

My name is Dennis Zadra and I have been a commercial fisherman out of Cordova for 34 years. I also operate my own guiding business which I have done for 27 years. I am the Co-Chair of the Copper River /PWS AC and I sit on the South Central RAC. I am a board Member of Cordova District Fishermen United and I am also a member of the Alaska Professional Hunter's Association.

I am here to testify as a representative of our AC against Proposal 43 as our hatchery system is critical to the commercial fishing industry across the State. I am also here to testify against a Board Generated Proposal limiting the federal halibut fishery and others in state waters.

To address Proposal 43, there is no evidence that reducing hatchery production, especially by such drastic measures, would create a better environment for Wild Stocks. It is only conjecture. The hatchery program has been a huge benefit for the State, and sport and charter operators enjoy it's benefits as well as the commercial fleet. The first hatchery operations in Alaska were started in 1891, and our current hatchery model has been producing salmon for 52 years. These proposals have come before the Board many times before and have not been able to pass muster. The Board does not have the authority to impose such drastic reduction on a program that is highly regulated with much opportunity for Public input. The main proponent of this proposal continues to cite a meeting that happened 23 years ago as justification for this drastic reduction. The wild stock pink salmon runs in PWS of 2015, 2017, and 2021 were the 3 highest in the last 22 years and occurred at the current level of hatchery production. This data from ADF&G does not support the assertion that hatchery production is detrimental to wild stock production.

Speaking of public input, I would now like to discuss the request from the Commissioner for this Board to pass a board generated proposal (BGP) to give him authority to close any state waters to commercial longline fishing. This proposal does not meet the criteria for a BGP and is an attempt to step around regular board process. From the Board's own manual, "Both boards are able to develop and schedule their own regulatory proposals. When the board develop proposals, they follow a joint policy that calls for consideration of criteria that serves the best public interest, requires urgent attention, and provides for reasonable and adequate opportunity for public comment."

ADF&G says they have grave concerns over rockfish stocks in Prince William Sound, yet they have no data to support their claim. CDFU has repeatedly asked the Department to show us their numbers and survey reports and they have not provided us with anything recent and anything that would stand up to scientific scrutiny. We were able to locate the sport fishing survey data for 2022 which shows the reported harvest of PWS rockfish of 99,576 fish. Applying a conservative weight of 5 lbs per fish, that correlates to a weight of almost 500,000 lbs which is more than 3 times the commercial GHL. The GHL is based on historical harvest from 1992. We have continued to point out that the most reliable survey of rockfish abundance is the halibut commission survey's bycatch numbers and those are showing an increase in rockfish abundance in area 3A.

If there is a real conservation concern for rockfish (which the department first needs to demonstrate to us), then the fishing industry is ready to work with the department to find

solutions. We have a lot of ideas and there's a lot we can do together. However, the proposal to grant the department the power to close any state waters to the commercial halibut fishery is unacceptable to us and of questionable legality.

Our small boat longline fleet in Cordova urgently depends on the state waters of Prince William Sound to be able to safely and efficiently harvest their halibut. Closing large areas of Prince William Sound would force those vessels out onto the Gulf of Alaska, and possibly endanger lives. Also, the federal Halibut Act does not delegate any management authority to the state over the halibut fishery. While the department has been careful to word the recent closure as a closure to "gear types", it is a de facto closure to directed halibut fishing and therefore likely to be challenged in court if made permanent.

I'd like to reiterate that if there is a real conservation concern for rockfish, that the department can back up with real numbers, then we are ready to work with the department to find solutions.

We have a unique opportunity in Alaska with our Board Process where any individual can present, testify and be part of the entire regulation making process. It is imperative that that all user groups have the opportunity to voice their concerns and it is incumbent on the Board to deliberate considering this public input.

This proposal does not meet the criteria for a BGP because pushing something as controversial as this into the Kodiak meeting in early January will completely sidestep this wonderful public process.

If the department is truly so worried about rockfish in Prince William Sound then they can submit another emergency petition when perhaps 80% of the GHL is caught in 2024. In the meantime, we can actually work together to find solutions. Drastic and permanent changes to the state law, however, absolutely need to be brought in at a regular board cycle meeting.

Thank you for taking my testimony.