

UNITED SOUTHEAST ALASKA GILLNETTERS

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October 9, 2018

John Jensen, Chair
Alaska Board of Fisheries, Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Submitted via online form.

Dear Chairman Jensen and Board of Fisheries members:

The United Southeast Alaska Gillnetters are opposed to ACR 1

First, we have to question the board's legal authority to revoke a permit that has been issued and vetted through a public process. The proponents of this ACR are asking for that, which appears to be in direct conflict with the legal opinion rendered in 1997. A legal opinion is just an opinion, of course, but the Board of Fish is not a court of law, and the board should be careful to stay within the bounds of their authority until it is clearly defined as to how far their authority extends. We fail to understand the allocative aspect of this question, and in our minds, this isn't within the board's purview.

This is the third time this particular issue has been heard by the board. Twice, the board failed to determine an emergency. Our assumption is that it met criteria for an Agenda Change Request given that the 2018 data from the streams in Cook Inlet and the percentage of strayed hatchery fish would be available for review. In January in Sitka, the board elected to review this issue later, as more data became available. Our interpretation is that the very data that makes this ACR relevant was going to be reviewed and looked at anyway. Two emergency petitions and an ACR submitted by the proponents seem abusive of the board process when the board had already decided to take this up. While we do understand dire circumstances require urgency, we see this as blatant sensationalism.

We respectfully ask the board to consider the best available science in their analysis of this issue regarding enhanced salmon fitness, straying, and genetic diversity. We would also ask that the

precautionary approach in permitting projects by the Department of Fish and Game be noted. Despite the accusations of harm caused by enhanced fish to stream-born, we have seen no empirical evidence to suggest that any has been done. While some may point to recent run failures as being caused by hatchery production, it is important to note that historically there were run failures before there was any major hatchery production. In fact, the need for hatchery production was realized because of poor salmon returns, to enhance production and minimize peaks and valleys that are common in the salmon industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', with a stylized, cursive flourish at the end.

Max Worhatch
Executive Director