

**PROPOSAL 22**  
**PUBLIC TESTIMONY – TIMOTHY J. MOORE**

To Chairman Moriskey and other Board of Fish Members

I am Timothy Moore, a 30- year commercial fishermen and sport fishermen. I am writing to oppose Proposal 22, which limits the number of salmon harvested by Regional Private Non-Profit (PNP) hatcheries for the purpose of Cost recovery for revenue purposes.

The author infers that Regional PNP hatcheries are cost recovering certain species of salmon arbitrarily and the remedy suggested is for the Board of Fish (BOF) to establish caps and or limits to control the author's assertion of excessive cost recovery.

This statement is false for the following reasons:

- 1) Cost recovery of "certain species of salmon" is absolutely not "arbitrary". For the most part, all cost recovery is executed in the 'Special Harvest Area' and 'Terminal Harvest Area' of individual hatcheries. The only exception to this is when ADF&G issues an Emergency Order enlarging the cost recovery area. All cost recovery efforts are exclusively targeted on specific hatchery stocks.
- 2) There is no "Excessive Cost Recovery". Annually the Regional PNP hatchery Boards meet to establish yearly budgets and revenue plans that include cost recovery to meet their fiscal needs. The review and vetting of these budgets are responsibly carried out by their respective Board of Directors. The assertion of "excessive cost recovery" is false. Cost Recovery is limited to the revenue needed to cover the budgeted costs associated with hatchery operations.

Furthermore, the following points outline the broad range of hatchery oversight and demonstrate how PNP hatcheries are purposefully and responsibly managed to ensure the sustainability of wild salmon while providing salmon resources for all stakeholders in their respective regions.

- The Legislature spelled out management responsibility of hatcheries between the Commissioner of ADFG and the BOF. Considering this the BOF has not chosen to consider specific regulations that manage hatcheries other than to allocate harvests of hatchery fish within mixed stock fisheries, establish areas and or lines for hatchery harvesting (SHA's and THA's) or to approve donor stocks with egg numbers for hatchery production.
- Regional PNP hatcheries are governed by a Board made up of all users of salmon in the area they operate. This includes commercial fishermen, sport fishermen, subsistence fishermen, local municipality reps, native reps, and general representation from the local science community. The makeup of these boards was mandated by statute when the Legislature created the regional PNP hatchery Act.

- The Commissioner of Fish and Game has an ex-officio seat on some of the boards of the Regional hatchery associations. The commissioner designates his representative which then participates in board meetings that bolsters the Dept.'s oversight of hatchery operations.
- The Legislature created the Regional PNP Hatchery system under statute. It carefully spelled out the State's management of this responsibility with several key elements. a. The Commissioner of the Alaska Dept. of Fish and Game (ADFG) is to oversee the management of Regional PNP hatcheries. b. The Regional planning teams annually oversee hatchery management plans and carefully look at potential changes in hatchery production and all operations of the hatcheries. Fish and Game has a member majority on the Regional Planning Team. All motions on the Regional planning team come to the Commissioner as recommendations thereby keeping hatchery operations and production plans under the direct management of the State.

In conclusion, the State of Alaska's robust management of PNP hatcheries has been highly successful over the past 40 years. Hatcheries are carefully managed, their budgets responsibly reviewed and cost recovery, under ADF&G oversight, is limited to approved budgetary needs.

I respectfully request that Proposal 22 be rejected on the grounds that it is based on false information and the Legislature has provided that any amendments to hatchery cost recovery be determined by ADF&G through the Commissioner.

Sincerely,

Timothy Moore  
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