy. We know that if salmon did not naturally stray, we wouldn't have any in our state. We do know, through otolith sampling that hatchery fish do stray. What we don't know is if straying behavior is a fairly static percentage of the stock, or straying behavior triggered by run size, weather conditions, or other variables. An acceptable hatchery stray level would be one that mirrors normal behavior of a specific species of salmon in the wild.

The best long-term mitigation for addressing straying we see at this time would be robust harvest of these fish, in that a caught fish is not going to stray. It is important to recognize that each gear type brings a certain efficiency in harvesting hatchery fish, depending on location, run size, market conditions, gear type efforts, etc. Hatchery operators and the department should have all the tools possible to best harvest and minimize straying.

Concerning Agenda item 6, at this time we have not identified any potential improvements to the RPT public process. Our organization regularly attends and



participates in the RPT process. Two of our board of directors are gear group representatives at the RPT. The chair and RPT members will consider any items from any source as an agenda item. The chair will recognize, and invites, any of the public in attendance, or by teleconference, a chance to speak at any time during the meeting. Comments can be submitted to the RPT at any time. The meetings are publicly noticed, held in easily accessed venues, and a telephone number provided if you wish to participate by teleconference. Nobody is excluded or marginalized in their ability to participate in these meetings by the current public process. Hard to improve on that.

We have no additional improvements to the regulatory process for the RPT. We know that the RPT only makes recommendations. The commissioner of ADF&G, who receives a summary of each meeting, approves or denies those recommendations as he sees fit.

Concerning Agenda item 7, we have no recommendations for additional research efforts. The current study underway covers a range of topics pertinent to issues. We have every confidence in the researchers involved with this study, and have no recommendations for inclusion of others at this time.

Concerning Agenda item 8, we have no problem with the Board of Fisheries exercising their clearly defined legal authority in any matter. The BOF's charge is to allocate the fishery resources of this state. If BOF action were to usurp or diminish the RPT public process, we would be adamantly opposed.

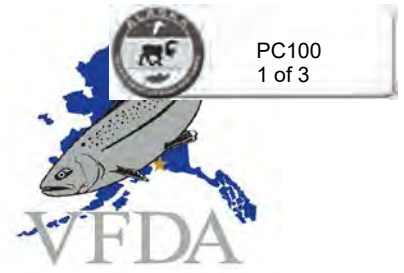
We appreciate your consideration of our comments.

Sincerely,

Max Worhatch, Executive Director, United Southeast Alaska Gillnetters



VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.  
SOLOMON GULCH HATCHERY



P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686  
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com

February 17<sup>th</sup>, 2019

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Hatchery Committee Meeting – March 8<sup>th</sup>, 2019

Chairman Morisky, Members of the Alaska Board of Fisheries:

The Valdez Fisheries Development Association Inc., (VFDA) offers these comments and suggestions as they pertain to the agenda for the ADFG Board of Fisheries (BOF) Hatchery Committee Meeting.

First, let me begin by thanking the BOF for its desire to renew the convening of the Joint Protocol on Salmon Enhancement #2002-FB-215. This important forum provides an excellent tool to inform and update the board and the public about hatchery policy, ongoing hatchery related research and current trends and planning processes for hatchery production. Because this protocol was suspended for many years by the board, critical information was not conveyed to the public, who seek to understand hatchery/wild salmon interactions and the regulatory structure governing Alaska's salmon fishery enhancement programs. VFDA fully supports restarting this vital informational process.

With respect to the Hatchery Committee meeting, VFDA offers these comments and suggestions for the topics of discussion set by the board:

### **Hatchery Stock Straying**

As our ability to study hatchery stock straying improves through mark and capture programs, we are learning more about the extent of this naturally occurring phenomenon. Pink salmon in particular, have a strong genetic propensity to stray which is not unique to hatchery stocks. Natural stocks of pink salmon also stray, potentially at rates comparable to those of hatchery origin. This fact was recognized when hatchery permitting and management plans were first developed.

While there is much we do not understand about straying or its impacts, significant research is being conducted to address these concerns. However, we are only now beginning to receive the necessary data to answer these questions and a complete understanding of hatchery/wild interaction is years from completion.

Recommendations on additional study subjects:

As we gather more comprehensive information from the Alaska Hatchery Research Project (AHRP), additional study topics will become evident. Hatchery marking programs provide an efficient method of determining the presence of hatchery fish in spawning systems. Unfortunately, the same cannot be said for natural stocks. Achieving a better understanding of this natural phenomenon will be necessary before scientific guidelines for acceptable stray rates for a given species can be created. To further this study, we must develop comparative analysis of natural stray rates for different spawning systems and habitat and geographical areas. The study of those spawning systems which contain consistently high rates of

hatchery strays require additional consideration. What causes this and how can it be mitigated through the application of fisheries management?

Views on acceptable levels of straying:

Science, not public opinion must lead policy development on this topic. In determining an acceptable level of straying of hatchery stocks, the following guiding principles should be considered;

- Rates of straying must be considered for each individual species, based on the species genetics, environmental conditions, spawning habitat and geographical population structure.
- The overall fraction of hatchery strays, not merely presence, is an important determining factor. The AHRP uses this robust analysis method for assessing the actual fraction of hatchery strays in a known region or management district rather than a simple percentage of origin in a given stream.
- The presence of hatchery strays does not necessarily equate to harm. The conclusions of the AHRP, the most rigorous study to date on the effect of hatchery straying on the fitness of natural stocks, is not yet complete. A determination of an acceptable level of hatchery straying cannot begin to be fully considered until the effect of hatchery strays on natural salmon populations is known.
- Finally, the long term effect of hatchery/wild interaction on escapement and abundance of natural stocks for areas with high hatchery production must also be considered. Prince William Sound has not only experienced high hatchery productivity, but also record natural pink salmon returns in recent years.

Recommendations on long range mitigation strategies

Future research and monitoring of the status of hatchery straying and effect should be continued. Broad monitoring programs designed to evaluate the extent of hatchery straying over time will provide data to determine the relevance of inter-regional straying on sustainability. Continued assessment of the effects of straying on natural stock fitness will be ongoing through the AHRP in the near term.

The continued implementation of aggressive fisheries management to harvest hatchery salmon stocks in areas where high fractions of hatchery strays are known is important. This will reduce the presence of hatchery stocks before they are given opportunity to stray. In addition, the department and the enhancement community should work together to develop and implement best management practices to reduce straying beginning at release sites, and ending with the harvest of surplus adult fish in hatchery harvest areas.

### **Regional Planning Teams (RPTs)**

The RPT process as structured works, and is doing what it was designed to do. Hatchery production requests are given scrutiny and frequently denied. Meetings are open and public, follow an established agenda and regulatory process, and are noticed sufficiently. As may be the case here, when the public does not agree with the outcomes of a process, the institution is immediately considered broken and non-transparent. I would argue that this is not the case, however there is room for structural improvement. Given these considerations, VFDA offers the following suggestions to improve public process:

Potential improvements to the RPT public input process

One significantly lacking component of the public process is public participation. Regional associations could enhance meeting structure to encourage comment opportunity prior to and during the meeting. Technological advances to encourage telephonic participation at reduced cost are also valuable tools to improve information flow. The dissemination of RPT actions would greatly improve public awareness with meeting minutes provided for BOF regional cycle meetings. An effective tool to increase

information flow to the public, through the BOF structure, would be to request a report from the area RPT Chairman at each regional cycle.

It has been many years since the Comprehensive Salmon Management Plan for PWS has been updated. This important document provides the outline for enhancement planning and production for not only commercial fisheries, but also sport, personal use and subsistence. The BOF could request that the department set a goal to review and update all Comprehensive Salmon Management Plans, more than ten years old, within the next five years. This process would include:

- A review of current and anticipated salmon production changes in each region
- Consideration of past and ongoing research of hatchery/wild interactions
- Evaluation of existing fisheries management strategies and stray mitigation
- Identification of regional stocks of concern

Additional improvements to the RPT regulatory process

VFDA feels that the RPT process, as designed and provided for is sufficient. The changes desired by the public can be easily effected administratively and a further commitment to improve the public process.

### **Enhancement Related Research**

Ocean carrying capacity and the consideration of global salmon abundance could be further developed for public understanding. The study of the greater North Pacific basin is not within the purview of ADF&G, but has been significantly researched on an international level by the North Pacific Anadromous Fish Commission. A sharing of this ongoing body of research, facilitated by the BOF and the NPAFC at future Hatchery Forums would improve the public's understanding of this vast issue.

### **Merits of including the Board's hatchery authorities as part of the Boards call for proposals**

The public has opportunity to provide proposals for consideration by the BOF for true allocative matters within the standard three year cycle. We believe strongly, that if the BOF commits to convening an annual hatchery forum, and the department continues to review RPT decisions and provide updates on hatchery operations, all involved will gain a better understanding and be provided opportunity to voice concerns. For many decades, the authority over hatchery permitting and production has resided with the commissioner. This has largely allowed the board to focus on allocative matters of hatchery stocks and provides production stability to the users of the resource and the enhancement community. It has been a very effective method of managing hatchery programs, using a sound application of scientific and precautionary principle. VFDA would hope that this remains the case.

VFDA has been responsibly producing pink and coho salmon for harvest in PWS fisheries for nearly forty years. Our enhancement programs contribute on average \$112 million in economic output to Alaska's economy and significant sport fishing opportunities for many. Thank you for the opportunity to advance suggestions for the agenda topics scheduled for the hatchery committee meeting. We look forward to working with the Board of Fisheries and ADFG to improve public understanding of these important fishery enhancement programs.

Sincerely



Mike H. Wells  
Executive Director

Submitted By  
Victor Jones  
Submitted On  
2/19/2019 2:59:19 PM  
Affiliation

Wild pink salmon are programmed to stray, it's an evolutionary strategy for survival of the species. We need studies on the stray rates of wild pink salmon to compare to hatchery stray rates.  
Hatchery pink salmon and wild pink salmon are all genetically the same. The brood stock for hatcheries originally came from wild streams. The only way to tell the difference between a hatchery pink and a wild-origin pink is by checking the otolith mark.

The hatcheries provide for all fisheries -- commercial, sport, subsistence, and personal use -- and benefit the entire state through raw fish tax and other economic impacts.

Submitted By  
Will Bousley  
Submitted On  
2/20/2019 8:06:17 AM  
Affiliation

Sitting here at my house in Ketchikan pondering the best way to contribute a comment for this discussion, I cannot resist to just state the facts. Here in 10 minutes, I must head away from home to rebuild a 36' sternpicker's deck and fish holds for a Gillnetter, for the 2019 season. The skipper is all in on this job, financially it is extremely expensive and he is counting on the hatchery production to aid him in his career and to pay the State of Alaska back. I also know, that if the hatchery produced salmon were cut back significantly, my seasons would not allow me to grow as a young adult with a ten year old daughter to provide for. The cost of living is too high to rely on anything less than what we as Alaskan fishermen are accustomed to in the last 20 years. This will be my 19th season this year and my success in this southeast gillnet fishery is largely due to the hatchery production, demand of our rich product, the state of Alaska's ability to finance people like me and my fellow Gillnetter who's boat I'm preparing for the upcoming season. All of these entities and communities are woven together and the demand on all of us is to continue our quest toward providing this rich product to our consumers. If there is some type of concern from sport fishermen in Alaska about how these enhanced salmon are affecting natural runs or their own fishery, these people need to show some proof and or finance a thorough investigation into how enhanced salmon is bad for our State. Fishing is a hard enough occupation, between facing the turbulent waters and weather, competition from other men and women, world markets, salmon survival, and the never ending fluctuations of salmon prices governed by our fish buyers and consumers, we have way too much adversity, now to implement cutting the source of our sustenance would likely put a majority of us, who are trying to build a life sold out to salmon, out of business.

Sincerely,

Will Bousley of Ketchikan



Submitted By  
Winston j Davies  
Submitted On  
2/14/2019 11:33:15 AM  
Affiliation  
  
Phone  
9073050112  
Email  
[wdavies@wpsd.us](mailto:wdavies@wpsd.us)  
Address  
P.O. Box 1695  
Wrangell, Alaska 99929

I am writing to support our hatchery programs. As a SE gillnetter, there would be very few boats fishing and able to make a living without hatchery reared salmon. I've seen Wrangell transform into a fishing town town once again where people can make their living chasing hatchery salmon and continue to reside in town, instead of having to move away seeking employment elsewhere. Wrangell now has a young, robust fleet ot of gillnetters due to hatchery programs. Most of the fleet tends to chase terminal run chums and don't focus on wild salmon, taking the pressure off of these fish. Please support our hatcheries.

Winston Davies



## YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

PO Box 2898, Palmer, Alaska 99645  
Tel: 907-272-3141 Toll free: 877-999-8566  
Fax: 907-272-3142 Email: [wayne@yukonsalmon.org](mailto:wayne@yukonsalmon.org)

### **Resolution: 2018-07 Large Salmon Hatcheries on the Yukon River**

**WHEREAS**, the Yukon River Drainage Fisheries Association (YRDFA) works on behalf of subsistence and commercial fishing families within the Alaskan and Canadian Yukon River drainage who depend on wild salmon for subsistence and commercial fisheries; and

**WHEREAS**, Alaska's hatcheries released over 1.5 billion salmon in 2017; and

**WHEREAS** total hatchery releases internationally including Alaska into the North Pacific are over 5 billion salmon annually; and

**WHEREAS**; these salmon intermingle in the North Pacific and compete with wild salmon and other specie populations for food; and

**WHEREAS**; the large number of hatchery fish in the ocean can limit the growth of wild stocks, particularly when ocean conditions are not productive for salmon; and

**WHEREAS**; the Alaska Board of Fisheries and the Alaska Department of Fish and Game have developed a Joint Protocol on Salmon Enhancement #2002-FB-215 and these increases in hatchery production have been in violation of the Joint Protocol on Salmon Enhancement;

**WHEREAS**; the 1998 Yukon River Comprehensive Salmon Plan (CSP) strongly opposed any large scale hatcheries on the Yukon River (Guiding Principle #6), preferring that conservative management and restoration in times of low abundance be the management approach rather than enhancement, and the current draft CSP Guiding Principles have removed this "Guidance".

**THEREFORE, BE IT RESOLVED** that YRDFA supports setting specific limits on hatchery production within Alaska and internationally, and specifically opposes large scale hatcheries on the Yukon River. Also that hatcheries follow the Joint Protocol that has been previously established.

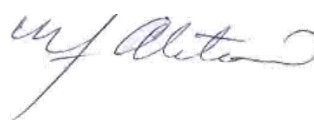
**COPIES** of this resolution will be sent to the Bering Sea Fishermen's Association, Alaska Department of Fish and Game, the Alaska Board of Fisheries, and Alaska Governor's Office.

**APPROVED** unanimously this 14<sup>th</sup> day of February 2018 by the Board members and delegates of YRDFA assembled at their Twenty-eighth Annual meeting held in Anchorage, Alaska.

Attest:



Victor Lord, YRDFA Co-Chair



William Alstrom, YRDFA Co-Chair

February 10, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Andrew Scudder, and I can be contacted at [Andrew.scudder1@gmail.com](mailto:Andrew.scudder1@gmail.com).

Hatcheries support my way of life and my business, and they are a large part of the coastal Alaska's economy.

Respectfully,

Andrew Scudder

February 17, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Beaver Nelson, and I can be contacted at [nukapoint43@gmail.com](mailto:nukapoint43@gmail.com).

I have been seining salmon in Cook Inlet and Prince William Sound since 1968. Before the development of PNP hatcheries in PWS, wild runs were erratic with total closures some years.

The hatcheries have provided the foundation for a prosperous and sustainable fishing economy for both sport and commercial in PWS. As salmon production has increased so have the populations of crab and shrimp with commercial harvests of tanner crab and spot prawns recently initiated. The PWS ecosystem appears healthy and thriving as hatchery production has ramped up.

The numbers of juvenile pink salmon in the Gulf of Alaska is dwarfed by the biomass of pollock, cod and herring. The pinks are as much prey for these species as competitors for the available food supply.

The king salmon populations of the Pacific coast from Cook Inlet south are not sustainable without hatchery enhancement. Why there has been no effort to save the Kenai River hogs through enhancement while we still have good habitat available is beyond me.

Respectfully,

Beaver Nelson

February 15, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Bernard Culbertson, and I can be contacted at [myninkasi@gmail.com](mailto:myninkasi@gmail.com).

In 1972 there were 57,090 Pink salmon caught in Prince William Sound and Copper River Flats by Purse Seine, Gillnet, and Setnet. This comes out to about 81 fish for the approximately 700 fishing vessel. In 1974 there were 458,619 Pink Salmon caught in PWS and Copper River flats by about the same 700 vessels. This is about 700 fish per fishing vessel. It was at this time that the PWS seiners realized they needed to do something to improve their lot and even out the bell curve. Purse Seiners then applied for and received a permit for a Pink Salmon hatchery in PWS. Fishermen spent their own time and energy putting together and building an old cannery so they could potentially have a better life. I made \$1.200 dollars my first year fishing in PWS. The difference between the State overall income by household now compared to the 70's is 100 times that. The ability to finance homes and families, to continue the fishing, which has been the backbone of Alaska long before Oil and Tourism, is why we continue to spend hundreds of thousands of dollars to be able to contribute to the welfare of the state we love. The hatcheries have evened out the bell curve and made it so we can make a living and stay in Alaska and contribute to the overall economy of the state.

Respectfully,

Bernard Culbertson

February 15, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Bill Connor, and I can be contacted at [crfbc@aol.com](mailto:crfbc@aol.com).

I support all salmon hatcheries in Alaska. Prior to the salmon hatcheries in Southeast, my season was June and first part of July. With the advent of the salmon hatcheries I have been able to spread my cost and season over a 3 month period instead of one and a half months. This has helped my operation's success and has allowed me to employ 4 crew members with a living wage. With the extended fishing days, I am able to support local businesses for a longer period of time and this has helped Petersburg remain a viable fishing community.

If there is any reduction in hatchery releases, it will be born by the coastal communities. Fishing businesses and support businesses will feel the impact and populations in these communities will begin to shrink as the fishing businesses is constrained by fewer fishing opportunities.

Respectfully,

Bill Connor

February 16, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Christopher Johnson, and I can be contacted at [Chriscjtina@gmail.com](mailto:Chriscjtina@gmail.com).

Eighty percent of my gross income for the last forty years has come from chum hatcheries. I am sure those numbers are similar for most Southeast Alaska fisherman. Wrangell, in particular, survives on commercial salmon fishing. Most hatcheries are in areas of very little mixing with wild stock salmon. In the last forty years the whale population has grown out of control and the fry have been a major source of food for them. One thing that has remained relatively stable has been the hatcheries output and returns. Fish and Game has done a good job managing for wild stock first and not on hatchery fish. Any line of thinking to reduce hatchery output would be devastating to fisherman, cannery workers and owners, city tax revenue, ports and harbors, and so many more groups and community projects.

Respectfully,

Christopher Johnson



February 8, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Dalton Bergman and I can be contacted at [dalton\\_bergman@hotmail.com](mailto:dalton_bergman@hotmail.com).

Alaskan hatcheries are extremely vital fo my ability to provide a sustainable and quality way of life for my family. Being a Sitka based gillnetter my only home port fishing opportunity is on hatchery produced salmon. Without Hatchery production my family's primary income would be lost. I support the well managed hatchery facilities throughout the state.

Respectfully,

Dalton Bergman

February 15, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is David Blake, and I can be contacted at [dblakej40@aol.com](mailto:dblakej40@aol.com).

I appreciate the opportunity to address the Board in this forum.

I am sure the Board of Fisheries have seen and are well aware of the economic impact of the Alaska salmon hatchery programs across the state. That is well documented by many including well respected research conducted by the McDowell Group and its many years of contributions and reporting on the effects of what the program brings to all of Alaska. This is a renewable resource that has a positive impact on not only the direct users -- sport, personal, subsistence and commercial -- but also the positive impact on most of Alaska, especially rural communities. This is both an economic and sustainable way of living within the rural areas across the state. I support keeping the hatchery system in place for the good of all Alaska.

Respectfully,

David Blake

February 9, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is David Kleoser, and I can be contacted at [boondockdave@live.com](mailto:boondockdave@live.com).

I am in favor of hatcheries in Alaska. They have provided hundreds of millions of direct benefit to commercial fishermen, and sports fishermen while easing harvests on wild stocks in times of low abundance.

The board of fish commitment to hatcheries is vital to stability in the commercial salmon fisheries.

I urge for continued supporting.

Respectfully,

David Kleoser

February 17, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

Our names are Gig and Julie, and we can be contacted at [julieanndecker@gmail.com](mailto:julieanndecker@gmail.com).

The Board has reviewed hatchery proposals in both July and October 2018 and will review and discussion of ADFG's hatchery program at this March 8 Hatchery Committee Meeting. Hopefully, the Board is more aware of the hatchery program and research as a result of these meetings and will move to an annual schedule to receive an overview of hatchery issues. I also strongly recommend that the hatchery-wild interaction study be able to conclude, so that those results will inform the next phase of related research.

Respectfully,

Gig and Julie Decker

February 7, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Jamin Morris, and I can be contacted at [morrisjamin@yahoo.com](mailto:morrisjamin@yahoo.com).

My family of 6 is totally reliant on hatchery enhanced fisheries in PWS. We support Alaska-based businesses for our fishing needs and for our day to day life in Homer.

These hatchery enhanced fish are “Wild Alaskan Salmon” that are given a boost for optimum survival; they are not “Frankenfish”. Migration and “straying” is the reason these fish are found all over Alaska in the first place. Let the fish do their thing, it has worked for thousands of years. As long as they are not genetically modified they are “Wild Alaskan Salmon”, let them swim and spawn wherever they want.

Respectfully,

Jamin Morris

February 17, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Jessie Nelson, and I can be contacted at [nukapointfish@gmail.com](mailto:nukapointfish@gmail.com).

We are a fishing family of over 50 years. Hatchery production is a huge part of our income and our community's income. In Homer, PWSAC alone contributed \$21 million in 2017. These fish touch every business and every person.

Why a group of people want to harm the social fabric and the economic fabric of our area is beyond reason.

The best thing the Board can do to help our communities is to leave the hatcheries alone and not harm the people.

Respectfully,

Jessie Nelson

February 9, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is John Skeele, and I can be contacted at [Johnskeele@yahoo.com](mailto:Johnskeele@yahoo.com).

As a Sitka based se drift gill netter, I depend heavily on enhanced salmon. By heavily I mean that my salmon catch in most years is almost 100% NSRAA hatchery raised chum, coho, and king salmon. These fish return to our local waters in numbers unheard of 30 years ago, and create millions of dollars of economic activity just in ex vessel value alone.

Straying of hatchery stock into wild salmon spawning streams has and is being studied, but one issue that concerns me is that robust hatchery runs hide declines in wild stocks that are caused directly by habitat degradation, namely clear cut logging, currently, and hard rock mining(future).

I urge for continued supporting.

Respectfully,

John Skeele

February 14, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Jordan Stover, and I can be contacted at [Acehunterstover@gmail.com](mailto:Acehunterstover@gmail.com).

Alaska hatcheries not only save salmon runs but also Alaskans. From the commercial to sport and subsistence, we all use and need ak hatcheries. Completely support our enhancement programs and hope all our elected officials and Alaska as a whole do, too.

Respectfully,

Jordan Stover



February 8, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Karsten Wood, and I can be contacted at [karstenwood@hotmail.com](mailto:karstenwood@hotmail.com).

Hatcheries have been a huge success story in Alaska creating opportunity for all sorts of people, not just commercial fisherman. We all benefit from them directly or indirectly.

Respectfully,

Karsten Wood

February 15, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Megan Corazza, and I can be contacted at [Megancorazza@hotmail.com](mailto:Megancorazza@hotmail.com).

I have run my purse seine operation in Prince William Sound for twenty years. It has allowed me to support my family so that I can be a stay at home Mom in the winter and volunteer as a ski coach for the local high school. During these years, I served on the BOD for PWSAC and participated in hatchery politics at a statewide level. Hatcheries in PWS have contributed greatly to the economic viability of our fishery, and to the steady permit value. The hatcheries are being run with high environmental integrity and producing a run which allows reduced commercial fishing pressure on the wild stocks during poor years. From wild stock return numbers that are often at record highs, it is apparent that the hatchery stocks are not weakening the wild stocks. Hatcheries are very important for the three seine operations in my family. Please continue to support them.

Respectfully,

Megan Corazza

February 15, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Nicholas Crump, and I can be contacted at [nicholaswcrump@gmail.com](mailto:nicholaswcrump@gmail.com)

Unfortunately, there is an alarming amount of anti-hatchery sentiment growing within the sports fishing community, which is being fueled by misinformation and propaganda created by the Kenai River Sportsfishing Association. As Kenai River and Cook Inlet user groups battle for allocation of their local resources, please keep in mind their struggle should not spill over onto other separate areas such as Prince William Sound. The political problems associated with these various user groups battling for allocation rights within the Kenai River district should be addressed locally. Increased local research, different approaches to localized management, perhaps even limiting the amount of pressure put on those stocks by local fishermen could be in order. When sports fishermen are allowed to wade around and disturb spawning beds that is a problem. Also, when a spawning salmon is caught and then released its likelihood of survival and ability to successfully spawn have decreased dramatically. I know there are many small and large businesses invested in both the commercial and tourism industries who depend on strong salmon returns to the Cook Inlet and Kenai River, but they need to put their differences aside and do what's right for their region. Attempting to bring other surrounding areas who's resources and allocation have been managed carefully and successfully into their localized debate is unnecessary and frivolous. I believe it is possibly meant to be used as a distraction from having to address their local issues and make sacrifices locally by blaming their shortfalls on a ridiculous straw man argument. Thank you for your consideration and good luck making the right decision.

Respectfully,

Nicholas Crump

February 13, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Richard King, and I can be contacted at [alaska@aloha.net](mailto:alaska@aloha.net).

My family and I have earned our living in the commercial fisheries in Upper Cook Inlet and in the Prince William Sound seine fishery for 44 years, and we are very concerned with the general health and productivity of Alaska's salmon hatcheries. As you move through your discussions regarding our hatchery programs, please be aware of how important their production is to the three generations of fishers in my family. Thanks for all that you do for Alaska and our fisheries.

Respectfully,

Richard King

February 14, 2019

Alaska Department of Fish & Game  
ADF&G, Boards Support Section  
PO Box 115526  
Juneau AK 99811

Dear Members of the Board of Fish:

My name is Wayne Ackerlund, and I can be contacted at [skagitguide1@gmail.com](mailto:skagitguide1@gmail.com).

I have been a commercial Fisherman in Prince William Sound Since 1994 and a captain since 1999. The hatchery production in these waters are my livelihood, as well as the sole support for my family. Any cuts to the hatchery production will have an immediate and substantial financial impact to my family. It will also devalue the considerable financial investment I have in this fishery.

Respectfully,

Wayne Ackerlund