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**ALASKA BOARD OF FISHERIES**  
**Public Comments on Proposals 1-4 and 43**  
**RENUMBERED**  
**From the Lower Cook Inlet Finfish Meeting**

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## Alaska Trollers Association



November 11, 2023

Board of Fisheries  
State of Alaska  
c/o Board Support



Re: Comments on Proposals 34, 35, 36, 41, 43

Dear Board of Fisheries Members:

As you are aware, the Alaska Trollers Association (ATA) represents the power trollers and hand trollers who fish throughout the waters of Southeast Alaska, up to and including Yakutat. We represent these men and women who compose a fishery which supports thousands of Southeast Alaska rural resident jobs. Furthermore, according to the Central Council of the Tlingit and Haida Indian Tribes of Alaska 30% of trollers have tribal membership.

Our fishery has experienced dramatic declines over the last century, particularly through the reductions mandated by implementation of the Pacific Salmon Treaty (PST). As you are probably aware, hatchery fish are not counted towards our Alaska's PST allocation. We stand firmly in support of our hatcheries and have received significant benefit from them.

Accordingly, we oppose Proposals 34, 35, 36, 41, 43 which are before you at this meeting and ask you reject all of these in support of our healthy hatchery infrastructure in Southeast.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Daugherty".

Amy Daugherty  
Executive Director



**Submitted by:** Jeff Bailey

**Community of Residence:** Cordova

**Comment:**

Proposal 43.

Alaska's pristine waters and high nutrient content make it a perfect environment to raise salmon. Hatcheries located throughout Alaska contribute to the economies of many coastal communities through raw fish tax revenue. This economic contribution is vital to our coastal communities and the people who live there. Without our hatchery programs we would see a dramatic decline in tax revenue to the state and our coastal communities. The continued efforts by commercial sport fishing organizations to limit or eliminate all Alaska salmon hatcheries is unrealistic and reckless. Alaska's king salmon decline is a direct result of sport fish pressure in our spawning streams not hatchery pinks maturing in the open waters of the Pacific Ocean. It's time for the State of Alaska to treat king salmon as big game animals. All sport caught king salmon should be permitted through a state wide drawing system similar to moose, bison, bear and other big game animals. Report of harvest should be required within 5 to 7 days of harvest. Not a voluntary mail in sometime the following year as is currently requested by ADF&G for management of harvest guidelines. The current system doesn't allow for in season management based on real time sport harvest numbers.

Proposal 43: Oppose

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November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm from Juneau and am part of the commercial and sport fisheries, as well as seafood processing and retail. I strongly oppose Proposal 43. Alaska's private, non-profit hatchery program is an excellent model that benefits commercial fishermen, sport fishermen, subsistence fishermen and is already managed very well with the oversight of ADF&G.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a



careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Hank Baumgart

[REDACTED]  
Juneau, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in all aspects of fisheries, from commercial, sport, and subsistence fishing to seafood processing. I stand strongly opposed to Proposal 43. I support our Hatchery programs.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

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**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Jeff Berger



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I have participated in commercial gillnet fishery in PWS since 1983. Hatchery production has maintained stability to a fishery that before hatchery production was very unreliable. PWSAC and VFDA have provided stable fisheries and also large continuing payrolls to many Alaska towns and Villages. The hatcheries have provided continued reliable resources for not only the commercial fishers, but also sport fishers, processors and the State of Alaska. I do not support reducing production of any of the hatcheries in AK weather managed by State or Private Non Profits. These hatcheries are too important to the well-being of State and local economies in both commercial and sport connections. Please vote to keep hatchery production levels at present levels into the future for all.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.

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Sincerely,  
David Blake



Cordova, Alaska

November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm part of the commercial, sport, and subsistence fisheries in Petersburg, Alaska. I strongly oppose Proposal 43. The attack on Alaska hatcheries by a very small group of people is very concerning to me as an Alaska resident and commercial fisherman. Most concerning is the fact that these attacks are not based on facts or science and are now attempting to weaponize the Board of Fish process.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Jared Bright

[REDACTED]

Petersburg, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to commercial, sport, subsistence, and public use fisheries in Cordova, Alaska. I strongly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

Sincerely,  
Kacey Brown

[Redacted Signature]

Cordova, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial, sport, subsistence, and public use fisheries in Anchorage and Cordova. I stand strongly against Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,

James Burton

[Redacted Signature]

Anchorage/Cordova, Alaska



James R. Burton  
F/V Cricket



November 13th, 2023

John Wood, Chair  
Alaska Board of Fisheries



RE: Public Comments for LCI Proposals

Dear Mr. Chair and Board of Fisheries Members, I am a third generation Fisherman from Cordova, Alaska. I have fished for herring, salmon, crab and ground fish from Southeast Alaska to the Bering Sea for the majority of my life. I have been a sport and subsistence user for fish and game resources in Alaska for all of my life. I have served as a Fish and Wildlife Aide and an Alaska State Trooper in the Division of Fish and Wildlife Protection with duty stations in Kodiak, Fairbanks, Sitka and Anchorage. I served the community of Cordova, seated for two terms on Cordova City Council in addition to other various roles including the Harbor Commission and Health Services Board.

I am married and the father of four children. My oldest daughter has been fishing with me for 5 years as a full time crewman, and participates in the multiple fisheries. She is an up and coming 4th generation fisherman, recently purchasing her first permit. Commercial Fishing is critical to my family, not only as income, but a skill and tradition to be passed down. The idea that the commercial fishing industry would be willing to sacrifice the future of our fisheries for a fish ticket today couldn't be further from the truth. We are not only fishermen, but stewards of the resource with the goal to pass this industry down to the next generation. I have every intention to introduce the rest of my children to this life in hopes that they will someday have an opportunity to feed the world.

I urge you to reject Proposals 43, 59, and all similarly worded proposals and offer the following personal comments -

Proposal 43 (and 59 - and likely others for each upcoming regulatory salmon area BOF meeting cycle) essentially states that in 2000, an agreement was made to reduce hatchery egg takes for pink salmon to 25% of the year 2000 numbers.

For starters, the language of the proposal is flawed from the get go. The proposal states: ***Reduce hatchery production to 25% of the year 2000 production as promised in 2000.***

Later, the language in the proposal states: ***The hatchery management met with the Governor and proffered that if the Board would not take up the proposal they would reduce their production by 25%.***

Which is it? Reduce Hatchery production in Alaska to 25% of the year 2000 egg take numbers, or reduce the 2000 egg take numbers by 25%. That's a MASSIVE difference.

Further, even if the Board of Fisheries has the authority to alter or regulate egg take numbers, it circumvents a larger process by which these numbers are arrived at - utilizing the best available science. This proposal suggests that the Board, and every stakeholder in the industry, simply agree to this reduction that is the result of an advisory committee proposal in a community with 32 residents (in the year 2000). Essentially 0.005 percent of the Alaska population of 627,963 at the time. Not that every Alaskan doesn't matter, they most certainly do, but I would suggest that the 2000 proposal was not indicative of the general wishes of Alaska - and it is most certainly outdated 23 years later. You, and WE should not be beholden to this argument generations of Alaskans later.

Having said that, proposal 43 suggests that hatchery-produced salmon compete with wild salmon for food and that as a result, ocean productivity is low. If this is true, I ask how have we seen - in the last ten years - some of the largest sockeye and pink salmon returns (sometimes simultaneously) in Alaska? How do we explain the last handful of record-breaking Bristol Bay returns that occurred at the same time that North Pacific aquaculture productions were at their current and probably record levels if you consider Russia and Asian hatchery production? Perhaps Bristol Bay sees record sockeye returns because they don't have sport fishermen stomping in and around their spawning grounds to the extent that the Chitina, Copper, Mat-Su and Kenai region do?

Continuing that thought, Russia produces pink salmon at a rate that is greater than 2:1 for Alaska. It's unclear what the split is between wild production and hatchery, but the information I have suggests it's at least 50% hatchery production. What number of eggs that takes and how many fry are released into the North Pacific Ocean I don't think we'll ever know. Which brings me to my next question for the Board:

If we accept that proposal 43 is completely factual, and we accept the correlation = causation argument regarding hatchery vs. wild salmon, food supply, etc... then: Why is the onus placed on Alaska hatcheries to bear the entire burden of the North Pacific? Salmon fry release into the ocean is in the *billions* yet this proposal takes zero consideration into the fact that this is a multinational industry, of which the State of Alaska is honestly *at least* a very distant second - to other countries over which the BOF has no control or jurisdiction.

Those arguments aside, I do not see any evidence presented in Proposal 43 to effectively quantify what benefit wild salmon would see, given a significant reduction in hatchery salmon. The lack of quantifiable, defensible data is arguably the biggest concern with this proposal. Rather than rooted in science, it essentially says the BOF needs to modify hatchery salmon production because "a long time ago those guys said they would and they didn't." As a parent, the argument feels a lot like one I'd hear from my preschooler and not something I would use to



determine the economic fallout of such a decision on the entire State of Alaska and its fishing industry.

Thank you for your time and dedication to this process.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Burton".

James R. Burton



# Cook Inlet Recreational Fishermen

c/o Pete Zimmerman, Spokesman • [REDACTED] • [REDACTED]  
[REDACTED]

October 29, 2023

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
C/O Board Support Section

[REDACTED]  
[REDACTED]

Attention: Art Nelson, Executive Director

Regarding: Upper Cook Inlet Summer, Lower Cook Inlet Summer, Winter and North Gulf Coast  
Fishery Proposals - Comments

via e-mail: [boardoffisheries.adfg.alaska.gov](http://boardoffisheries.adfg.alaska.gov)

Dear Art and Members of the Board of Fisheries:

Cook Inlet Recreational Fishermen (CIRF) is a grassroots sportfishing association formed to provide Alaska anglers a unified voice in management actions that affect the saltwater Chinook (king) salmon sport fishery in Cook Inlet and the North Gulf Coast.

We strongly support application of the best scientific information available to inform conservation and management decisions. As a result, we present you with the following information and comments concerning Proposals 1, 6, 9, 10 and 12 in advance of the Board meetings scheduled for November 28 to December 1, 2023 (Lower Cook Inlet) and February 23 to March 7, 2024 (Upper Cook Inlet). Each of these proposals pertains to Saltwater King Salmon and is of great concern.

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***PROPOSAL 1 - Upper Cook Inlet Summer Fishery***  
***5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan***

*Amend the Upper Cook Inlet Summer Salt Water King Salmon Sport Fishery Management Plan, as follows (This proposal will be heard and public testimony will be taken at both the LCI and UCI meetings and deliberated at the UCI meeting):*

*5 AAC 58.055 is amended to read:*

*(g) if the Anchor River preseason forecast or inseason projection is less than the lower end of the sustainable escapement goal of 3,200 - 6,400 king salmon, the upper Cook Inlet salt waters north of the latitude of Bluff Point (59° 40.00' N. lat.) within a mile of shore shall be closed to the retention of king salmon from May 15 to July 15; if the Kenai River is closed as specified in 5 AAC 57.160, the upper Cook Inlet salt waters north of the latitude of Bluff Point (59 40) shall be closed to the taking of king salmon from May 15 to July 15; (h) if the Kenai River is closed to the taking of king salmon as specified in 5 AAC 21.359, the upper Cook Inlet salt waters north of the latitude of Bluff Point shall be closed to the taking of king salmon from June 20 through August 15.*

**COMMENTS:** The late run Kenai kings are generally in the river by July 31. It is possible there may be a few fish north of Deep Creek, however, the chances of hooking one of these fish is extremely low. By closing the fishery inside one mile from shore north of Bluff Point beginning July 31, the chance of interception is eliminated.



**PROPOSAL 6 - Lower Cook Inlet Summer Fishery  
5 AAC 58.XXX. New Section.**

Create a management plan and establish a guideline harvest level for the lower Cook Inlet summer salt water king salmon sport fishery as follows:

- a) The goal of this management plan is to stabilize the sport harvest of king salmon in the mixed stock salt water fishery in lower Cook Inlet from April 1 through August 31;
- b) The lower Cook Inlet salt waters include all salt water south of the latitude of Bluff Point at 59 40.00'N. lat excluding shore-based harvest;
- c) the bag and possession limit is 2 king salmon any size;
- d) the annual limit and harvest record specified in 5 AAC 58.022 applies to king salmon 20" or greater harvested in this fishery;
- e) the guideline harvest level is X,XXX king salmon

**COMMENTS:** The Board of Fisheries needs to address the inequities and inconsistencies between Alaska resident and nonresident recreational retention of king salmon.

There is a huge discrepancy in management policies of lower Cook Inlet recreational fisheries verses the rest of the state. For decades Alaska residents fishing in Southeast (SE) have had priority retaining king salmon over nonresidents. As the SE salmon charter fleet grew, non-residents began harvesting the majority of available king salmon. It was determined by the Board of fisheries that Alaska residents fishing in SE Alaska would receive an increased allotment of king salmon over non-resident fisherman. Last season for example the resident bag limit was 2 kings per day, no annual limit. Nonresident bag limit was 1 king per day with an annual limit of 3 kings.

Resident recreational fisherman in Cook Inlet need to have priority over nonresident fisherman regarding retention of king salmon. These fish provide food for our families. We are allowed to keep a total 5 kings during the 5-month summer season. The Homer charter fleet caters to primarily non-residents. Most boats carry 6 passengers (six packs) and larger boats accommodate 12 or more. One six pack charter boat can keep 12 king salmon per day. A 12 pack can retain 24 kings per day. Alaska residents are allowed 5 fish for the entire summer season. The board needs to establish a Cook Inlet recreational king salmon management plan which allows Alaska residents a harvest priority over nonresidents. A conservative summer season limit for Alaska residents south of Bluff Point would be 1 king/day over 20", no annual limit. (At the very minimum 10 kings for the summer season for Alaska residents only).

Note: ADF&G's *Lower Cook Inlet Management Area Saltwater Charter Logbook, Table 4. 2006-2022* states the Lower Cook Inlet average annual charter boat catch as follows:

Years	Average Catch
2006 - 2013	2,858 King Salmon
2014 - 2018	6,871 King Salmon
2019 - 2022	9,224 King Salmon
2022 Only	11,224 King Salmon

Posted on the ADF&G website is the 'Commissioner's Welcome' which states... *'Alaska's fish and game resources belong to Alaskan's.* Furthermore, Commissioner Douglas Vincent-Lang states... *'The Department will continue to put the needs of our citizens first.'*

Alaska residents fishing in Cook Inlet waters have no priority over non-residents. Homers charter fleet is taking a disproportionate share of highly migratory, Lower Cook Inlet mixed-stock king salmon. We ask the board to honor the Commissioners pledge and establish a Cook Inlet recreational king salmon management plan similar to that of SE Alaska, allowing Cook Inlet residents a prioritized share of Cook Inlet king salmon over non-residents.

**PROPOSAL 9 - Winter Fishery****5 AAC 58.060. Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan.**

Review management options in the Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan as follows:

5 AAC 58.060(b) is amended to read:

- (1) The guideline harvest level is [4,500] X,XXX king salmon;
- (2) The sport fish harvest will be estimated annually by the department's statewide harvest survey;
- (3) The bag and possession limit for king salmon is [TWO] X fish;
- (4) The annual limit and harvest record specified in 5 AAC 58.022 does [NOT] apply.

**COMMENTS:** With the exception of (2019), during the past 7 years the average number of kings exceeding the Guideline Harvest Level (GHL) was 568 fish, or 12.6% above the GHL. A logical means to maintain the current GHL would be to adopt a 20-inch minimum size limit for winter kings. This would reduce the take by over 20% and give juvenile kings under 5 pounds a chance to mature.

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**PROPOSAL 10 - Winter Fishery****5 AAC 58.060. Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan.**

Modify king salmon limits in the Cook Inlet Winter Salt Water King Salmon Sport Fishery as follows:

5 AAC 58.060. Cook Inlet Winter Saltwater King Salmon Sport Fishery Management Plan.

- a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon in the salt waters of Cook Inlet during the winter, which occurs from September 1 through March 31.
- b) In the winter salt water king salmon sport fishery in Cook Inlet
  - 1) the guideline harvest level is 4,500 king salmon;
  - 2) the sport harvest will be estimated annually by the department's statewide harvest survey;
  - 3) [THE BAG AND POSSESSION LIMIT FOR KING SALMON IS TWO FISH] Limit of 2 per day 4 in Possession with an annual harvest limit of 10 King Salmon per person from September 1st to March 31st;
  - 4) the annual limit and harvest record specified in 5 AAC 58.022 does not apply.
- c) For the purposes of this section, Cook Inlet consists of the salt waters of Cook Inlet west of the longitude of Gore Point at 150° 57.85' W. long., and north of the latitude of Cape Douglas at 58° 51.10' N. lat., including all of Kachemak Bay.

**COMMENTS:** The most recent ADF&G four-year genetic king salmon study proved conclusively that 99% of winter king salmon caught South of Bluff Point are non-Cook Inlet fish. The kings caught recreationally during the winter fishery have no impact on Cook Inlet wild stocks. Furthermore, Cook Inlet fishermen are allowed only 5 kings during the entire 5-month summer season. The winter months are our only opportunity to 'put fish in the freezer.' The winter weather can be brutal, affording few fishable days.

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**PROPOSAL 12 - North Gulf Coast**  
**5 AAC 58.065. North Gulf Coast King Salmon Sport Fishery Management Plan.**

*Modify the North Gulf Coast King Salmon Sport Fishery Management Plan, as follows:*

*Proposed Change:*

*(4) the bag and possession limit for king salmon is two fish, with no size limit except for May 15 -July 31 when bag and possession limit for king salmon is one fish, with no size limit;*

*(5) For summer fisheries (April 1-August 31): 20 inches or longer: There is a combined annual catch limit of 5 king salmon 20 inches or longer. A king salmon of 20 inches or longer that is removed from salt water must be retained and becomes a part of the bag limit for of the person who originally hooked the fish. You must not remove a king salmon of 20 inches or longer from the water before releasing it.*

**COMMENTS:** King salmon caught throughout the North Gulf Coast are comprised of mixed stocks. West coast hatcheries provide fisherman with roughly 220,000,000 highly migratory king salmon smolt annually. Most of these fish are paid for with sportfish dollars. Current saltwater king limits are in line with other regions in the State, except Cook Inlet, which is the most restrictive region in Alaska. The Homer Charter Association submitted this proposal and if passed, should apply to non-residents.

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CIRF appreciates the Board members' considerable time and effort in addressing the difficult decisions before them. CIRF members look forward to meeting and discussing these proposals with members of the Board of Fisheries at the upcoming meeting in Homer and Anchorage.

We request the Board honor the Commissioners stated pledge... *'Alaska's fish and game resources belong to Alaskans. We will continue to put the needs of our citizens first.'*

Sincerely,

Pete Zimmerman  
Cook Inlet Recreational Fishermen



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to the commercial and sport fisheries in Homer, Alaska, and I stand strongly against Proposal 43. I have owned and operated a purse seiner in PWS for 24 years. During that time I have never observed the presence of enhanced stocks affecting the wild stock return. Proposal 43 seems to be part of a larger push to cut back production statewide at all hatcheries based on inconclusive studies. This would be detrimental for many fisheries in Alaska and would greatly affect my sole livelihood.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a



permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Megan Corazza  
Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in the commercial and subsistence fisheries in Homer, Alaska, and I stand strongly against Proposal 43. Our family has strong roots in commercial fishing in Alaska beginning in 1938. Presently, we have 3 family seine boats in Prince William Sound. Fishing is a big gamble, finding a way to support our families in Alaska is always a big gamble. Fisheries and the hatcheries that complement them allow Alaskan families to survive and prosper. Alaska Department of Fish and Game provides oversight to insure science backed egg permit amounts. All stakeholders are involved in the process. Alaska has had hatcheries since 1900, the passage of time has proven that, if properly managed, they are a valuable asset and should be continued. Our country is contemplating many ways to promote man made fishery enhancement projects, Alaska already has proven Hatcheries that pay their own way and provide food for the world while providing a livelihood for the fisherman and jobs for Alaskans. With the ups and downs of natural salmon stocks that cannot be predicted, it is also impossible to demonstrate harm from hatcheries that have been on line for over 40 years. I vote to continue the hatchery program in Lower Cook Inlet and Alaska mainly because it would be shortsighted not to.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

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Risk to Wild Salmon Stocks: The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Thank you for allowing me to comment.

Sincerely,  
Richard Corazza



Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I live in Homer and fish in Prince William Sound. I am strongly opposed to Proposal 43. Hatcheries in lower Cook Inlet and PWS are important to me because my family has been fishing out of Homer since 1939, and we believe that hatcheries contribute to the overall health and abundance of salmon in Alaska. I see the hatcheries in the Cook Inlet area benefit all user groups and families who live here, from commercial to sport and also subsistence user groups. If the hatcheries in the Inlet were shut down, I believe all the people would be shocked at the loss of fish they depend on and have come to expect. I fished Cook Inlet for 33 years with my family, and then we moved to PWS as seiners so have been involved in the growth of the hatcheries in the Sound. During the past decade, the largest wild runs the Sound had were also the largest hatchery runs which both made for viable fishing communities around Alaska and also took pressure off the wild stocks as hatchery fish became an important part of the fishery. I totally support the hatchery of Alaska!

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary



reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

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**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

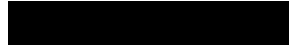
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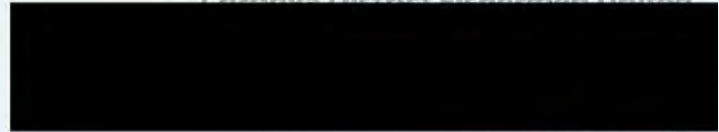


Risk to Wild Salmon Stocks: The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Sonja Corazza



Homer, Alaska



John Wood, Chair [REDACTED]  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
[REDACTED]

November 9, 2023

Re: Lower Cook Inlet Proposals

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region.

As you deliberate, we respectfully ask you to consider our comments:

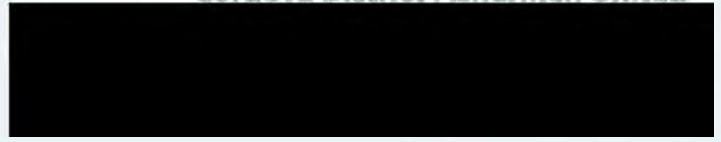
**Proposal 35 - OPPOSE**

We oppose this proposal to create a *Kachemak Bay Wild Fish Priority Management Plan*.

**Proposal 43 - OPPOSE**

We oppose this proposal to amend the *Cook Inlet Salmon Enhancement Allocation Plan* to reduce hatchery production to 25% of the year 2000.

Hatchery Regional Planning Teams members include representatives from Alaska Department of Fish and Game and hold strong backgrounds in the science behind hatchery production, as well as a thorough understanding of local ecologies and regional fisheries. Their open public meetings include scientific reports and presentations based on the most current research available. We support this public framework and would like to see recommendations related to hatchery management to be made through RPTs who have vetted the matters.



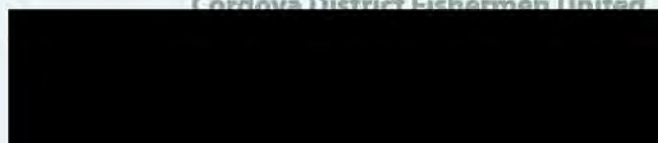
Thank you for your time and consideration of our comments. We greatly appreciate the attention to the issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our comments, please don't hesitate to contact me.

Sincerely,

Jess Rude  
Executive Director



Cordova District Fishermen United



John Wood, Chair [Redacted]  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
[Redacted]

November 9, 2023

Dear Chair Wood and Members of the Board of Fisheries,

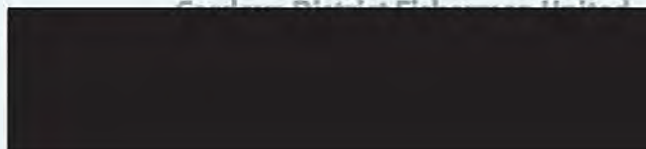
Cordova District Fishermen United (CDFU) requests that you do not pass a board-generated proposal delegating the Alaska Department of Fish and Game (ADF&G) the authority to close state waters to commercial fishing with specific gear types for the purpose of rockfish conservation. ADF&G passed an emergency petition to gain temporary emergency order (EO) authority and has used that new power to close areas of Prince William Sound (PWS) to commercial longline fisheries for now. This emergency petition can be extended or renewed; any discussion on making these regulatory changes permanent belongs in a normal, scheduled board cycle meeting.

A proposal to permanently grant EO authority to ADF&G for groundfish simply does not meet the Criteria for Development of Board-Generated Proposals as printed in the Commonly Used Regulations and Policies of the BOF<sup>1</sup> for the following reasons:

1. It is deeply controversial whether this is in the public's best interest. We would first like to have an opportunity to actually work with ADF&G to find practicable ways to protect rockfish in PWS.
2. There is no urgency in considering the issue, as the emergency powers granted to ADF&G can be extended, or another emergency petition considered.

<sup>1</sup> Alaska Joint Boards of Fisheries and Game: Criteria for Development of Board-Generated Proposal, from: [http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2018-2019/common used policies.pdf](http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2018-2019/common_used_policies.pdf).

1. Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?
2. Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?
3. Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?
4. Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)?



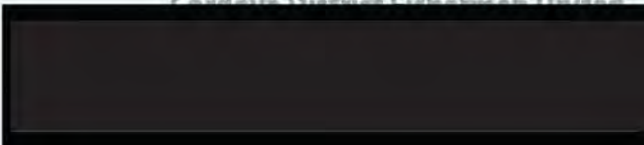
3. The current process of normal board cycle proposal submittal is better suited for discussion of this item.
4. Having this discussion at the Kodiak BOF meeting on January 9th would not create reasonable and adequate opportunity for public comment. Traveling to Kodiak in the middle of winter is difficult for everyone, and the holidays are a challenging time for stakeholder groups to prepare comments and organize testimony. Furthermore, putting a proposal as controversial as this into the Kodiak meeting would diminish opportunity for public comment on the issues of vital importance to Kodiak.

CDFU represents commercial longliners in PWS and is willing and ready to work with ADF&G to find the best way forward to protect rockfish in PWS. There are many ways that CDFU could collaborate with ADF&G to help protect rockfish. We are disheartened that ADF&G never contacted us to communicate their concern for rockfish before making their emergency petition. The petition, which came after longline fishing in PWS effectively was over, claimed that “seeking the assistance of participants in the halibut longline commercial fishery to set gear away from aggregates of rockfish habitat has proven ineffective”.

Unfortunately, we have yet to find a PWS longline fisherman who was contacted by ADF&G about this issue. We are struggling to find the advisory announcements regarding PWS rockfish conservation that were cited in the emergency petition. We want a real opportunity to work with ADF&G on protecting rockfish in PWS before permanent regulatory changes are made and areas are closed to fishing.

The regulatory changes that ADF&G requested in the emergency petition are immensely controversial, and may have far reaching impacts on the commercial fishing sector and commercial fishing dependent communities throughout Alaska. The current closures in PWS, if extended into next summer and beyond, will have a devastating effect on the small boat longline fleet operating out of Cordova. Many of our members longline from their “bowpicker” vessels which once loaded down with longline gear cannot safely fish outside of PWS. By excluding those vessels from areas of PWS, these longline closures will also effectively be reallocating PWS halibut from the commercial to the sport sector.

Stakeholders and the public deserve ample time to respond to controversial proposals that are as potentially allocative and impactful as this is. A board-generated proposal passed at this point would be brought to the Kodiak meeting in January, which is an inappropriate time and place for this discussion. It is expensive and time consuming for our members to travel to Kodiak in the middle of



winter. The regular, in-cycle PWS BOF meeting scheduled for December 2024 is the right place for such a proposal to be debated. Before permanent regulatory changes are made, we would like to have the opportunity to work directly with ADF&G to identify rockfish habitat of concern and direct fishermen away from it. Similar work has successfully been done in Southeast Alaska by Alaska Longline Fishermen's Association (ALFA).

For all of these reasons, CDFU is urging all BOF members to vote against any board-generated proposals delegating EO authority to ADF&G for the purpose of rockfish conservation. We are ready to work directly with ADF&G and members of the Board of Fisheries to find the best ways forward to protect rockfish.

Sincerely,

Jess Rude  
Executive Director

cc: Märit Carlson-Van Dort [redacted]  
Gerad Godfrey [redacted]  
Mike Wood [redacted]  
Tom Carpenter [redacted]  
Stan Zuray [redacted] Greg Svendsen [redacted]



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I strongly oppose Proposal 43. For three generations, my family has lived in Kachemak bay and commercially fished. After a decade of hard work, I finally have my own fishing operation, as well as permits for Lower Cook Inlet seine and Prince William Sound seine. In the winter season, I build seines in Homer. To watch these misguided groups and individuals submit proposals year after year that threaten my family's livelihood has become more than frustrating. The audacity to try and put the wants of weekend warriors from elsewhere above the needs of the local, generational year round community is shameful. I appreciate the board's decisions in the past to put Alaskans first and not sacrifice our hatcheries and resources for the sake of foreign interest and cool fish pictures. I fully trust the board to make educated choices and thank them for their service to Alaska.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild





salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks.





A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Gus Cotten



Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm part of the Valdez commercial and sport fisheries, and I firmly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Nick Crump

[REDACTED]

Valdez, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial fisheries and seafood processing in Valdez, Alaska. I strongly oppose Proposal 43. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

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Sincerely,  
Edward Day



Valdez, Alaska



United States Department of the Interior  
Office of Subsistence Management



PC248

IN REPLY REFER TO:  
OSM.23130

NOV 13 2023

John Wood, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game

Dear Chair Wood:

The Alaska Board of Fisheries will consider 43 proposals at its Lower Cook Inlet Finfish meeting from November 28 – December 3, 2023.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed these proposals and will not be providing specific written comments to this set of proposals. However, OSM believes that adopting proposals 1, 2, 3, 6, 9, 10, 11, 12, 34, 38, 42 and/or 256 may affect Federal subsistence fisheries and users. Most of these proposals involve fisheries that are outside of Federal jurisdiction but adoption of them may impact migratory resources returning to Federal public lands that rural Alaskans rely on for the opportunity to continue subsistence activities. Although we are not providing proposal specific written comments prior to the meeting, OSM may wish to comment during the meeting on items that impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to continuing to work with the Alaska Board of Fisheries and the Alaska Department of Fish and Game.

Sincerely,

Sue Detwiler  
Assistant Regional Director  
November 13, 2023

cc: Federal Subsistence Board  
Interagency Staff Committee  
Benjamin Mulligan, Alaska Department of Fish and Game  
Art Nelson, Alaska Department of Fish and Game  
Mark Burch, Alaska Department of Fish and Game  
Administrative Record



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in the commercial and subsistence fisheries in Cordova, Alaska, and I strongly oppose Proposal 43. I would not be able to live in Cordova without PSWAC hatcheries.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Andrew Eckley

[REDACTED]

Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to commercial fishing in Cordova, Alaska. I firmly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Elias Eckley



Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial, subsistence, and public use fisheries in Cordova, Alaska. I firmly oppose Proposal 43. The salmon run that the hatcheries supply gives fishermen help to feed the world and their families when the wild run isn't strong.

Sincerely,  
Richard Eckley



Cordova, Alaska



**Submitted by:** Mel Erickson

**Community of Residence:** Soldotna AK

**Comment:**

Proposal 1, I oppose this proposal as written. I could support it if the may 15 date was changed to later in May, ADF&G studies have proven only 6% of kings caught in this fishery are spawning fish, and of this 6% the fish are from multiple river systems. Also the Data from past studies do not indicate any of these fish are early run Kenai Kings, the other issue i have with this proposal is the closures are based on pre season forecasts and projections and not actual sonar counts. This fishery should not be restricted or closed until sonar counts indicate that escapements will not be met. the other problem is if the entire inlet is closed to king fishing north of bluff point a boat cant fish for halibut north of bluff point if they have king salmon on board that were caught south of bluff point, the fishery should never be closed more than 1 miles from shore. Other options should also be considered like restriction of bait or less days per week to reduce time & effort instead of a total closure.

Proposal 2

I support proposal 2 and i am the author of this proposal, The king fishery along the beach from anchor point to deep creek harvests mostly feeder kings 94% and low numbers of spawners 6%, just about the same as the king fishery south of Bluff point. This fishery should remain open until late may when the department has actual run strength info from sonar counts. Most kings don't enter the rivers until very late may or early June. It is totally ridiculous that north of bluff point is closed while south of bluff point is open to harvest of 2 kings per day. A date between May 20-31st would be more in line with return of spawners.

Proposal 3. I support this proposal and am also the Author, many years the Commercial setnet fishery north of ninilchik has been open several days per week in the sockeye fishery but also is open for the harvest of King salmon, while the sport fishery along the beach between Anchor River & Deep creek is closed this makes no sense at all as the sport fishery is very small in effort and very inefficient with hooks compared to 1,000's of nets.

Proposal 4 , I support this proposal and i am also the author of this proposal. Anchor point is a much better demarcation line and much easier to determine if your south of the radar marker at anchor point than if your north or south bluff point to separate Lower cook inlet from upper cook inlet. Bluff point is inconcise as a regulatory marker and makes the regulation muddy, bear cove in Upper K bay is actually north of bluff point as is many other areas in Kbay but remains open to king salmon harvest.

Proposal 1: Support With Amendments

Proposal 2: Support

Proposal 3: Support

Proposal 4: Support

Proposal 5: Support

Proposal 6: Support With Amendments

Proposal 9: Support With Amendments

Proposal 18: Support

Proposal 23: Support



**Submitted by:** Leonard Fabich

**Community of Residence:** Homer, Ak

**Comment:**

As a commercial salmon seiner in Lower Cook Inlet as well as a sport fisherman I am in opposition of proposal 35,36,41,42,43

I feel this is in the best interest of my commercial fishing endeavors and well as protecting my livelihood as a commercial fisherman.

Proposal 35: Oppose

Proposal 36: Oppose

Proposal 40: Support

Proposal 41: Oppose

Proposal 42: Oppose

Proposal 43: Oppose

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November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to commercial fishing in Homer, Alaska, and I firmly oppose Proposal 43. Hatcheries in lower Cook Inlet support a certain group of individuals. For the overall economy of Homer, they do a lot. Releasing hundreds of millions of fry into the ecosystem affects wild stock. There is no scientific evidence of what the carrying capacity of the gulf of Alaska is. As far as I know, without the state's funding, hatcheries would not be viable.

Sincerely,

Mikee Flora



Homer, Alaska



**Submitted by:** Jacqueline Foss

**Community of Residence:** Sitka

**Comment:**

I am opposed to proposals 34, 35, 36, 41, and 43.

All of these proposals are aimed at stopping hatcheries and creating additional regulation for the Alaska Department of Fish and Game to deal with. Currently, the Department considers wild stock and has adequate tools to manage and conserve wild stock. Further, these proposals ignore existing management plans and do not provide any direction in how to integrate the two.

Proposal 34: Oppose

Proposal 35: Oppose

Proposal 36: Oppose

Proposal 41: Oppose

Proposal 43: Oppose

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November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I commercial and sport fish in Cordova, Alaska, and I strongly oppose Proposal 43. The hatcheries provide surplus fish for harvesting.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
John Grocott

[Redacted Signature]

Cordova, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to commercial, public use, and sport fishing in Homer, Alaska. I stand firmly opposed to Proposal 43. Hatcheries are important first and foremost because I believe they can provide a consistent, reliable source of food, and income for my family. I recently read an article from Nautilus | Science Connected that it estimated that more than 90% of salmon sold in the world is farmed salmon. This is unacceptable. Alaska wild stock salmon and Alaska hatchery salmon is bar none the healthiest meat you can consume today. For that reason alone, we should not keep our hatchery progress consistent, we need to increase hatchery production in sustainable ways. If we can substantially raise the percentage of Alaska salmon sold in the world. Doing that with Alaska salmon will only boost our economy which we need. Boost Alaska salmon's global outreach which we need. Boost the health of all people and animals consuming Alaska salmon which we need. Let's roll back to my previous statements about the economy, and feeding and providing for our families. Our US economy is hurting! That is a fact! Our Alaska fishing economy is really hurting. That is also a fact! Setting aside the fact that a potential large scale war is on the horizon, and focusing solely on the economy. Is cutting jobs, and cutting a potential source of food that Alaskans and Americans can be eating the answer? I think not. Let's use facts and hard data to make a logical decision. Let's also make sure people's livings, health, and survival are at the forefront of that decision. Let's sustainably increase Alaska/Lower Cook Inlet hatchery salmon production! And let's start increasing smart with all the proven factual science and data possible. We can all agree hatcheries are not the enemy. Farmed fish is the enemy!

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:



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**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.



Public Input and Participation: ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

Risk to Wild Salmon Stocks: The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Camron Hagen



Homer, Alaska



November 11, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm involved in commercial fishing in Seward, Alaska, and writing to oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.



Comprehensive Planning: Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

Risk to Wild Salmon Stocks: The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Arne Hatch



Seward, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in the commercial, sport, and subsistence fisheries in Cordova, Alaska. I firmly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.



**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Anna Jarvis

[REDACTED]

Cordova, Alaska



November 11, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial and sport fishing, in addition to seafood retail, in Homer, Alaska. I am strongly opposed to Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

Sincerely,

Forest Jenkins



Homer, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am tied to commercial fisheries in Clam Gulch, Alaska, and I stand strongly against Proposal 43. Salmon hatcheries provide salmon that support local processors. I need those processors to market the salmon we catch. The hatcheries support fishers and processors, who both pay borough property taxes, thus supporting local schools, south peninsula hospital, and service areas. Cook Inlet Aquaculture Association (CIAA) is financially dependent on hatcheries. CIAA has done a lot of scientific research beneficial for the drift fleet and upper Inlet set netters, such as operating the weirs which proved the sonar counter in the Yentna River was not accurate.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

Regulatory Authority: The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

Sincerely,

Brent Johnson



Clam Gulch, Alaska

November 11, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I live in Cordova, Alaska, and participate extensively in fisheries, including commercial, sport, and subsistence fishing, as well as seafood retail. I stand firmly opposed to Proposal 43. Hatcheries help stabilize salmon runs and income for fishermen and the communities. The assertions in Proposal 43 are wildly exaggerated and full of assumptions that at this time are virtually impossible to corroborate. This proposal in one form or another has been overwhelmingly defeated at Board of Fish and should be again this time.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a



permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Eli Johnson  
Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I operate out of Ketchikan and am firmly opposed to Proposal 43. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

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**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

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Sincerely,  
David Jones





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to sport, commercial, and subsistence fisheries, as well as charter guides and seafood retail, in Cordova, Alaska. I stand firmly against Proposal 43. Hatcheries are a stunning success story and need to be supported. Every sector from sport commercial personal use and subsistence all benefit from our hatcheries across the state.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

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**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

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Sincerely,  
Ken Jones  
Cordova, Alaska



**Submitted by:** Eric Jordan

**Community of Residence:** Sitka, Alaska

**Comment:**

Sitka, AK

Nov. 13, 2023

Chairman Wood and BOF members,

I am writing to oppose proposals 36, 42, and 43. As a participant in Alaska’s ocean ranching of salmon since helping found NSRAA in 1976, and been involved as an employee (briefly at founding) board member off and on since 1978, and currently elected as a troll representative I find these attacks on our ocean ranching programs mis-informed and mis-guided,

I am a life long salmon conservationist, having fought everything from clear cut logging to High Seas gillnetting, to ill advised mining projects, to trawl by-catch to name a few problems salmon face. I nominated the late great Senator Richard Eliason for his work to ban finf-ish farming, and to push through the strongest wild salmon priorities in the world through the Legislature, for the Wild Salmon Hall of Fame.

I read all kinds of salmon papers, including a recent one on the effects of pink salmon abundance on other salmon size and survival. In SE Alaska we have only minimum hatchery pink salmon hatchery releases and are still suffering from size issues at age in other salmon species.

Salmon survival and growth are critical issues to be researched and dealt with by everyone in Alaska. As a person who has spent 74 years on the waters of Alaska from the Yukon to Ketchikan I am deeply concerned for the future of salmon and other species. But proposals like these distract us from the reality of the changes in our salmon ecology and hurt rather than help us understand and adapt.

In any case, I urge the BOF to not only oppose these proposals but to admonish the proposers to be better informed and more considerate of everyones time before making these type of proposals.

Proposal 36: Oppose

Proposal 42: Oppose

Proposal 43: Oppose

Proposal 259: Support



**Submitted by:** Eric Jordan

**Community of Residence:** Sitka, Alaska

**Comment:**

Sitka, AK

Nov. 13, 2023

Chairman Wood and BOF members,

I am writing to support adoption of proposal 257 or 258, or, and preferably, 259. I have heard and read a lot about them at our Sitka F&G AC, the NSRAA Board, and countless conversations and communications with ADF&G staff, trollers, guides, and resident sport fishers.





In my previous comments on the ACRs 11,12,& 13 I used strong words (sacrosanct and malfeasance) to describe the action taken by ADF&G to delete “sport fishery” from the adopted regulation based on the RC signed by representatives of SEAGO, ATA, and Territorial Sportsmen. While I believe adoption of all three ACR’s for consideration by the BOF is the correct regulatory action to take, I still think the bigger issue of corruption of the BOF regulatory process by the ADF&G needs to be addressed by the BOF at some time.

I think the cleanest way to correct the changes made by omitting “sport fishery” is to simply re-insert it as suggested by ATA in 259. I voted with NSRAA unanimously to recommend that action.

Nevertheless, I also think it would be a good idea to address the issue of averaging and resulting deterioration of in-season management < of king salmon in the SE guided and non-resident king salmon sport fishery for both allocative and conservation interests of king salmon as recommended by our Sitka AC. However, after hearing BOF member Marit Carlson-Van Dort comment at our AC meeting, I understand the BOF may want to wait to take that more comprehensive action at the next full SE BOF finish meeting.

Patience and persistence are an internal part of my success as both a fisherman and as a fisheries management, sharing, and conservation activist. So is a measured response to relationship, environmental, mechanical, and political challenges. Be advised this is a very “measured” response to the “malfeasance” by ADF&G needing to be dealt with now by the BOF.

Thank you again for taking up all three ACR’s on this issue.

Eric Jordan

F/V I Gotta

Sitka, AK

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**Submitted by:** Mark Glassmaker

**Community of Residence:** Soldotna

**Comment:**

Kenai River Professional Guide Association

On time written comments

Lower Cook Inlet Finfish Meeting

November 28 - December 1, 2023

Location: Homer – Land's End Resort

Proposal 1

Support

We believe the department is simply adding this regulatory action into the management plan based on the overall trend of low productivity for Cook Inlet king salmon stocks over the past decade. This provides for clear direction in the plan regarding early run stocks transitioning through the summer Upper Cook Inlet saltwater king salmon sport fishery when preseason projections require restrictions or closures on either the Anchor and/or Kenai Rivers.

Proposal 2

Oppose

Given the last decade of low abundance for both early and late run Kenai king salmon stocks as well as a downward trend in king salmon productivity Cook Inlet wide, we believe saltwater king salmon closures north of Bluff Point are warranted based on preseason forecasts which require restrictions or closures on either the Anchor and/or Kenai Rivers.

Proposal 3

Oppose

If restrictions or closures are enacted for the late run of king salmon on the Kenai River, harvest opportunity in the Upper Cook Inlet saltwater sportfishing should also be restricted or closed.

Proposal 4

Oppose

Although we support clear and concise demarcation lines, this proposal would open an estimated 22 miles of coastline that is currently closed to protect migrating Upper Cook Inlet king salmon stocks.

Proposal 1: Support

Proposal 2: Oppose

Proposal 3: Oppose

Proposal 4: Oppose

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November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to seafood processing in Anchorage, Alaska, and I am strongly opposed to Proposal 43. Hatcheries in the lower Cook Inlet region and across Alaska are critically important to both fishermen (commercial and sport) and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon for their living. Processors need the volume of salmon in order to stay viable and operating for all fisheries, and hatcheries were established in Alaska with significant and necessary restrictions in the form of the sustainable salmon policy and genetic policy. These are enhancement programs well supported by the state historically for the benefit of all Alaskans -- personal use, subsistence, sport, commercial. The research that is ongoing through the Hatchery Research Plan is critically important to pay attention to and understand prior to making any changes.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a



demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

Department Oversight: The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

Lack of Evidence: No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

Sincerely,

Nicole Kimball



Anchorage, Alaska



Phone: [REDACTED]  
Fax: [REDACTED]  
[www.kraa.org](http://www.kraa.org)

To: John Wood, Chair  
Alaska Board of Fisheries  
Boards Support Section  
[REDACTED]

November 13, 2023

RE: Lower Cook Inlet Finfish, November 28-December 1, 2023  
Opposition to Proposals 34, 35, 36, and 41, 42, and 43

TO: Chair Wood and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) respectfully requests that the Alaska Board of Fisheries reject Proposals 34-36 and 41, and 42 at the upcoming Lower Cook Inlet meeting in Homer and Proposal 43 during the Upper Cook Inlet meeting later this winter. As a whole, the stated proposals once again lack coherence, have the potential to devastate hatchery programs to the point of inoperability, and offer no improvement on the ability of the Department to administer regulation or provide oversight to hatcheries.

- Proposals 34 and 35 offer no actual regulatory language or framework and would create only redundant guidance for the Department that already exists through the polices for Management of Sustainable Salmon Fisheries and that of Mixed Stock Fisheries.
- Proposal 36 calls upon no existing regulation governing limitation of operational flexibility for cost recovery activity and, though limited to Tutka Bay Lagoon Special Harvest Area could have implications for other aquaculture associations in the manner in which cost recovery activities may be conducted state-wide.
- Proposal 41 creates closed waters at the Tutka Bay Lagoon that, as delineated, would be hard to enforce. Alternate and more easily enforceable closed water designation is offered by ADF&G in an alternate proposal.
- Proposal 42 is allocative, and though we prefer to remain neutral on allocative matters, this proposal would severely impact Cook Inlet Aquaculture Association's ability to achieve cost recovery goals within the designated Special Harvest Area (SHA). KRAA does not support action that limits or interferes with an aquaculture association's ability to make decisions or achieve goals related to harvest within their designated SHAs. SHAs are established for the purpose of allowing for cost recovery activities and intended to be managed to allow the association to meet broodstock and cost recovery goals.



- Proposal 43, which will be heard but not deliberated at the LCI meeting offers no evidentiary support or basis for its claims, and the desired hatchery production reductions—amounting to a 75% reduction as written—would devastate the ability of the programs to operate with any cost effectiveness and likely result in the loss of many non-production programs.
- Proposal 43 is duplicated as Proposal 59 slated for the Kodiak meeting in January where it appears to be geared toward all of the state’s hatchery programs. Why the duplicative proposal, which will now be heard at *three* Board meetings during this cycle and ignores the fact that it has already been offered and rejected at least twice in the last 5 years? The proposal(s), and its contentions, in this new iteration, continues to rely on the same speculative “ocean ranching” thesis without accounting for the multiple variables that occur each year that impact food availability—ocean temperature, currents, mixing through storms, etc.—and also fails to address spatial distributions of salmon from different origins that appear to show limited or non-existent competition.

Kodiak Regional Aquaculture association asks the Board to review the previous emergency petitions, ACRs and proposals that have been summarily rejected by the Board of Fisheries since 2018. The pattern of the proposals for the 23-24 Board cycle is simply a continuance of the same and repeated efforts of a few individuals to assert their conviction that Alaska’s hatchery programs lack sufficient oversight and need to be curtailed. The assertions and implications that somehow hatchery operations have been given a “pass” on issues of sustainability, scientific defensibility, or rigorous oversight are simply unfounded. The public record from all of the meetings in which hatchery proposals have come before the Board reaching back five or more years have repeatedly affirmed the regulatory scrutiny of Alaska’s hatchery programs by ADF&G, the Board process, and the Regional Planning Teams as well as the Alaska Hatchery Research Program (AHRP). Moreover, and this is important, the international 3<sup>rd</sup> party certifiers for fishery sustainability, the Marine Stewardship Council and GAO Responsible Fisheries Management certification, frequently review Alaska’s hatchery programs and have found them sustainable.

Hatchery programs seem to be an easy target when folks are disappointed with a fishery return or outcome. How and when and how many fish return to a specific river system or region have a host of variables, many of which are outside the control of any decision maker or human action. Efforts to blame hatcheries by way of correlation, supposition, and biased opinion have not succeeded in making a substantive, defensible case against Alaska’s hatchery program. Moreover, proposed solutions are more about allocative outcomes than hatchery regulations within State guidelines.

Alaska hatchery operators understand our position within the context of Alaska’s fisheries, and accept that there will always be questions regarding hatchery operations because we work in a



dynamic biological environment. We have supported substantive science relative to the programs in Alaska such as the Prince William Sound straying study (AHRP) as well as marking hatchery releases and assessing spatial distribution of hatchery fish. We support ongoing efforts to acquire scientific information regarding hatchery impacts--information that is verified and acquired without a preconceived bias. Hatchery operators have also observed that the ebb and flow of wild stocks within the hatchery areas do not seem to be impacted, overall, by our programs. It's hard to refute that some of the largest wild salmon runs in Kodiak, Prince William Sound and S.E. Alaska have occurred while the current level of hatchery releases were present. Furthermore, record returns to many wildstock and hatchery systems have occurred multiple times within even the recent 5-10-year period. These are the types of hard facts that do not seem to fit well into the anti-hatchery models of harm and correlation. Moreover, hatchery operators are aware of the importance of Alaska's hatcheries to the economy of coastal Alaska and dozens of Alaska communities. Many anti-hatchery advocates, as reflected in these proposals, discount or ignore the known harm that would occur to fishermen and coastal communities if their proposals were adopted and instead, based on speculative benefits that may or may not occur to other areas of Alaska, seek to reduce or effectively eliminate hatchery production.

It may be the case that with so many new Board members, it is difficult to recognize the redundancy of these proposals. However, we have seen similar efforts as ACR2 in 2018 and through a series of proposals at the previous LCI meeting in Seward, proposals in Southeast Alaska, and as Proposals 49-55 at the 2021 Prince William Sound Finfish and Shellfish meeting in Cordova. At that meeting, I simply re-submitted over 30 pages of written comment KRAA had submitted at previous meetings on the same topics and similar proposals. KRAA's comments represent just a fraction of the time and effort demanded of those who have been forced to respond to repetitive proposals and to defend the Alaska Hatchery Programs. I would again draw your attention to that record, but more importantly, I would ask the Board to recognize that, at each turn, the Board has rightly rejected this systematic effort to malign Alaska's hatchery programs and their underlying science, management, and oversight by ADF&G.

In summary, KRAA asks that you please reject proposals 34, 35, 36, and 41,42, and 43. Individually they have little merit or basis for adoption by the Board, and collectively they would do great harm to the viability of Alaska's salmon fisheries and coastal communities.

Thank you for the opportunity to submit these comments.

Tina Fairbanks  
Executive Director



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I commercial fish in SE Alaska, and I stand strongly against Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.





**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
William Leese





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

As a southern Alaska purse seiner, I can't state enough how important salmon hatcheries are to our fishery. The presence of hatcheries takes fishing pressure off of wild stocks and spreads the fleet around. Without hatcheries, myself and my four crew members would find it hard to support our families.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
John Liddicoat



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am tied to commercial fishing and seafood processing in Alaska. I firmly oppose Proposal 43. I don't believe that hatchery produced salmon are reducing the wild salmon stocks. This is not a worthy offense against hatcheries. If you take away the production that the hatcheries provide, the farmed salmon operations will be cheering loud and clear, and it's common knowledge that farmed salmon operations deteriorate the environment they grow up in. There are many more negatives to farms for fish, but this is a subject to be considered, and there would be no doubt that they would replace that market share with their products.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

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Sincerely,  
Joe Lindholm

November 11, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm tied to sport, commercial, and subsistence fishing in Cordova, and I stand strongly against Proposal 43. Hatcheries in Alaska help preserve a salmon lifestyle, and sustain many coastal Alaska communities. Hatchery salmon provide incomes for many families, and food for many more.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Tyee Lohse

[REDACTED]

Cordova, Alaska



**Submitted by:** Jonathan Madison

**Community of Residence:** Kenai, AK

**Comment:**

Proposal 1: Do not support.....Alaska Fish and Game have been doing a good job managing the Fishery by Emergency Orders no need to permanently change the plan often times the fishing is shut down prematurely.

Proposal 2: Support: majority of the fish caught in this area are feeder kings and not spawning fish headed to Cook Inlet streams...closing this area is detrimental to the recreational fleet as this is one of the most productive areas to fish for king salmon year round and especially in May/June....if forecasts are low or runs are late than eventually meet escapements later in the season....its too late for anglers to recoup the loss of prime fishing time in this area

Proposal 3: Support ...If commercial set nets are allow to harvest King Salmon in this Area than the Recreational fleet should be allowed to harvest King Salmon as well.

Proposal 4: Support...Moving the boundary will do 2 things...It will allow anglers access to fish the most productive stretch of this area and also it will clear up the current boundary issues of Bluff Point....if you do not have good electronics/gps it is difficult to decipher exactly where the Bluff Point boundary is....a lot of time there is often 25-50 boats out there threading the needle on the boundary, there is to my knowledge no onshore physical marker...on the other-hand the Anchor Point boundary is clearly visible onshore and can be easily recognized by all vessels and law enforcement entities. Moving the boundary North to this spot is a good compromise when the fishery gets restricted: it closes most of the Upper Inlet to King Harvest to protect spawners but allows anglers continued access to the most accessible and productive King Salmon fishing grounds.

Proposal 43: Support.....It is time the State of Alaska reduces the number of pink salmon that are being released by hatcheries into the Pacific Ocean. Salmon ranching of pinks is flooding the ocean with too many salmon and other salmon species are being negatively affected by this. The mass salmon ranching efforts only benefit 1 main user group commercial fisherman as pink salmon are the least desirable species to catch and our Wild runs already provide more than enough opportunity to catch pink salmon. I understand that pink salmon are the cheapest and the best return for your dollar however at what cost To other species? To the wild genetics? The market further demands a reduction in supply as this past year many fish processors either paid very little or refused to buy pink salmon. Why are we producing all these pinks that are worth very little to nothing and at the same time causing irreversible ecological damage to wild runs of all Pacific salmon species?





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm part of the commercial and sport fisheries in the Clam Gulch/Ninilchik area. I strongly oppose Proposal 43. Lower Cook Inlet hatcheries produce tens of thousands of salmon for the general public to utilize for sport, food, commerce, employment, lifestyle etc. This is a benefit to all and there are no reliable scientific negatives to this hatchery salmon production.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
David Martin  
Clam Gulch/Ninilchik, Alaska

November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm from Cordova, Alaska, and I commercial, subsistence, and sport fish. I strongly oppose Proposal 43. Hatcheries are important to me because they are part of my livelihood and many other Alaskans' livelihoods. Not only do hatcheries just employ Alaskans, but they employ people from all over the world. They help feed people all over the world healthy salmon, as opposed to farmed salmon which is becoming bigger and bigger all the time.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Brandon Maxwell  
Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial and subsistence fishing, as well as seafood retail, in Cordova, Alaska. I strongly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Matthew Maxwell



Cordova, Alaska

November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I commercially fish in Homer, Alaska, and I stand strongly against Proposal 43. I'm a 50 year Homer resident, in China Poot Bay. Remember in the years when this Harbor was full of seiners, and Homer was thriving with fishing. We all understand global warming and the changes. We also understand that we would like our young people to have an opportunity to Fish as we did. Everyone knows about the grain of the fleet and how expensive it is to get in. Lower Cook Inlet wanna be the cheapest and easiest for our young people. Help them!

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a



permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Barb McBride

[REDACTED]

Homer, Alaska





**Submitted by:** Jerry McCune

**Community of Residence:** Cordova Alaska

**Comment:**

I oppose proposal 43 first there is no proof as suggested in the proposal to wild stocks .Commercial fishermen depends on hatchery stocks for their income , boat payments, family income. Allot fish is also provided by hatcheries for personal use and Sportfish.Also the hatchery have payments and budgets, and employ a lot of Alaskan employees. There a lot of miss information about ocean conditions and folks from outside telling us all kinds of things without stepping a foot inside Alaska or a Alaska Hatchery. I have fished for 65 years ,salmon runs have changed so some much over time. Sometimes there are huge wild runs and small Hatchery runs and it happens both ways .

Proposal 43: Oppose

State of Alaska Board of Fisheries

Lower Cook Inlet Finfish, November 28 – December 1, 2023

Homer, Alaska

Hello Chairman Wood and Members of the Board of Fisheries,

My name is Malcolm Milne, I've been an Alaskan resident since 1995 and live near Homer. I own and operate the F/V Captain Cook, am an Area H Purse Seine Permit Holder and have participated in the Lower Cook Inlet seine fishery since 2010. I am currently a board member of Cook Inlet Aquaculture Association and an Alternate member of the Homer Fish and Game Advisory Committee. Thank you for considering my comments regarding the Commercial (salmon) proposals for the 2023 Lower Cook Inlet Finfish meeting.

**Proposal 34 OPPOSED** I concur with RC2 ADF&G Staff Comments

**Proposal 35 OPPOSED** I concur with RC2 ADF&G Staff Comments

**Proposal 36 OPPOSED** I concur with RC2 ADF&G Staff Comments

**Proposal 37 SUPPORT** The Homer AC submitted this proposal to allow additional gear types access to the cost recovery efforts of Cook Inlet Aquaculture Association. I support authorizing additional gear types for cost recovery in Lower Cook Inlet.

**Proposal 38 SUPPORT** The Homer AC submitted this proposal to allow additional gear types access to the cost recovery efforts of Cook Inlet Aquaculture Association. I support authorizing additional gear types for cost recovery in Lower Cook Inlet.

**Proposal 39 SUPPORT with Amendments** I generally concur with RC2 ADF&G Staff Comments with amendments based on Proposal 40 to be submitted in an RC.

**Proposal 40 SUPPORT with Amendments** I agree with parts of proposal 40 with amendments based on Proposal 39 to be submitted in an RC.

**Proposal 41 SUPPORT with Amendments** with language from proposal 39. I support the concept and rationale of this proposal but prefer the closed waters as suggested in Proposal 39

**Proposal 42 OPPOSED** I support the status quo. The proposal does not mention that at the December 2013 Lower Cook Inlet Meeting in Anchorage, Proposal 84 was adopted with amendments<sup>1</sup> and addressed the sunset clause that was previously adopted. Proposal 84 as carried went into regulation in 2014 as stated in RC2 ADF&G Staff Comments.

**Proposal 43 OPPOSED** I concur with RC2 ADF&G Staff Comments and support the status quo of allowing ADF&G professional biologists to determine appropriate hatchery levels. Additionally,

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<sup>1</sup> <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=12-08-2013&meeting=lci>



there seems to be a discrepancy in Proposal 43. The proposal states “Reduce hatcher , **production to 25%** of the year 2000 production as promised in 2000.” and the description “The hatchery management met with the Governor and proffered that if the Board would not take up the proposal they would reduce their **production by 25%.**”<sup>2</sup> These are obviously very different numbers. Either way, I still support the status quo.

Sincerely,

Malcolm Milne

Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am part of the commercial fisheries in Homer, Alaska, and I firmly oppose Proposal 43. These hatcheries are critical to the continued success of our commercial fleet and integral to the overall community.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.



**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Evann Moore

[Redacted Signature]

Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am tied to commercial fisheries in Sitka, Alaska, and I oppose Proposal 43. I am a strong proponent of Alaska's Unique PNP and Regional Hatchery program, having participated in the formation of Alaska's first PNP back in the '70s' (CBAA), later to become NSRAA. I have seen and enjoyed the benefits of this successful, well managed program for nearly half a century. I serve on Boards of Directors for Northern Southeast Regional Aquaculture Association, Armstrong Keta Inc. (PNP), sometimes on Joint Regional Planning Team, as well as my industry group, Alaska Trollers Association. I have seen firsthand the care that is taken to assure protection of wild runs in the permitting of our projects, establishing production levels, locations etc. If anything the process tends toward over precautionary. But this is to be expected since ADF&G staff is tasked with protecting Alaska's wild salmon as first priority.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.

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Sincerely,  
James Moore

[REDACTED]

Sitka, Alaska

November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am tied to sport fishing in Alaska. I am firmly opposed to Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.

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Sincerely,  
Kenneth Morgan





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I am an area E fisherman in PWS/ Copper River. I reside in Seward, AK. I strongly oppose Proposal 43. Hatcheries help secure the future of salmon fishing for all fishermen and families that depend on salmon.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Jenny Nakao

[REDACTED]

Seward, Alaska

**Submitted by:** Beaver Nelson

**Community of Residence:** Homer, Ak



**PC284**

**Comment:**

Proposal. 43. OPPOSE

Wild Alaska salmon stocks have much bigger competition for food in the ocean with juvenile pollock and cod than with hatchery pink fry  
by orders of magnitude.

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**PC285**

**Submitted by:** Jessie Nelson

**Community of Residence:** Homer, AK

**Comment:**

Proposal 43. OPPOSE

Submitted by Fairbanks F&G AC

This proposal would devastate several coastal communities that rely on hatchery production of chums, pinks, coho and sockeye salmon. These fish are utilized by sport, subsistence, personal use and commercial people. They are provided by commercial fishermen at little cost to the public. Many, many people go to Seward to snag sockeye, go to China Poot to dipnet sockeye, go to Valdez for coho and pinks, etc. Thanks to recent studies the amount of pink salmon in the ocean is approximately.4% - yes, point 4 per cent. This is nearly insignificant and considering Russia releases 3 times as many as does Alaska. there is no biological basis for this proposal. It would do great damage to our state.

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**PC286**

**Submitted by:** Thomas Nelson

**Community of Residence:** Homer, AK

**Comment:**

I would like to express my OPPOSITION to proposal 43, seeking to reduce hatchery production. This proposal has been submitted for years and has always been rejected. There is no proven empirical data to substantiate the claims, all salmon are a very small minority of the fish biomass in the North Pacific. Alaska hatchery pink salmon represent less than 1/2 a percent of the nektonic biomass. The assertions made are merely opinion, with very speculative, theoretical studies used as justification. The hatchery program is very important to coastal communities around Alaska providing subsistence, personal use, sport and commercial opportunities to harvest returning fish.

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NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.



November, 13 2023

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries



RE: Opposition to Proposals 34, 35, 36, 41 & 43, Support for Proposal 259

Dear Chair John Wood and Board of Fisheries Members,

Thank you for the opportunity to comment on salmon enhancement related proposals submitted to the Alaska Board of Fisheries for the 2023 Lower Cook Inlet Board of Fish meeting.

I am the General Manager of The Northern Southeast Regional Aquaculture Association or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25 member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons from our region. Our board has broad representation from our region and at our Fall November 9<sup>th</sup>, 2023, meeting, our 25 member board passed a unanimous resolution, with no abstentions, **strongly opposing** proposals 34, 35, 36, 41 & 43. All these proposals are opposed by ADFG in their staff comments as well.

NSRAA **strongly** encourages the BOF to **oppose** proposals 34, 35, 36, 41 & 43. Proposals nearly identical to these proposals have been submitted multiple times over the years by the same proposers. Specifically proposal 43 has been submitted to the Board of Fish with virtually identical language a total of 7 times since 2003, in regions from Southeast to Prince William Sound, to Lower Cook Inlet. For 2 decades these proposals have not been acted upon by the Board of Fish and NSRAA encourages the board to continue to oppose proposal 43. These current proposals before you are the latest versions which take up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

Proposals 34, 35, 36, 41 & 43 are punitive in nature and do not attempt to address any allocation issue in the LCI Alaska area. The proposals, whether intentional or not, would have tremendous financial impacts for ADFG, hatchery operators and result in a reduction and likely elimination of most enhanced salmon production in the region.

NSRAA unanimously supports Proposal 259 which would reinsert the word “**Sport Fishery**” into the SE Alaska King Salmon Management Plan, as agreed to by stakeholders and the board, at the Anchorage-SE Alaska Region BOF meeting in 2022.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,

Scott Wagner  
General Manager



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I port from Cordova, Alaska, and I participate in the commercial and subsistence fisheries. I stand strongly opposed to Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Sam Nuzzi



Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I commercial, sport, and subsistence fish from Cordova, Alaska. I stand strongly against Proposal 43. Alaska's Fisheries are valuable not only to communities like mine that exist because of them, but also to the identity of most Alaskans.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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Sincerely,  
Tracey Nuzzi

[Redacted Signature]

Cordova, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in the commercial fisheries in Homer and Halibut Cove. The hatcheries in Alaska and Lower Cook Inlet provide jobs and livelihood for myself along with many of my family and friends. I have been a seiner for 11 years, starting in Lower Cook and moving to the sound in recent years. I am strongly opposed to Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

Department Oversight: The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

Sincerely,  
Brooke Poirot



Halibut Cove/Homer, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm from Juneau, and I participate in the commercial, sport, and public use fisheries. I strongly oppose Proposal 43. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

Sincerely,  
Chad Poppe



Juneau, Alaska



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

November 13, 2023

Alaska Department of Fish and Game  
Boards Support Section



Submitted via online comment form and email: [REDACTED]

**RE: PWSAC opposes Proposals 35, 36, and 43**

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region’s serious financial distress following several years of low salmon abundance. Today, PWSAC is Alaska’s largest hatchery organization, employing 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors.

**Proposal 35 – AAC The Kachemak Bay Wild Fish Priority Management Plan**

Proposal 35 seeks to add unnecessary regulation in an area where ADF&G already has clear regulatory framework to manage for both wild and hatchery-produced salmon.

The department currently has 5 AAC 39.222 *Policy for the management of sustainable salmon fisheries* developed and adopted by the board in 2000. Additionally, CIAA works collaboratively with the ADF&G fisheries managers and scientists annually regarding the impacts of salmon enhancement through the Regional Planning Team (RPT), Annual Management Plans, and the permitting process established in regulation. Hatchery interactions with other salmon species are carefully considered annually as new information is available. Regular and continued periodic evaluation is conducted for consistency with statewide policies and regulations, focusing on the protection of naturally spawning wild salmon, genetics, fish health, and disease. This model has been and remains an enviable model of sustainable fisheries unparalleled anywhere in the world.

PWSAC understands and believes ADF&G currently has the tools necessary to reduce harvest of natural salmon should the department determine it necessary to protect Kachemak Bay wild salmon stocks. This is why **PWSAC opposes Proposal 35.**

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





### **Proposal 36 - 5 AAC 36.372 Tutka Bay Lagoon Salmon Hatchery Management Plan**

Proposal 36 seeks to stipulate a set percentage of enhanced salmon returns be provided to the common property.

The *Tutka Bay Lagoon Salmon Hatchery Management Plan* has no requirement mandating that a percent of their salmon be harvested in common property fisheries.

CIAA cost recovery goals and activities are developed annually by the hatchery operator and approved by the department. The department then works with CIAA to employ management strategies within waters of the Tutka Bay SHA, as well as other hatchery subdistricts listed in 5 AAC 21.372 *Tutka Bay Lagoon Salmon Hatchery Management Plan* to ensure achievement of broodstock and cost recovery goals and manage common property fish surplus to hatchery needs.

The BOF setting a rigid percentage of fish available to cost recovery or common property fisheries usurps aquaculture association boards fiscal and fiduciary responsibility to ratify annual operating budgets and corresponding cost recovery goals. **PWSAC strongly opposes Proposal 36.**

### **Proposal 43 –5 AAC 40.820. Basic Management Plan**

Proposal 43 looks to reduce hatchery production to 25% of the year 2000 production by amending the *Cook Inlet Salmon Enhancement Allocation Plan*. This proposal has also been copied and submit as Proposal 59 for the 2024 Kodiak meeting demonstrating clear intent to apply this statewide if adopted at a regional level.

This proposal in similar form has asked the board to reduce hatchery eggtakes on at least three other occasions. With unsubstantiated claims, each time the board has rejected the proposal that would dramatically affect fishermen's small businesses, families, as well as sport, subsistence, and personal use programs across large regions of Alaska.

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

Proposal 54 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend the PWS Management and

Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 94 opposed)**

Proposal 55 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

The assertion of over-production of hatchery fish is not supported by Ruggerone and Irvine (2018) or the North Pacific Anadromous Fish Commission who provides the best available data on numbers and biomass of hatchery

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

P. [REDACTED] F. [REDACTED]



and natural origin adult (mature) and juvenile (immature) salmon. PWS pink production for example has been relatively stable since 1990, 30+ years. Estimates for the years 1990-2015, PWS adult and juvenile hatchery pink salmon biomass average 7.32% of the total pink salmon biomass in the North Pacific Ocean. When the adult and juvenile chum and sockeye salmon biomass are included for the same timeframe, PWS adult and juvenile hatchery pink salmon biomass is estimated to average 1.62% of the annual total biomass for these three salmon species in the North Pacific Ocean. The vast majority of pink salmon in the ocean at any given time are of natural origin.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. PWSAC also supports the iterative process involving department staff, hatchery operators, and stakeholders. In the absence of compelling data or analysis supporting a reduction for conservation reasons, any significant changes need to be thoroughly examined by hatchery board members for hatchery needs and consider stakeholder input to ensure a well-informed decision.

Over the last 40 years the Alaska Salmon Hatchery Program has been a huge success in helping rebuild Alaska's salmon stocks from the historic lows of the 1970s. The program has provided hundreds of millions of dollars in economic activity across the state since its inception and fed billions of people across our globe.

It is important to note that hatchery associations, ADF&G staff, and BOF members have spent considerable time and money addressing repeat proposals. Author and word changes have not brought any new or substantive information to the table. There is no supporting data that suggests these repeat proposals would help the intended stakeholders but it is clear a proposal such as 43 would definitely hurt many more in the process.

PWSAC **opposes Proposals 35, 36, and 43** and would respectfully ask that **the board reject Proposals 35,36, and 43** any other request to reduce hatchery production. We look forward to working with Board of Fish members to answer any questions they have and help inform the public process during the meeting.

Sincerely,

Geoff Clark  
General Manager/CEO

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





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I port from Cordova, Alaska, and I commercial, sport, and subsistence fish. I strongly encourage you to oppose Proposal 43. I believe hatcheries help the overall economy of Alaska. They create jobs at the hatcheries. They increase fishing in areas where wild fish are not sufficient enough for the fishing fleets we have.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a



careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

Sincerely,  
Justin Ryan

[Redacted Signature]

Cordova, Alaska





## SALMON HATCHERIES FOR ALASKA

November 13, 2023

Alaska Board of Fisheries



Dear Members of the Alaska Board of Fisheries,

As advocates for Alaska's hatchery programs and private nonprofit hatcheries, we express our unwavering support for the Cook Inlet Aquaculture Association (CIAA) and the invaluable programs these entities uphold for the entire southcentral region and its diverse user groups. We strongly urge the Board of Fisheries to reject **Proposals 34-36, 41, and 43** due to the potential harm to salmon fisheries and coastal economies across the southcentral region and the consequential decline in hatchery production that will result if these proposals were implemented.

The Alaska hatchery program is a testament to our commitment to increasing salmon abundance, enhancing fisheries, and safeguarding wild stocks. Fisheries enhancement projects, integral to our programs, are rigorously evaluated and permitted by the Department of Fish & Game to ensure minimal negative impact on natural production. We must recognize that our fisheries enhancement efforts aim to supplement, not replace or displace, natural production. The Alaska salmon hatchery program exemplifies one of the most successful public-private partnership models in Alaska's history. CIAA hatcheries serve as vital infrastructure that significantly benefits local communities, the economy, and harvesters.

In opposing Proposal 43, we echo the concerns raised by the Department of Fish and Game, emphasizing key points that warrant the Board's careful consideration:

**Regulatory Authority:** The Board's limited authority over hatchery production must be exercised judiciously, considering the nuanced statutory framework and the department's primary role in permitting and regulating hatchery operations.



**Iterative Process:** The established iterative process involving department staff, hatchery operators, and stakeholders ensures that hatchery egg take levels are carefully determined, reflecting a balanced approach that safeguards wild salmon stocks.

**Conservation Concerns:** The proposal lacks demonstrated conservation benefits and may disrupt the delicate balance between hatchery production and the conservation goals crucial for the region.

**Department Oversight:** The Commissioner's directive since 2019 exemplifies proactive departmental oversight, indicating a commitment to maintaining equilibrium between hatchery production and conservation goals.

**Lack of Evidence:** The absence of compelling evidence supporting the proposed reduction in permitted pink salmon egg take levels raises questions about the basis and potential impact of the proposal.

**Historical Production Levels:** Historical context underscores that the proposed reduction to 25% would significantly limit hatchery operators' ability to meet production potential without clear conservation benefits. Adopting proposal 43 would reduce CIAA pink salmon egg takes by 75%.

**Comprehensive Planning:** Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations.

**Public Input and Participation:** The transparency in the hatchery permitting process, including public input through hearings and comment periods, underscores the importance of well-informed decision-making.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks a clear link to the well-being of wild salmon stocks.

**Department's Opposition:** The Department of Fish and Game opposes the proposal, citing the lack of evidence supporting the reduction in permitted pink salmon egg take levels and emphasizing the importance of a well-founded decision-making process.

In conclusion, we implore the Board to consider the collective voices of stakeholders, including those deeply invested in Alaska's hatchery program. The decisions made at this juncture hold far-reaching implications for the sustainable management of our fisheries, the well-being of diverse user groups, and the continued success of the Alaska salmon hatchery program.

Thank you for your attention to this critical matter, and we trust that your decisions will reflect a commitment to the responsible and sustainable management of Alaska's invaluable fisheries and support the vital role Alaska's hatchery programs play in our fisheries. We are reaching out to each of you this month before the board meeting in Homer to offer our time to meet, discuss, and answer any questions you might have.

Sincerely,



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Dean Day  
Executive Director  
Cook Inlet Aquaculture Association



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Tina Fairbanks  
Executive Director  
Kodiak Regional Aquaculture Association



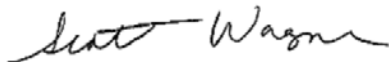
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Mike H. Wells  
Executive Director  
Valdez Fisheries Development Association, Inc.



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Geoff Clark  
Interim General Manager  
Prince William Sound Aquaculture Association



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Scott Wagner  
General Manager  
Northern Southeast Regional Aquaculture Assoc.



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Susan Doherty  
General Manager  
Southern Southeast Regional Aquaculture Assoc.



November 13, 2023

Mr. John Wood, Chairman  
Alaska Board of Fisheries  
Boards Support Section

RE: Silver Bay Seafoods Comments on Proposal 43

Dear Chairman Wood and Board of Fisheries Members:

Silver Bay Seafoods is a vertically integrated, fishermen-owned seafood processing company with several operations throughout Alaska. Silver Bay's operations in Southeast, Prince William Sound and Kodiak in particular benefit greatly from the fishery enhancement programs, as do their communities and residents. **We oppose proposal 43.**

We support Alaska's outstanding hatchery program, which is rooted in strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations. This program has demonstrated nearly 50 years of sustainable enhanced production to supplement our wild stocks, providing economic opportunity and food security to all users. A [McDowell Group report](#) identifies the economic contribution in 2018 of Alaska's salmon hatcheries to be 4,700 jobs, \$218 million in labor income, and \$600 million in total economic output.

Hatchery production is managed through a rigorous public permitting process which involves many stakeholders and Alaska Department of Fish and Game (ADF&G) experts from multiple disciplines. ADF&G opposes proposal 43 on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

Significant investments have been made in Alaska's salmon hatchery program and associated research to provide for sustainable salmon harvests and to bolster the economies of coastal communities while maintaining a wild stock priority. In particular, the work of the Alaska Hatchery Research Project continues to provide information to show how these enhanced stocks interact with wild salmon. The team of scientists collaborating on this project are well



respected and have broad experience in salmon enhancement, management, and wild and hatchery interactions. The science is extensive, so thorough that there wasn't enough time for it to all be presented during the recent hatchery committee meeting in October. The proposal's focus on reducing hatchery production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

We ask you to continue to support the existing public RPT process and to work with the hatchery community, ADF&G, and industry leaders to further your understanding of the importance of the Alaska salmon hatchery program to all Alaskans.

Respectfully,

A handwritten signature in blue ink that reads "Abby Fredrick".

Abby Fredrick



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm from Sitka, and I strongly oppose Proposal 43. As a life long commercial fisherman in the SE region, I can testify to the ever increasing importance of hatcheries to our local salmon fisheries. Over the last 2 decades, the hatchery produced component of our salmon catch has brought a much needed increase in ex vessel volume/income. As more of our wild runs are diminished by the combined forces of habitat degradation and climate change, hatcheries provide the only path to economic stability in virtually all of our fisheries here in SE.

Sincerely,  
John Skeele



Sitka, Alaska

November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in sport and subsistence fisheries in Valdez and the Prince William Sound. I strongly oppose Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Jason Smilie



Valdez, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate extensively in the Cordova fisheries, from commercial, sport, subsistence, and public use fisheries to seafood retail. I oppose Proposal 43. Without these hatcheries and others like them, our fisheries die, then our oceans die, then the economy, then eventually we die in the end. It's important to supplement fish to sustain a healthy population for fisheries to continue.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

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demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

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**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Mackenzie Smith  
Cordova, Alaska



Email: [REDACTED]

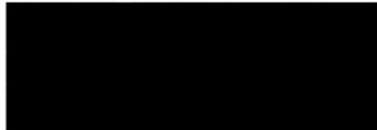
Cell Phone: [REDACTED]

Fax: [REDACTED]

Website: <http://www.seafa.org>

November 13, 2023

Alaska Board of Fisheries  
Alaska Board Support



Submitted via Board of Fish electronic portal

RE: Comments for the Lower Cook Inlet Board of Fish Meeting

Dear Chairman Wood and Board Members,

Thank you for this opportunity to comment on behalf of the membership of Southeast Alaska Fishermen's Alliance (SEAFa). We represent our approximately 325 members involved in Southeast Alaska salmon (gillnet, troll, & seine) crab, shrimp and longline fisheries, halibut & sablefish fisheries in the Gulf of Alaska and some of our members are involved in the gillnet fishery in Prince William Sound.

**PROPOSALS 34, 35, 36, & 43 OPPOSE**

SEAFa opposes these 6 anti-hatchery proposals that are trying to undermine the Alaska Hatchery system. While the proposals are specific for the most part to Cook Inlet Aquaculture Association (CIAA) programs the intent is to set a precedent to undo the hatchery programs. The hatchery program has a robust public process through ADF&G internal review, the Regional Planning Teams, the regional Comprehensive Salmon Plans, annual reviews and reports. Implementation of these proposals would likely hamper the Departments ability to effectively manage both hatchery and wild stock returns and impair the ability of private non-profit hatchery association to retain adequate stocks to meet program goals to fund the programs, maintain broodstock and provide significant opportunity to users of the resource. Hatchery programs provide an important need to focus effort on hatchery stocks and minimizing effort on wild stocks that are in need of protection, are considered a stock of concern. Wild stocks labeled stocks of concern have associated action plans which take into account the flexibility of protecting one stock but still providing fishing opportunities on the enhanced stocks.



**Proposal #34 & #35 OPPOSE:** These two proposals are opposed by ADF&G, are similar to ones submitted and considered last year during the Prince William Sound meeting. The Department believes the *Policy for the Management of Mixed Stock Fisheries* and the *Policy for the Management of Sustainable Salmon Fisheries* provides the Department with appropriate guidance as well as any Stock of Concern action plans in the area.

**Proposal #36 OPPOSE:** This proposal seeks to limit the amount of cost recovery at one site, this undermines a commonly used method to take a high amount of cost recovery in one spot, leaving other areas for common property fishing opportunities. There are currently policies and regulations in place providing authority for hatchery operators to determine cost recovery goals. These goals are sometimes listed in the Comprehensive Salmon Plans as well as in the Annual Management Plan that is agreed upon yearly by the operator and ADF&G. In addition, there is a regulation that states once hatchery salmon enter the Special Harvest Area they are no longer subject to common use and no longer available exclusively to the common property fishery.

**Proposal #43 OPPOSE:** SEAFa opposes this proposal. A version of this proposal has come before the board every cycle for awhile now and still does not present any compelling evidence for the need to limit hatchery permitted levels. The ADF&G staff comments (RC2) has an excerpt from the Dept of Law that points out that the Board of Fish most likely does not have this authority but the authority rests with the Commissioner of ADF&G to fundamentally change hatchery production levels. Hatcheries are permitted through a public iterative process involving the public, hatchery operators and ADF&G. The proposal does not provide any compelling or scientific evidence to justify the reduction of hatchery production (pink salmon in this proposal). We continue to oppose this attempt to have the Board of Fish circumvent the comprehensive planning, public input and participation in the hatchery permitting process and the ability for the Commissioner to act in the face of conservation concerns.

#### **PROPOSALS 257, 258 & 259 SUPPORT:**

SEAFa supported accepting ACR 11, now proposal #257 and ACR 13, now Proposal #259 at the October work-session. Proposal #257 and Proposal #258 are both addressing the changes necessary to update the *Southeast Alaska King Salmon Management Plan*. While it is necessary to update the plan based on changes to the Pacific Salmon Treaty, it is difficult to determine if there is unconditional support for ADF&G's proposal #257 since they are planning to submit an RC with further regulatory language.

Proposal #259 would amend the *Southeast Alaska King Salmon Management Plan* and address the change that occurred when the wording “sport fishery” was dropped in the writing of the regulation. This significantly changed the intent of the agreement that was reached at the SE Board of Fish meeting in 2022, between the Alaska Troller Association, Territorial Sportsmen and Southeast Alaska Guides Organization working with Board Member Mitchell. This agreement was submitted as RC 178 that was agreed upon and adopted by the Board of Fish. This agreement ([RC178](#)) used typical method of marking new text bold and underlined and [IN CAPITAL] language to be deleted. The language that was in RC 178 5 AAC 47.055 (b) and the previous regulation was “(2) allow uninterrupted sport fishing in salt waters for king salmon, while not exceeding the sport fishery harvest ceiling:”, section (b)(2) was not changed by being bold and underlined nor was it specifically addressed in staff comments as it was not one of the changes being made or agreed upon. When the regulations were actually published the words “sport fishery” was removed so it now reads 5AAC 47.055 (b)(2) “allow uninterrupted sport fishing in salt waters for king salmon, while not exceeding the harvest ceiling;” which has a different meaning.

**PRINCE WILLIAM SOUND ROCKFISH CONSERVATION EMERGENCY PETITION  
ADOPTED BY THE BOARD AT THE OCTOBER WORKSESSION**

We understand that the Board of Fish might be considering a board generated proposal to adopt a permanent regulation during this cycle. We believe that a better route would be to wait until next year during the regular Board of Fish cycle for consideration of this proposal and in the meantime adopt a work group to look into rock fish conservation.

Sincerely,



Kathy Hansen  
Executive Director



SSRAA  
Southern Southeast Regional Aquaculture Association, Inc.

[Redacted]  
P: [Redacted] F: [Redacted]

November 14, 2023

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**RE: Proposal 43 - 5 AAC 40.820. Basic Management Plan**

Chairman John Wood, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments for proposals submitted to the Alaska Board of Fisheries (BOF) at the 2023 Lower Cook Inlet Finfish meeting. The Southern Southeast Regional Aquaculture Association (SSRAA) respectfully provides the following comments for the board's consideration **in opposition to Proposal 43.**

[Proposal 43 -5 AAC 40.820. Basic Management Plan](#)

The language in this proposal to cap the pink salmon production at 58.75 million eggs, is essentially the same as a 75% reduction of 2000 level. Because a similar proposal has been submitted for the 2024 Kodiak meeting (Proposal 59), but for ALL hatchery production, SSRAA is compelled to respond to this proposal as it is a stepping stone to affecting all hatcheries.

Similar proposals have been submitted numerous times in various forms, and have been repeatedly rejected by the Board and the public; ACR2 (October 2018 BOF Work Session), Proposals 54 and 55 (December 2021 PWS/Upper copper/Upper Susitna Finfish/Shellfish meeting).

For hatchery operators to continually have to address the same unsubstantiated claims is frustrating and a waste of resources and time; not only the operators, but for ADF&G and the BOF. The process for permitting hatcheries and their production has numerous opportunities for input and debate prior to the Commissioner granting authorization. To use such arbitrary numbers to assign as production is not only short-sighted, it is arrogant, and a slap in the face to the numerous stakeholders, agencies, and processes that thoroughly vet and regulate hatchery production.

SSRAA would like to thank the Board of Fisheries for the opportunity to provide comment on this proposal, and we would respectfully request that **the board reject Proposals 43, and any other request to reduce hatchery production.**

Respectfully,

General Manager



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial, sport, and public use fishing in Homer. I am strongly opposed to Proposal 43. Hatcheries provide healthy food, jobs, sporting opportunities, fish tax, tourism, local industry, omega 3, and lots of other positive things.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

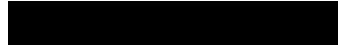
**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.



Risk to Wild Salmon Stocks: The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Ivan Stonorov



Homer, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I participate in commercial fishing in Homer and Whittier, and I strongly oppose Proposal 43. Reducing the hatcheries will impair every user group. Alaska/everyone should be supporting our beautiful and world-leading hatcheries.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.



**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,

Jordan Stover

[REDACTED]

Homer/Whittier, Alaska



**Submitted by:** Jim Stubbs

**Community of Residence:** Anchorage, Alaska

**Comment:**

I will be commenting on: Proposals 13,14,15,16 & 17

Proposal 1: Oppose

Proposal 2: Oppose

Proposal 3: Oppose

Proposal 4: Support

Proposal 5: Support

Proposal 6: Support

Proposal 7: Support

Proposal 8: Oppose

Proposal 9: Oppose

Proposal 10: Oppose

Proposal 11: Support

Proposal 12: Support

Proposal 13: Support

Proposal 14: Support

Proposal 15: Support

Proposal 16: Support

Proposal 17: Support



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm a part of commercial and sport fisheries, seafood processing and retail, and charter guides in Ketchikan, Alaska. I stand against Proposal 43.

Although the current proposal before the BOF speaks specifically about hatcheries in the Lower Cook Inlet, there is a growing group of people who would like to see Alaskan hatcheries disappear and see Cook Inlet as the place to start making that happen. Commercial, sport and subsistence fisheries now heavily depend on hatchery production. Over the years, many anti-hatchery proposals have been submitted to the BOF and up to now, have not received serious consideration by the BOF. If the BOF is inclined to drastically alter its direction regarding salmon enhancement, additional time and energy should be invested in the public process to ensure that stakeholders are a) aware of the Board's desire to make a major shift in direction; and b) allow adequate vetting of the consequences of such action. I used to sit on the school board and major policy changes received two readings (i.e. the first reading to notice the public of a potential shift in policy direction and the second reading to provide ample opportunity for the public to comment.)

I encourage the Board to oppose Proposal 43, but if there are merits to the proposal that the Board feels inclined to take action on, I would encourage the Board to widen the scope of its public outreach and be proactive in soliciting additional input before a final decision is made.

Thank you for your consideration and service as part of the Board of Fish.

Sincerely,

Russell Thomas



Ketchikan, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm from Cordova, Alaska, and I strongly oppose Proposal 43. We rely on salmon hatcheries in the Prince William Sound for our livelihood and to feed our family. We are just one of many families that make their living commercial fishing for hatchery salmon across the state of Alaska. Hatchery salmon are also integral to personal use, subsistence, and sport fishing interests around the state. If you decrease hatchery production, all user groups suffer the consequences and will see a dramatic reduction in salmon available to them.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a



permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Malani Towle  
Cordova, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I port from Whittier, Alaska, and I participate in commercial, sport, and subsistence fishing, I am strongly opposed to Proposal 43.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Nathan Tueller



Whittier, Alaska





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I'm part of the commercial and sport fisheries in Homer, Alaska, and I strongly oppose Proposal 43. Hatcheries are crucial to helping our salmon runs and harvests more consistent returns. More consistent returns benefit everyone in the communities surrounding the hatcheries, from sports fishermen, to commercial fisherman, to fish processing plants, to all the businesses that provide services to those groups.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a



demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

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**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Colten Tutt  
Homer, Alaska



# UNITED FISHERMEN OF ALASKA

November 13, 2023

Alaska Board of Fisheries  
[REDACTED]

Doug Vincent-Lang, Commissioner  
Alaska Department of Fish and Game  
[REDACTED]

Re: Lower Cook Inlet- Commercial Salmon- **OPPOSE Proposals 34, 35, 36 and 43**

Chair Wood, Board Members, and Commissioner Vincent-Lang:

United Fishermen of Alaska is the oldest and largest trade organization for commercial fishermen in the State of Alaska. UFA has engaged with the Alaska Department of Fish and Game (ADF&G), the State Legislature, and the Alaska Board of Fisheries (Board) regarding Alaska's hatchery programs for more than 40 years. Alaska's hatchery program is a world-class example of conservative and strategic integration of enhanced stocks with wild stocks.

Alaska's hatchery program is regularly evaluated and reviewed in periodic program evaluations for each association by ADF&G, undergoes permit review and annual reporting, and is subject to public process through the Regional Planning Team process and Comprehensive Salmon Plan updates in each region. Additionally, the hatchery associations have supported ongoing studies related to straying and genetics which will help ADF&G and the regional planning teams assess whether programmatic changes are necessary (note that the studies are currently ongoing and final results are not yet available). The best time for these hatchery programmatic discussions is at the Board's Hatchery Committee meeting and during the Board's statewide meeting based on completed studies and known scientific information.

The proposals targeting hatchery programs for the Lower Cook Inlet meeting are unnecessary, do not propose useful improvement to regulations, and in some cases are simply repetitive. In addition, implementing some of these proposals would likely hamper ADF&G's ability to effectively manage both hatchery and wild stock returns, and would impair the ability of the aquaculture association to achieve operational goals and/or provide funding for hatchery production, evaluation efforts, and non-production programs. **Therefore, UFA opposes proposals 34, 35, 36, and 43.**

- Proposal 34 seeks to create a *Kamishak Bay Purse Seine Fishery Management Plan* to structure guidelines in regulation to ensure wild fish priority in mixed stock fisheries to surrounding river



systems.” This proposal offers no specific regulatory change, would achieve no improvement on existing regulation, and fails to recognize existing policies which guide fisheries management for the prioritization of wild stocks. This proposal and Proposal 35 mirror proposals already rejected by the Board during the 2021 Prince William Sound meeting in Cordova.

- Proposal 35 asks the Board to create a *Kachemak Bay Wild Fish Priority Management Plan*. The proposer provides no clear rationale or framework and fails to acknowledge existing policies and guidance that already establish priority for wild stocks. Furthermore, creation of any such plan would not likely change management of the enhanced fisheries in Kachemak Bay.
- Proposal 36 seeks to limit the proportion of returning adult hatchery salmon that may be harvested within the Tutka Bay Lagoon Hatchery Special Harvest Area for cost recovery by Cook Inlet Aquaculture Association. To meet fiduciary obligations, aquaculture association boards require flexibility to select and prioritize cost recovery opportunities for the organization. These decisions usually vary over time, and the inability to meet financial objectives due to the proposal language could lead to funding shortfalls for projects that are not centered on commercial production. These projects include personal use, sport and subsistence projects (China Poot, Resurrection Bay, etc.) as well as research, habitat monitoring/improvement, and work on invasive species investigation/management (elodea, pike, etc.). It is not uncommon for one project or return to bear a greater proportion of an association’s operational expenses; and that proportion in a given year can vary widely based on price, average weight, and magnitude of return.
- UFA opposes Proposal 43. UFA opposed this proposal at the Board’s Work Session in 2018 (where it appeared as ACR2) and at the Prince William Sound meeting in 2021 (where is appeared as Proposal 55). UFA opposes Proposal 43 for the same reasons it opposed the previous proposals aimed at the same end. There is no definitive record to support the contentions in Proposal 43, and aquaculture associations have been outspoken in their opposition to all iterations of this proposal and clearly articulated the devastating impacts it would have on all of the hatchery programs state-wide.

The Board has consistently continued to defer decision-making and oversight of hatchery programs to the Commissioner and ADF&G. UFA encourages the Board to continue in this vein by rejecting Proposals 34, 35, 36, and 43.

Thank you for your consideration of UFA’s comments regarding changes to hatchery management plans, operational decision-making and production. We look forward to continued dialog and learning opportunities for the Board and public at future meetings of the Board’s hatchery committee.

Regards,

Matt Alward  
President

Tracy Welch  
Executive Director

**MEMBER ORGANIZATIONS**

- Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association  
 Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association  
 Bristol Bay Regional Seafood Development 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 • Fishing Vessel Owners  
 Assn • 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 • Northwest Setnetters 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 Catcher Boats • United Southeast Alaska Gillnetters  
 Valdez Fisheries Development Association



# UNITED SOUTHEAST ALASKA GILLNETTERS

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

## On Time Comments Board of Fisheries Lower Cook Inlet 2023

Proposal 34- **Oppose.** The 2016 McNeil River Stock of Concern Action Plan, Management of Mixed Stock Fisheries, and the Policy for the Management of Sustainable Salmon Fisheries, are adequate tools to achieve established escapement goals. The department has shown a propensity in the past to exceed proposed action in Action Plans should it be necessary to achieve escapement goals.

Proposal 35- **Oppose.** We are of the opinion that ADFG has the tools necessary to successfully manage for wild stocks, which, in our experience, has always been their priority. We would also note that since this proposal does not contain specific measures to be undertaken, it would likely not change current management, given that wild fish are the priority.

Proposal 36- **Oppose.** This proposal would likely result in CIAA being unable to meet broodstock and cost recovery goals, which, over time, would reduce the amount of common property fish available in the fishery, thereby reducing its value to both the industry and the state.

Proposal 41- **Oppose.** We feel that if there is a necessity to closed area in Tutka Bay, the area closed should be in consultation with ADFG and stakeholders.

Proposal 43- **Oppose.** We think that any alteration to any hatchery permit should be subject to the public process in place at the Regional Planning Team, to discuss the scientifically sound benefits or detriments of any particular alteration, for consideration by the Commissioner of Fish and Game. As you know by now, there is some question as to the Board of Fisheries authority regarding hatchery permits and/or altering them. Board of Fisheries action on this proposal could set a precedence that would require BOF review of all permits in the state, usurping the RPT process. RPT's meet twice annually, while BOF meets once every three years per region. This would make for longer or



more meetings than are currently scheduled. It's our perception that the BOF has enough on its plate allocating fisheries resources and should leave permitting to the current process.

United Southeast Alaska Gillnetters is a non-profit fishery advocacy group dedicated to the preservation and economic viability of the SEAK drift gillnet fishery. We appreciate the opportunity to comment.

Respectfully,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch, Executive Director

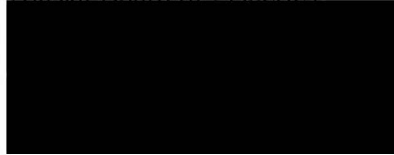




[REDACTED]

November 12, 2023

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries



RE: Proposal 35 – 5 AAC 21.XXX The Kachemak Bay Wild Fish Priority Management Plan  
RE: Proposal 36 – 5 AAC 36.372 Tutka Bay Lagoon Salmon Hatchery Management Plan  
RE: Proposal 43 – 5 AAC 40.820. Basic Management Plan

Chairman John Wood, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments for proposals submitted to the Alaska Board of Fisheries (BOF) at the 2023 Lower Cook Inlet Finfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) respectfully provides the following comments for the board's consideration **in opposition to Proposals 35, 36, and 43:**

**Proposal 35 – 5 AAC The Kachemak Bay Wild Fish Priority Management Plan**

Proposal 35 seeks to create a wild fish priority management plan for Kachemak Bay salmon because of the author's perception that existing conservation structures do not adequately protect them. Alaska's natural salmon resources have guaranteed priority by the *Alaska Constitution Article VIII, Section 4*, mandating management of all wild salmon under the sustained yield principal. Other directives, such as *5 AAC 39.222 Policy for Sustainable Salmon Fisheries* and *5 AAC 39.220 Policy for the Management of Mixed Stock Fisheries*, provide strong guidelines to further buttress this constitutional mandate. In addition, the Alaska Department of Fish and Game (ADF&G) has broad regulatory authority to set time and area restrictions to further reduce the harvest of wild salmon in common property and cost recovery fisheries to ensure escapement as necessary.

The author espouses that because some measure of wild stocks are harvested in LCI common property and hatchery cost recovery fisheries, it justifies the need for an area specific conservation plan. Interceptions of wild salmon are common in mixed stock fisheries throughout the state, and this factor is managed quite effectively by ADF&G in-season to ensure escapement goals are met. It should be noted that neither pink, chum, or sockeye salmon stocks are currently recommended as a stock of concern for Kachemak Bay as stated in the *ADF&G Memorandum on LCI Stock of Concern Recommendations (September 20, 2023)*.

VFDA does not support the creation of area specific conservation plans that create additional and unnecessary regulation. We feel strongly that ADF&G currently has the tools necessary to reduce the harvest of natural salmon should ADF&G determine it necessary to protect Kachemak Bay wild salmon stocks. **For these reasons, VFDA opposes Proposal 35.**

**Proposal 36 - 5 AAC 36.372 Tutka Bay Lagoon Salmon Hatchery Management Plan**

Proposal 36 seeks to insert the following language into 5 AAC 21.372 which would stipulate Cook Inlet Aquaculture Association:

*“produce revenues from the harvest and sale of returning fish that are at least equal to the costs of hatchery operation and operate efficiently so that at least 50% of the fish are harvestable by common property fisheries”*



VFDA does not support the promulgation of regulation within individual hatchery management plans that stipulate a set percentage of enhanced salmon returns be provided to the common property. Variabilities in returns, budgets, and prices that associations receive for cost recovery sales do not lend themselves to rigid contribution mandates. If adopted as written, Proposal 36 will have a destabilizing effect on CIAA. The process by which annual operating budgets and corresponding cost recovery goals are set is an internal process best left to the boards of directors of individual hatchery associations and not the BOF. In addition, the submission of Annual Management Plans to Regional Planning Teams provides opportunity for comment by the public and various user groups on hatchery production, financial plans, and efficiency of operations.

Adoption of Proposal 36 would set a dangerous precedent by which the financial requirements of an aquaculture association would be subjected to the political process of the BOF every three years. This action would effectively usurp the fiduciary role of aquaculture association boards. **For these reasons, VFDA opposes Proposal 36.**

### **Proposal 43 –5 AAC 40.820. Basic Management Plan**

As submitted, this proposal would apply to the *Cook Inlet Salmon Enhancement Allocation Plan*, capping pink salmon production to 25% of 2000 levels. This is not a 25% reduction from current permitted capacities, but a 75% reduction. Because it has been copied and submitted as Proposal 59 for the 2024 Kodiak meeting, it most assuredly is intended to be applied to all Alaska's hatchery permits statewide if adopted on a regional level.

The intent and principals of Proposal 43, which requests the reduction of hatchery egg take permits by direct board action, have been submitted similarly as ACR's and proposals to the board at least three times prior. Each time they have been soundly rejected by the board as shown:

**ACR 2** – Submitted by Virgil Umphenour at the October 2018 BOF Work Session. Sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

**Proposal 54** – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting. Sought to amend the PWS Management and Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 95 opposed)**

**Proposal 55** – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting. Sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

The Fairbanks AC has now resubmitted these same failed proposals in the 2023/2024 board cycle. Nothing has changed, other than the author of the proposal. Proposal 43 continues to rely on an unsubstantiated claim of an agreement by the hatchery operators to reduce hatchery production. The proposers have not provided any record of any such agreement showing hatchery operators agreeing to these draconian measures.

The blanket statements of overproduction, and the impacts of hatchery pink salmon on the marine environment, are unsubstantiated as well. As before, the proposer provides no new scientific evidence to support these claims and fails to recognize that pink salmon egg takes of Cook Inlet hatcheries are currently under permitted capacities for recent years. Prince William Sound hatchery production of pink salmon, the largest in the state, has remained relatively stable for decades, experiences strong returns of natural pink and other species of salmon and consistently achieves required escapement goals. Production of hatchery pink salmon equates to approximately 15% of the overall abundance of pink salmon in the North Pacific, using



data provided by the North Pacific Anadromous Fish Commission. The vast majority of pink salmon the ocean are of natural origin.



Adoption of Proposal 43 will cause significant harm to CIAA, capping its pink salmon production at levels that are unsustainable; this will likely have an effect on not just the commercial fisheries, but sport, subsistence, and personal use as programs for other species dry up for lack of funding. As ADF&G stated in *ADF&G RIR No. 5J23-06 Staff Comments* on the proposal, this reduction of permitted capacity,

*“ .... is not likely to result in improved productivity of western Alaska or Cook Inlet salmon stocks.”*

I would respectfully point out that hatchery operators have spent considerable time and money addressing these short-sighted attempts to reduce hatchery production and damage Alaska’s economy. The BOF and ADF&G have also spent considerable resources addressing and deliberating these matters, most recently at the 2021 PWS Finfish meeting where the proposer failed to submit public comment or attend in support of their proposals.

**For these reasons and for reasons stated in our many comments submitted over the years for proposals of this nature, VFDA is opposed to Proposal 43 and we strongly urge the board to reject it.**

VFDA opposes these proposals because of the potential they have to create unnecessary regulation and significantly harm not only Cook Inlet hatcheries, but other salmon enhancement programs statewide. The State of Alaska has invested heavily in its hatchery programs through its fisheries enhancement loan program and has a vested interest in the long-term viability of our programs and the benefits fisheries enhancement provide coastal communities and all that depend on them.

For decades, the BOF and the Commissioner of ADF&G have successfully managed Alaska’s hatcheries under two general principles; that the Board allocate returns of adult salmon and the Commissioner administer hatchery permits. This understanding has served Alaska and the resource well because authorizations for hatchery permits are rigorously vetted through robust analysis and sound scientific principles, both considering a wide range of effects.

The board’s previous and consistent decisions to deny requests to amend hatchery permits is proper and we urge this current Board of Fisheries to observe the historic record when considering repeated requests by the public for direct board intervention to limit or reduce hatchery production.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals. **We would respectfully request that the board reject Proposals 35, 36, 43, and any other request to reduce hatchery production.** Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike H. Wells".

Mike H. Wells  
Executive Director



**Submitted by:** Benjamin Van Alen

**Community of Residence:** JUNEAU

**Comment:**

I support the Lower Cook Inlet Proposals 34, 35, 36, 37, 41, 42, and 43.

I oppose Lower Cook Inlet Proposals 15 and 38.

Please think about the ecologic and economic impacts of Alaska’s salmon hatchery program.

Perhaps make an exhaustive list of all the ways hatchery salmon can help wild salmon. Or, make a list of all the locations in the world with healthy and sustainable harvests of wild and hatchery salmon.

If, and when, these lists prove too exhausting to make, take a breath, and your clean sheet of paper, and make a list of factors limiting the abundance of salmon, or, all critters for that matter.

You will recognize that: 1) the abundance of all biota is always limited by the carrying capacity not the numbers of young (i.e., seeds, eggs, babies); 2) the environment is already full of locally adapted biota; and 3) that the carrying capacity is sustained by the recycling of the nutrients from biotic wastes and decomposition.

In applying these “Laws of Ecological Sustainability” to salmon we recognize that it takes spawners to make spawners. That the production and productivity of wild salmon is maintained by their spawning and dying and fertilizing thousands of natal streams, lakes, rivers, and estuaries. Salmon abundance is limited more by the adult spawners that die than the poor egg-to-fry.

Now justify why Alaska’s hatchery industry should consume public resources to release billions of babies when Nature will make more adults for free? Why continue to allow billions of hatchery salmon to join in the ecosystem potluck without bringing a dish?

Since there is no such thing as a free lunch there is no ecologic or economic niche for hatchery salmon in the management of Alaska’s fisheries.

See attached pdf of a presentation titled “Wild, Natural, Sustainable... or Hatchery?” for more information on why hatchery releases should be reduced or curtailed.

Proposal 15: Oppose	Proposal 35: Support	Proposal 36: Support	Proposal 37: Support
Proposal 38: Oppose	Proposal 41: Support	Proposal 42: Support	Proposal 43: Support

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# Wild, Natural, Sustainable... or Hatchery?

Benjamin Van Alen [REDACTED]

Alaska AFS, Fairbanks, March 2023







# Question Everything

- Wild, Natural, Sustainable
- Hatcheries and Ecological Overshoot
- Recommendations
  - Close hatcheries
  - Maintain distribution and abundance of wild spawners and their habitats
- And, if time, some data and observations

# Correlation or Causation?



- Industrial hatchery introductions
- Declining runs:
  - Salmon
  - Herring
  - Eulachon
- Exceptions?
- Anywhere?

...and how can a hatchery fish help a wild one?

**Hatchery releases up**

**Wild & Hatchery down**

THE VOICE OF ALASKA'S CAPITAL SINCE 1912 WEDNESDAY, AUGUST 2, 2017  
**JUNEAU EMPIRE**  
WEATHER: Cloudy, 58-68, Wind: 10-15, Humidity: 60%  
ADVERTISING: 907-586-3100 FAX: 907-586-3101  
MAILING: 907-586-3100  
WWW.JUNAEUIEMPRE.COM

**BED TAX INCREASE** Proposal would raise city's bed tax to 10% from 8% to help pay for higher costs of services. **A3**

**FININGS ON TOURISM** Alaska doubles marketing funds in capital budget. **A3**

**'NOBODY IS SAFE'** Trump calls opioid deaths a big problem, but doesn't declare national crisis. **A4**

**July splits in jail riot case**  
Inmate found guilty of criminal mischief, not guilty of more serious riot charge

By MELISSA LARSEN  
L.A.S./E.M.

The first of four co-defendants in a prison riot case were found guilty of criminal mischief on Monday. The defendant, who was charged with rioting, was found guilty of criminal mischief on Monday. The defendant, who was charged with rioting, was found guilty of criminal mischief on Monday. The defendant, who was charged with rioting, was found guilty of criminal mischief on Monday.

Chum salmon attempt to swim up God Creek as thousands more wait their turn on Monday.

**King salmon fishing canceled**  
No restrictions of kings in Southeast protect record-low numbers in Golden North Derby

Fish and Game has announced that king salmon fishing in Southeast Alaska for the remainder of the summer because of record-low stock production. ADF&G announced in a Monday afternoon emergency order.

Fishermen will not be able to retain king salmon in any Southeast salt waters from Aug. 10-Sept. 30. The emergency order applies to both commercial and sport fishermen.

Fish and Game describes the regulations as "extreme management measures."

Many salmon stocks that contribute to the state's fisheries production will not meet escapement or management objectives in 2017, the agency says.

Fish and Game sets a guideline number, called an "escapement goal," of spawning king salmon.

Largely, the priority is preserving Chinook salmon for Southeast Alaska.

CHARLES C. SWANSON  
ADF&G Press Officer

SEE RPT | Page A5

SEE KINGS | Page A5



# Hatchery fish swim with wild fish and must...



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- increase competition
- decrease growth
- increase predation
- decrease survivals
- increase straying
- decrease fitness
- increase harvest pressure
- decrease management precision

## On **Wild** fish

You need to question  
Hatchery interaction?  
Only one ocean



Eli Sheakley, Hoonah Indian Association fisheries technician

# Hatchery "Ocean Ranching"



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...so what's Ecologically wrong with letting billions of super-sized hatchery fish swim **wild** each year?



# Ecology of Wild, Natural, Sustainable?



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- **Carrying capacity** limited
  - Already filled with
  - Locally adapted biota
- Competing/cooperating to survive to reproduce
- Before dying, **fertilizing**, and helping to sustain the

One (1) Earth

No open niche

Biodiversity

Fitness

Nature's Laws of Ecology?

For all biota?



# Abundance is limited by:



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- **Carrying capacity**  
(competition for space,  
water, food, and survival)

not

- **Reproductive capacity**  
(i.e., numbers of eggs or  
seeds)

for

- **All Biota**



Photo credit: Nooksack Salmon Enhancement Association

Carrying capacity,  
the kitchen not the bedroom,  
for every critter

It's the spawners that die, not the poor egg-to-fry



# Carrying Capacity

Want more sheep? Get a bigger, more productive, field



PC311





# To grow plants or animals we've had to...



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- **Control the Environment**

- Control/remove what is already there
- Grow locally adapted seed/stock
- Limit seeding/stocking rates
- Manage
  - Feed
  - Water
  - Medicate
  - Pests
  - Wastes
- Fertilize\*

\*Is reliance on synthetic fertilizers sustainable?





# We eat cultivated food\*

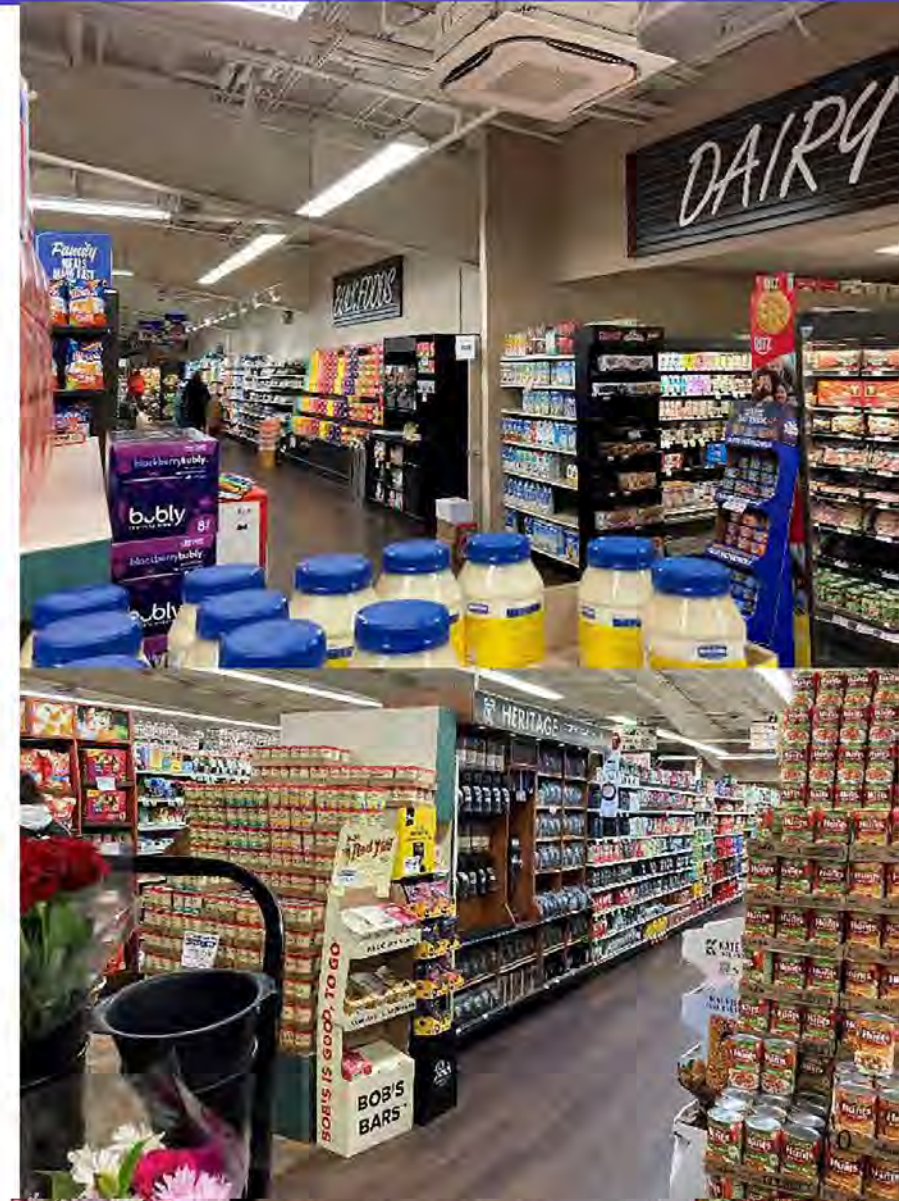


Definition:  
Agriculture/Aquaculture  
Breeding, rearing, and  
harvesting animals and plants  
in **controlled environments\*\***

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\*what nearly all 8 billion people on Earth  
mostly eat

\*\*the Mighty Pacific is not a "controlled  
environment"



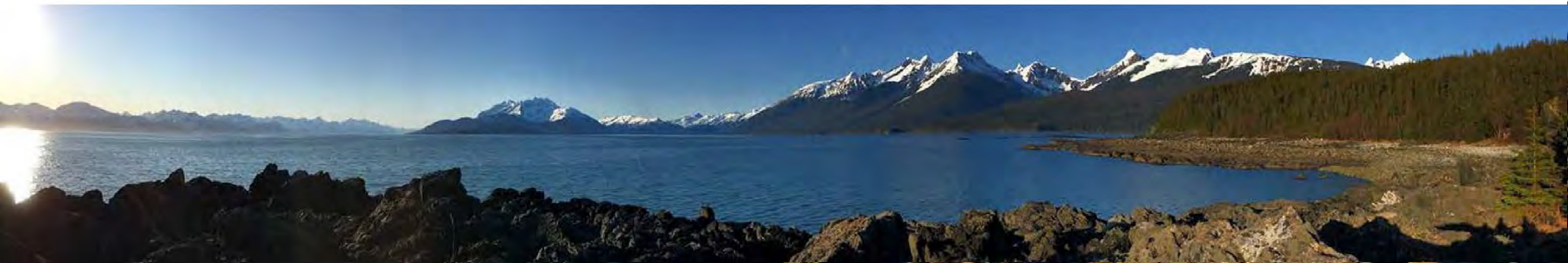


# Nature, Human Nature, and Hatcheries



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- The **Ocean is Nature** (a wild and **uncontrolled** environment)
- Why assume:
  - A huge open niche for billions of hatchery babies?
  - Simply release more to harvest more?
  - Hatchery production, not, wild reduction?
  - Can get something for nothing?
  - Because the Ocean is big and complicated?



# We can fill the carrying capacity



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- With wild fish  
or
- Hatchery fish  
BUT
- It is the **nutrient cycling** of wild fish that helps maintain the carrying capacity

Wild fish are  
dying for more



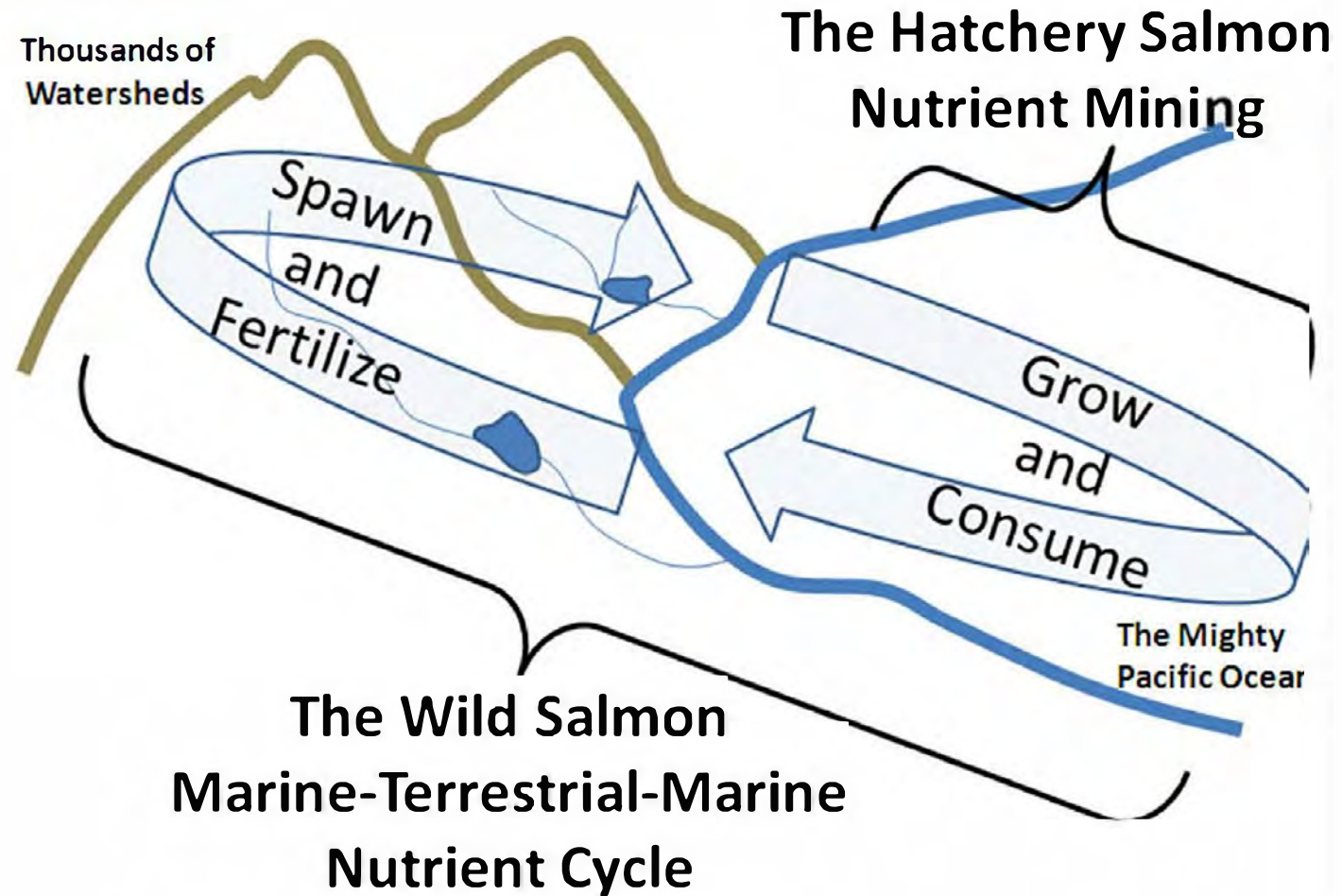
Eli again, 10-years later



# Hatchery Nutrient Mining



- The put-and-take of hatcheries
- Directly mines nutrients
- Lowers carrying capacity
- Early marine survival bottleneck?



# Ecological Overshoot (and collapse)



## Biota using ecosystem resources faster than they are being recycled

- i.e., Open Ranching or Ocean Ranching
  - the grazing of introduced animals that mine more nutrients than they recycle
- Where has this proven
  - Sustainable?, Ecological?, Profitable?

We have allowed hatchery fish to elbow their way into the ecosystem potluck without bringing a dish



# The unsustainable problem

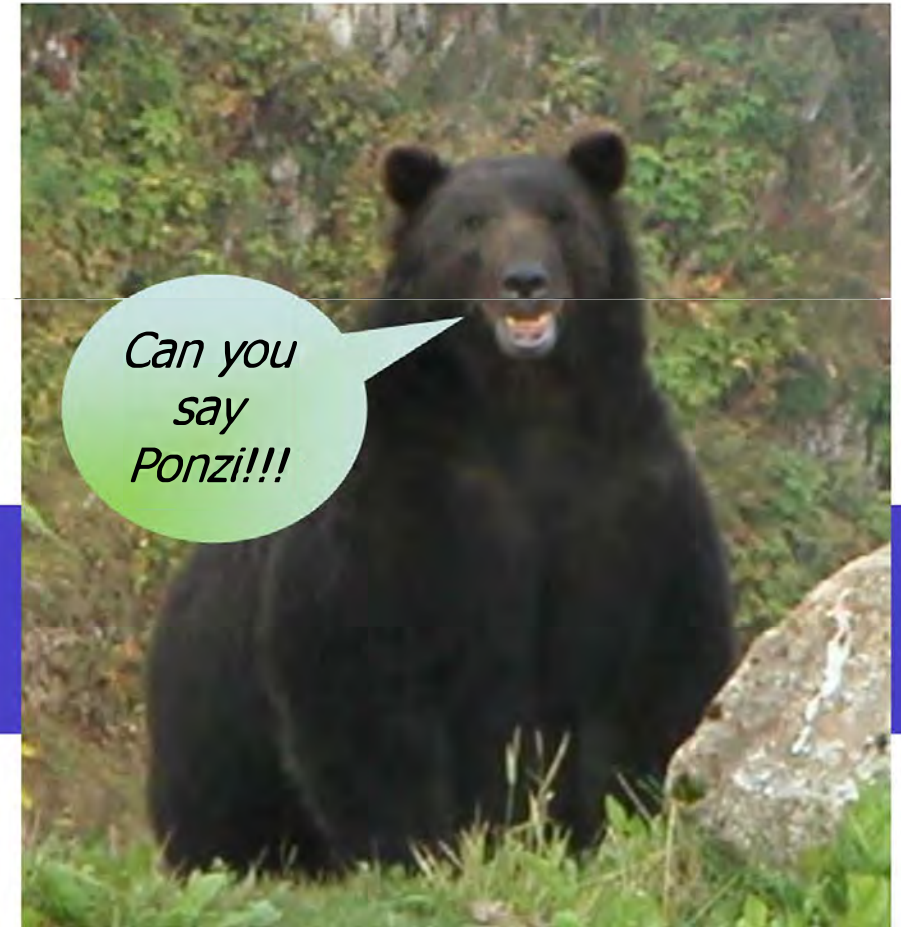


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- Hatchery releases put wild and hatchery fish in direct competition for declining resources

## The sustainable solution

- Close hatcheries
- Manage for spawners and habitat

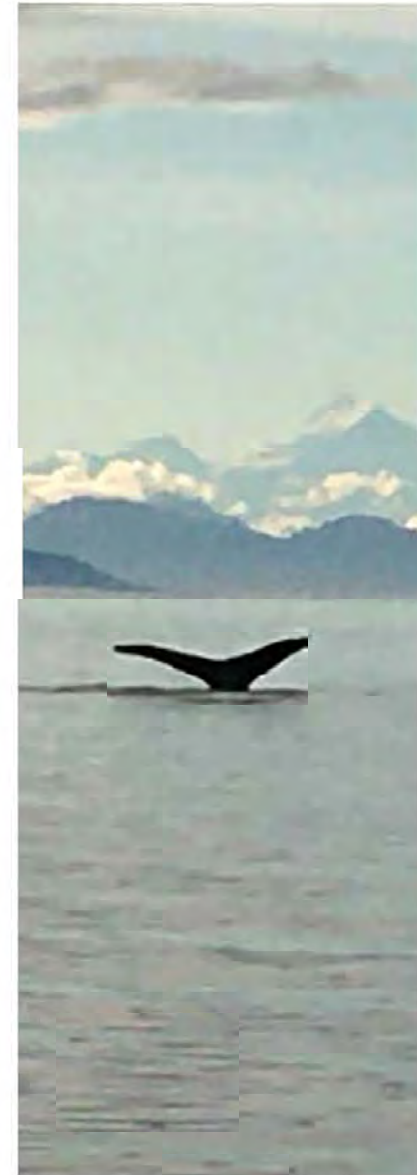


# What if mega hatchery releases continue...



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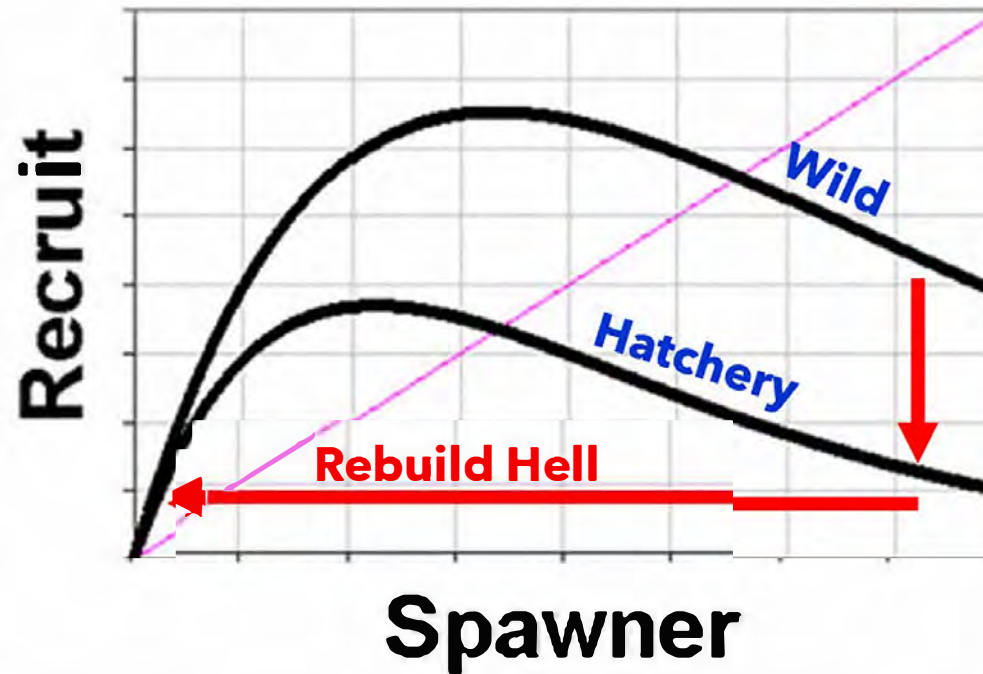
- Reduced ocean productivity
- Reduced fish production
- Reduced biodiversity, fitness
- Increased ecologic risk from
  - Hatchery problems
    - Water supply, disease outbreak, fitness
  - Climate changes, zoonosis
- Fatter whales, thinner wallets



# Mega hatchery overshoot...



- Reduce productivity
- Extreme threshold variability
- Collapse of wild stocks
- Rebuild Hell



# In summary, Ocean Ranching is...



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- Not what happens Naturally
- Supplants wild production
- Not sustainable
  - Ecologically
  - Financially
  - Legally
- Must be curtailed
- For a healthy ecosystem
- And abundant salmon, herring, eulachon...

Why will doing something in nature, different from nature, be better than nature?



# Best to spend some hatchery savings



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- On assessment and management of wild stocks

(i.e. counting fish at remotely monitored video weirs)



"If 10% of the money spent on hatcheries was spent on basic stock assessment of wild fish we'd have more fish and a management program to maintain them."  
(what I heard Dr. Brian Riddell, CDFO, say years ago)

# Sad sustainability



- Hatchery - always having another bay to exploit
- Fisheries - always having another stock to exploit
- Humans - always flushing nutrients out of the nutrient cycle

*Anybody want to Save the World  
and be an Effluentologist when  
they grow up?*

# Observe and question...

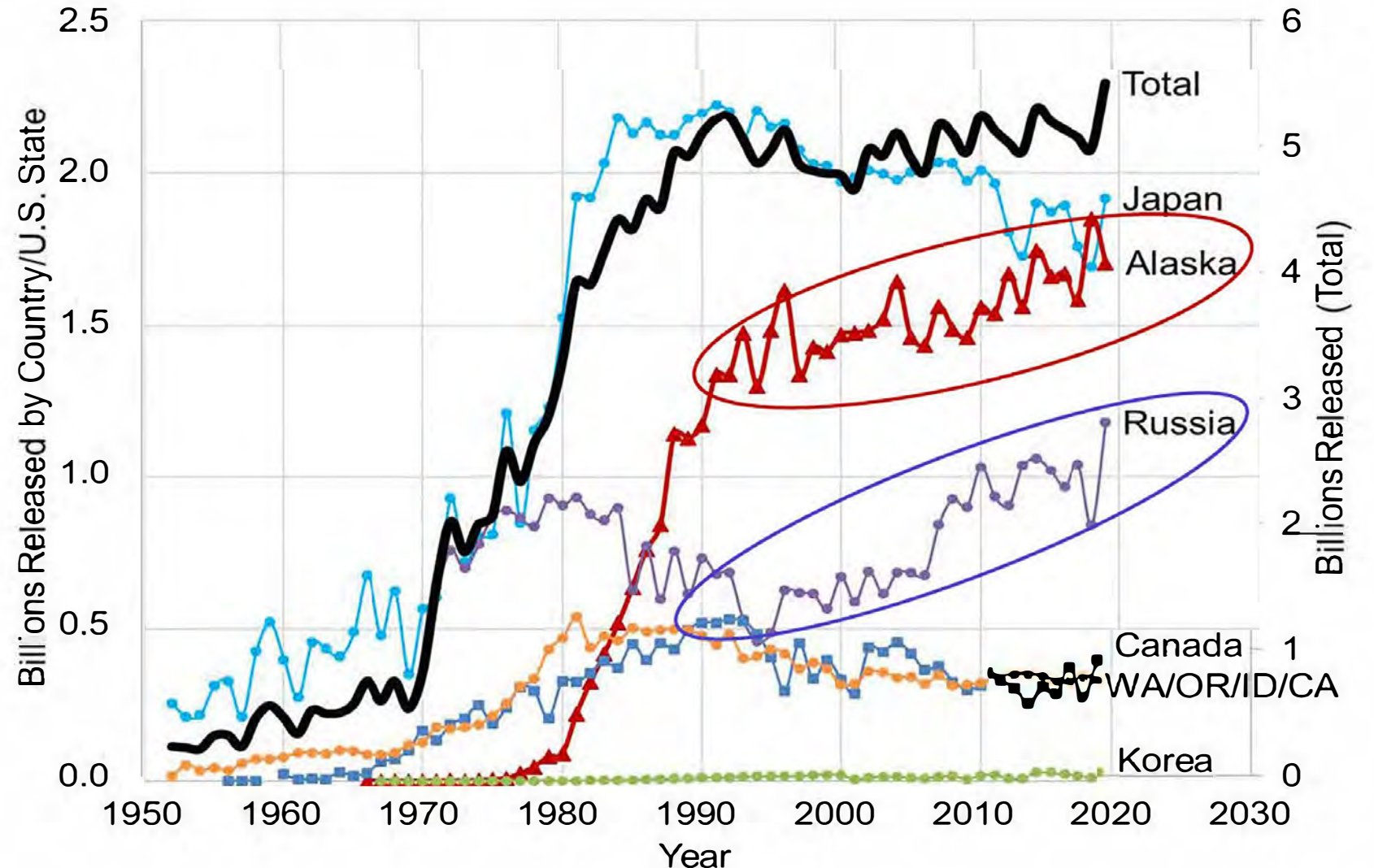
## Huge hatchery releases in the North Pacific



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- Releases since 1989:
  - Significantly\* up
    - Alaska
    - Russia (especially since 2006)
  - Significantly\* down
    - Japan
    - Canada
    - WA/OR/ID/CA

\*Spearman's rho rank correlation trend test  $\alpha=0.05$



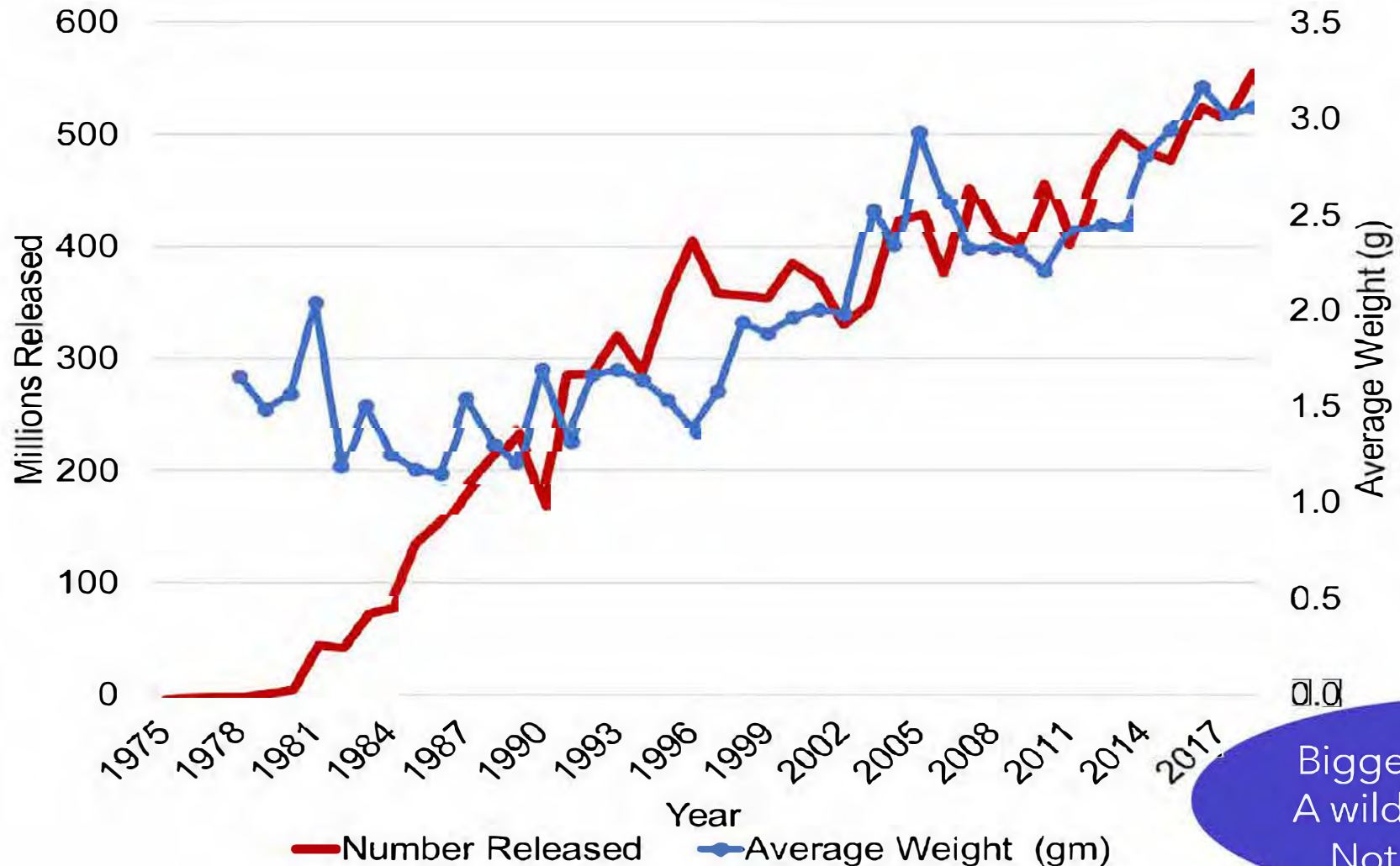


# SE Alaska Chum Release effort

## To have a survival advantage over wild fish?



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Bigger more better?  
A wild stock priority?  
Not in our ocean



# Hidden Falls Hatchery Chum

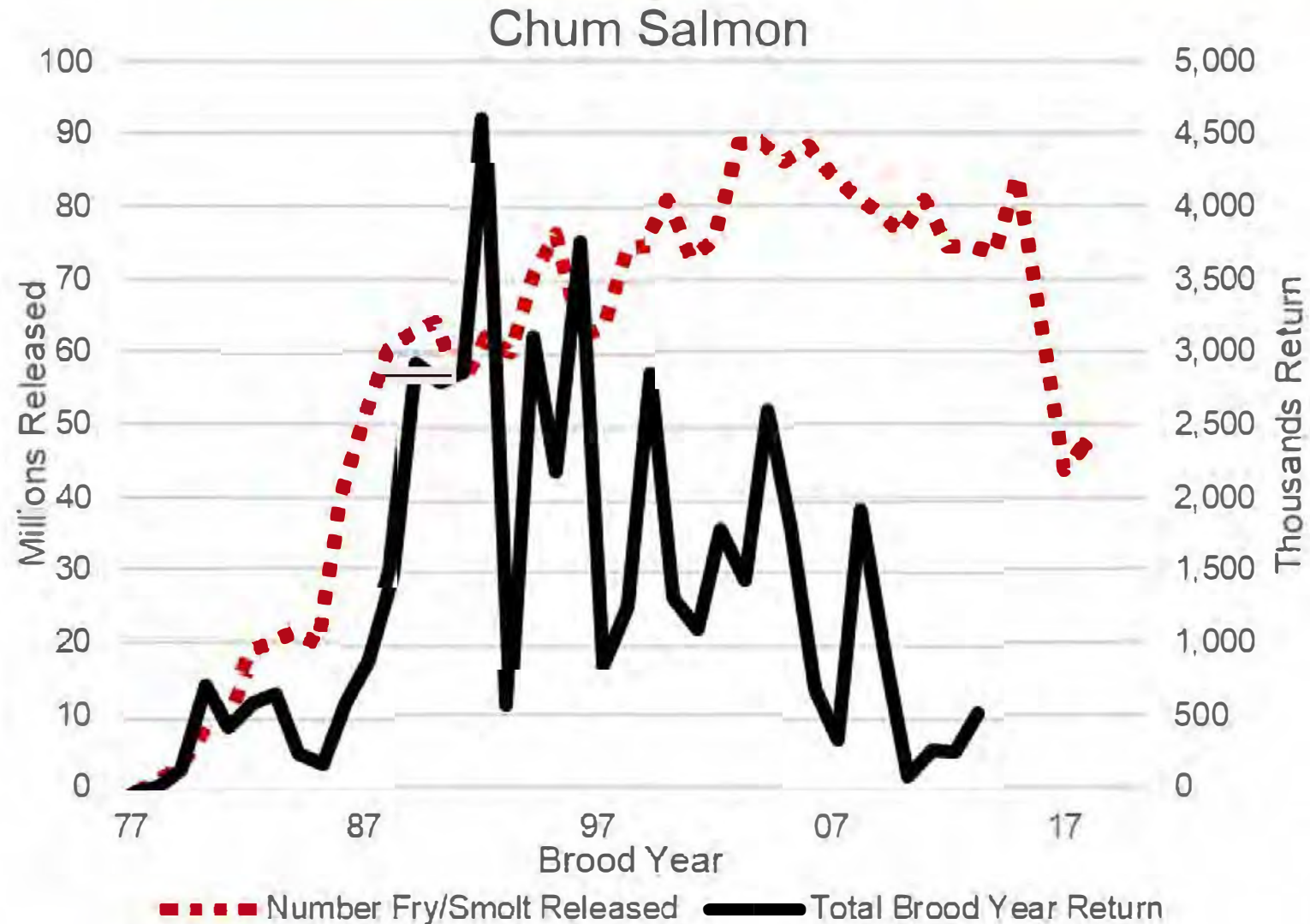
## Boom and Bust



*The biggest in SE Alaska*

*The biggest in SE Alaska*

- A pattern?
  - Returns Peak then
  - Returns highly variable and declining and now
- Challenges meeting Brood Stock and Cost Recovery goals despite
- Huge Releases



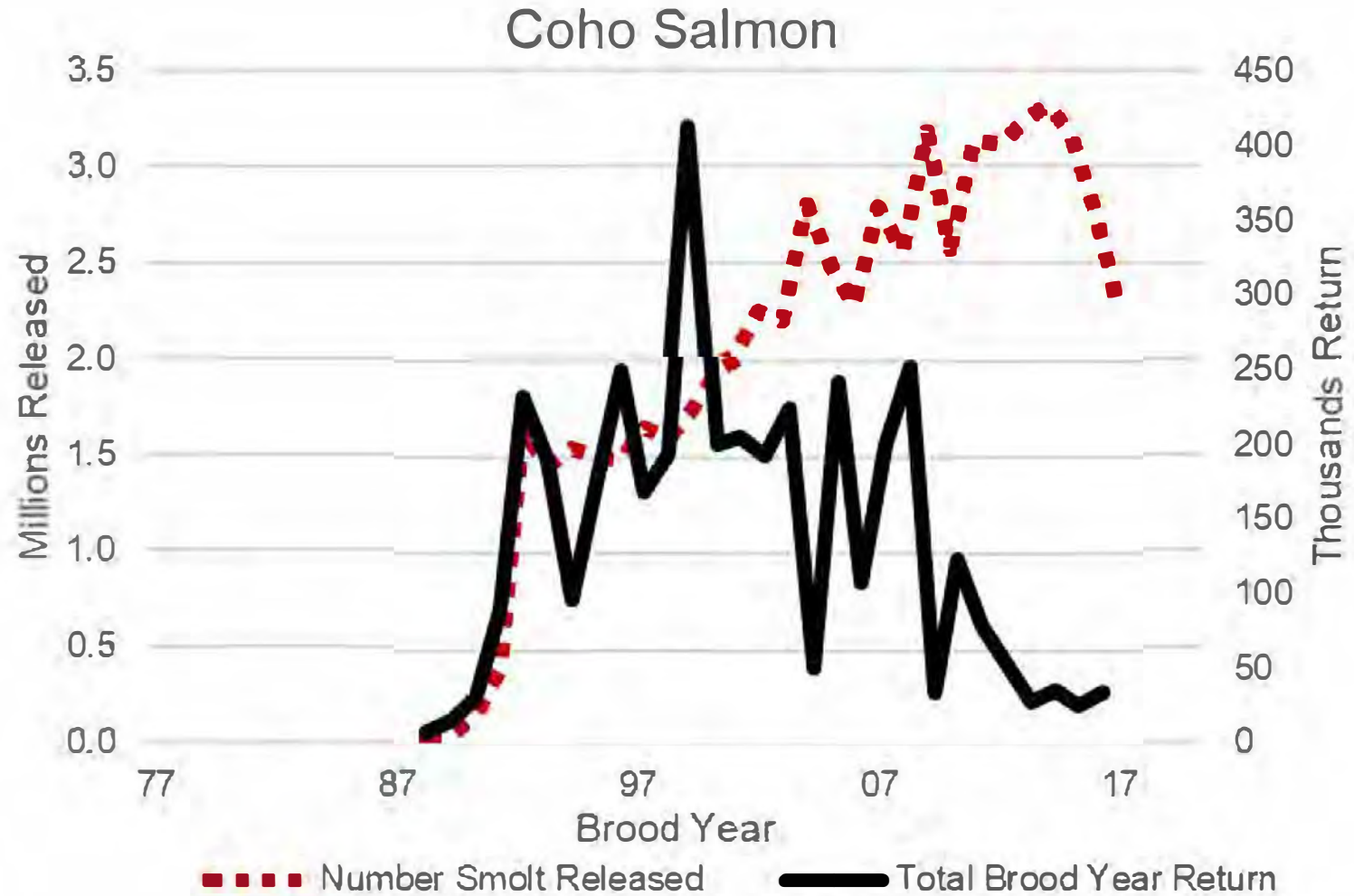
# Hidden Falls Hatchery Coho

## Boom and Bust



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- A pattern?
  - Returns Peak then
  - Returns highly variable and declining and now
  - Challenges meeting Brood Stock and Cost Recovery goals despite
  - Huge Releases





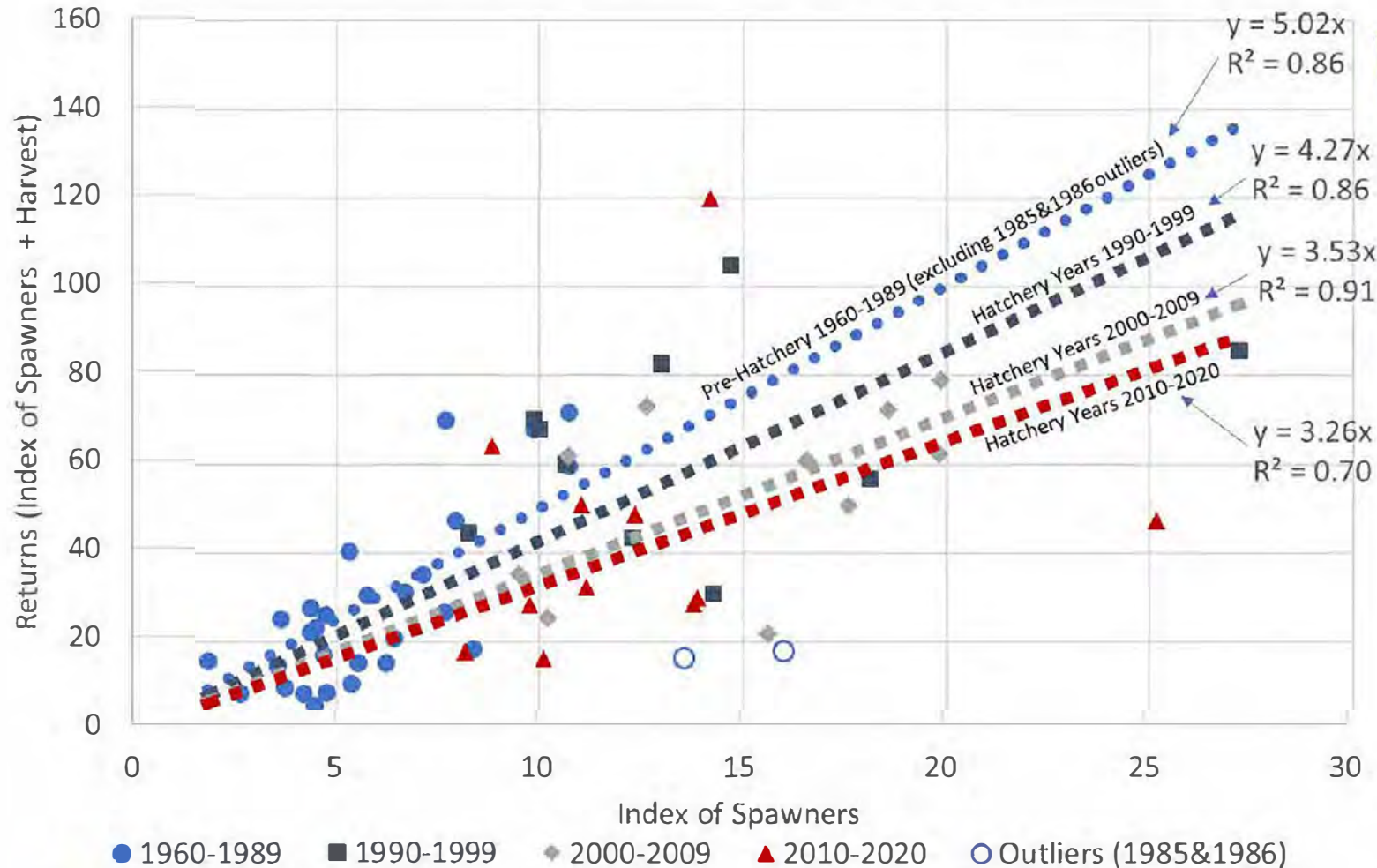


# SEAK Pink Return-per-Spawner post-hatchery decline in productivity?



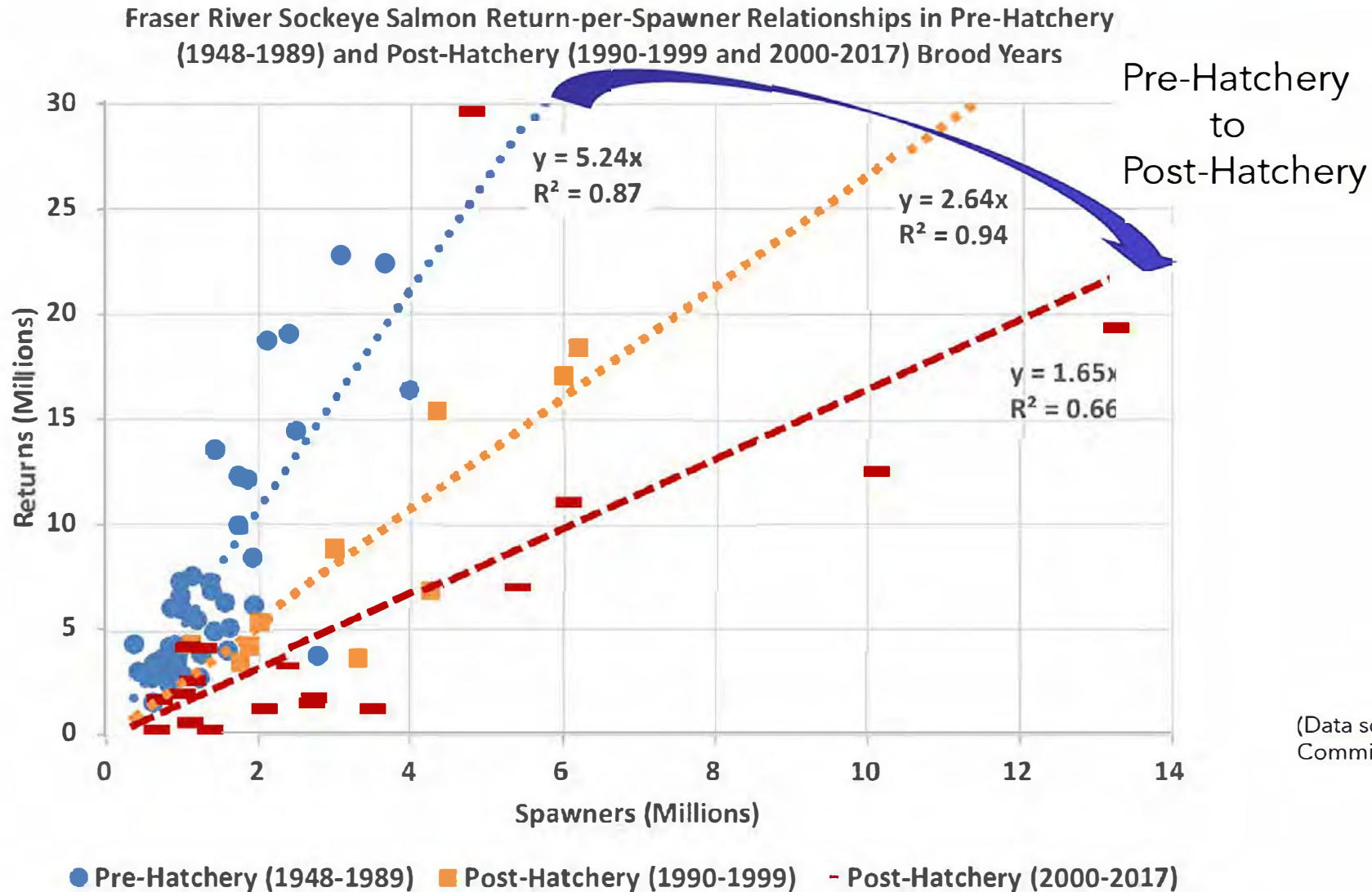
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Southeast Alaska Pink Salmon Return-per-Index Spawner  
By time period - 1960-1999 ex. 1985&1986, 1990-1999, 2000-2009, and 2010-2020



(Data source: ADFG, February 2023)

# Fraser R. Sockeye Return-per-Spawner hatcheries and big post-hatchery decline



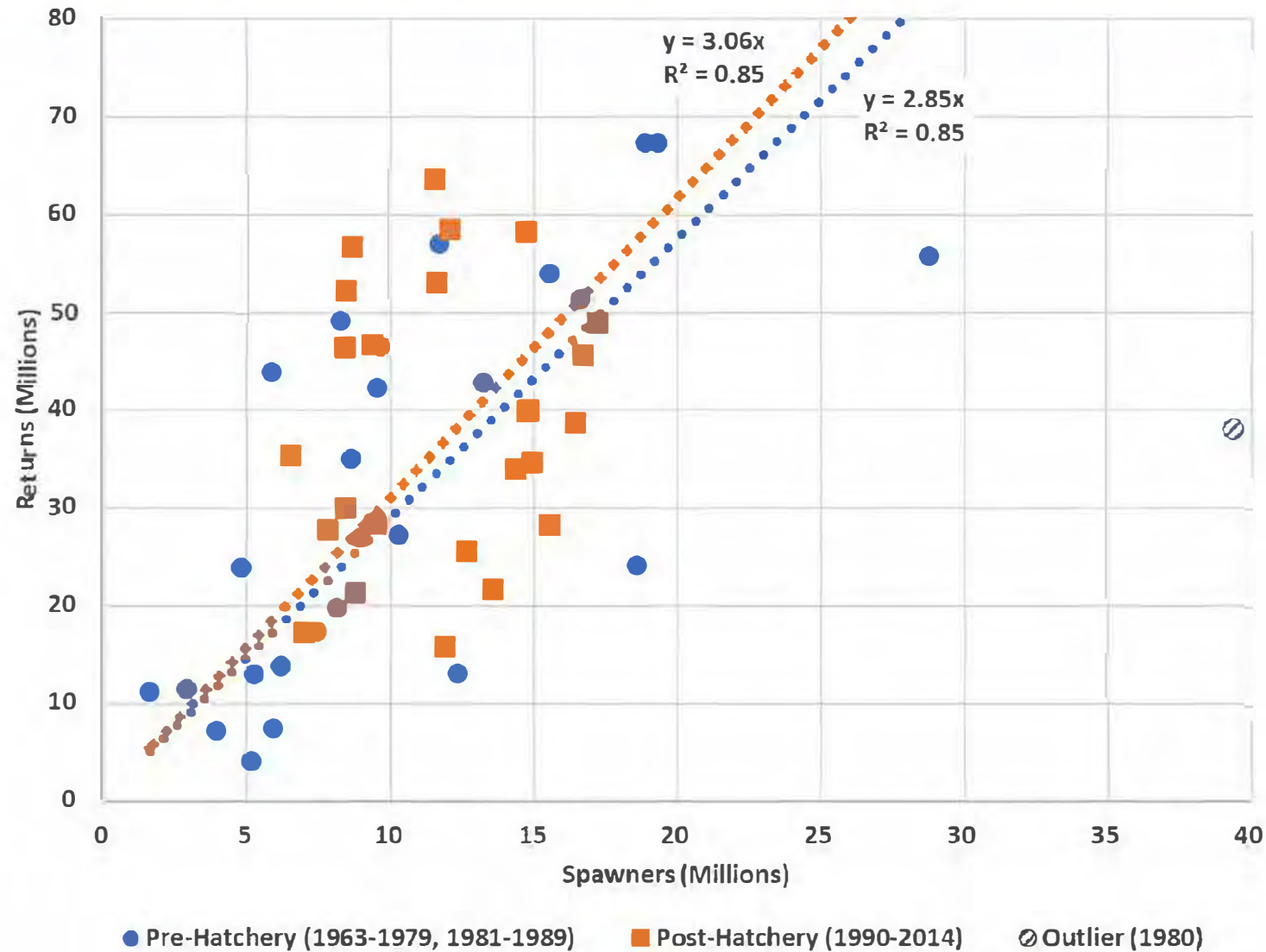
(Data source: Pacific Salmon Commission, February 2023)

# Bristol Bay Sockeye Return-per-Spawner

no hatcheries and no post-hatchery decline (ex. 1980 outlier)



PC311



Data source: ADFG,  
February 2023



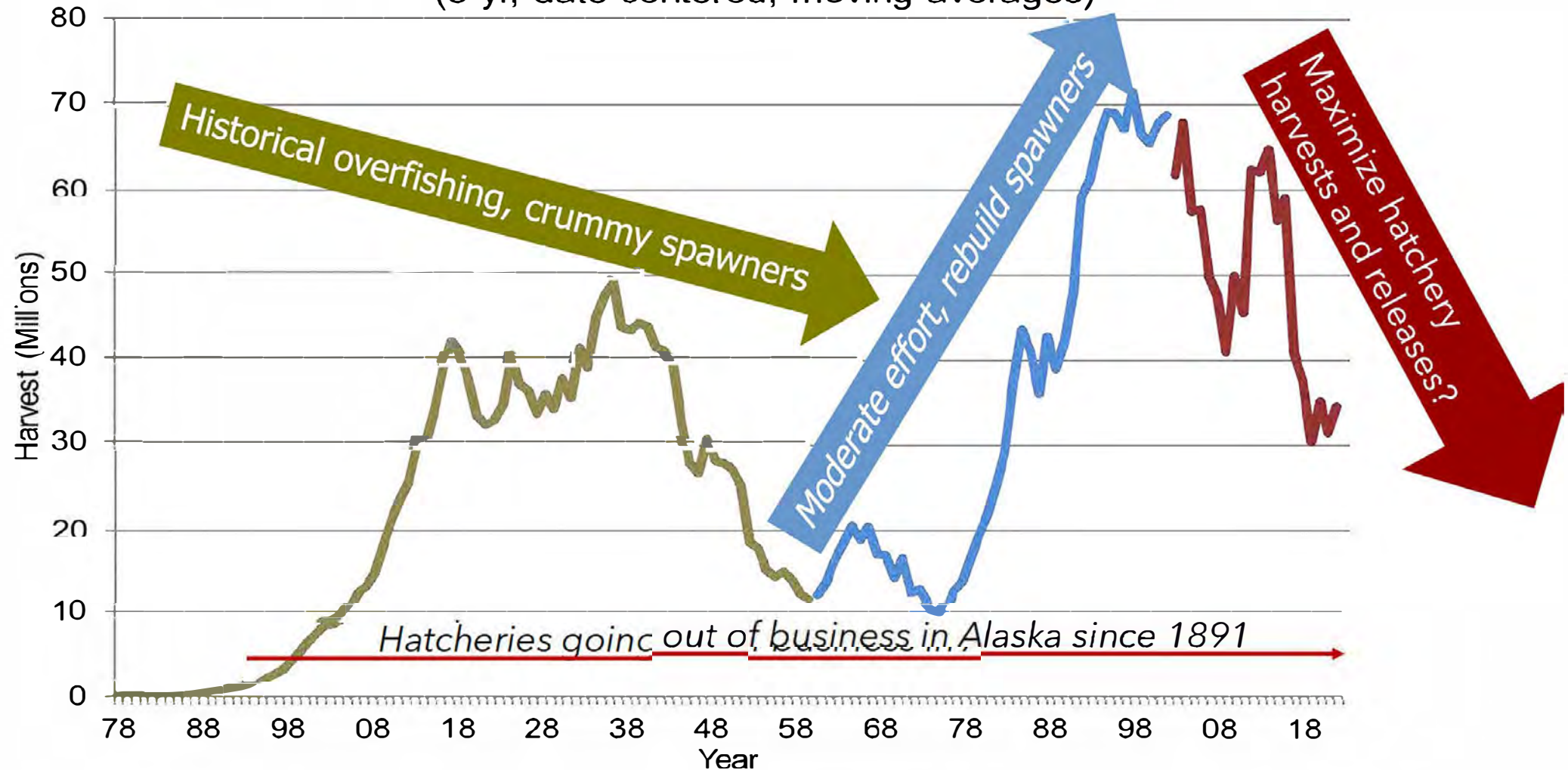
# Management Priorities?



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Industry to Biology to Industry? Case Pack to Escapement to Hatchery?

**Total Salmon Harvest, Southeast Alaska, 1878-2021**  
(5-yr, date centered, moving averages)







**Thanks for your carrying capacity!**





November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I commercial, sport, and subsistence fish in Ninilchik, Alaska, and I firmly oppose Proposal 43. I have a multi level interest in seeing LCI hatcheries succeed. Also, I have friends from all of the state that come to Homer and Seward to catch hatchery for their freezer. The success of Cook Inlet Aquaculture is of utmost importance. Thousands of Alaskans depend on fish from CIAA to benefit their family's for food and income. The State should do everything possible to help CIAA be successful including, forgiveness of loans, annual contribution, and favorable regulations.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

**Regulatory Authority:** The Alaska Department of Fish and Game asserts and we agree that the Board's limited authority over hatchery production is limited and cannot effectively veto fundamental department policy decisions for which there is specific statutory authority. Any action constraining the department's ability to permit a hatchery operation could be viewed as incompatible with the statutory scheme.

**Iterative Process:** Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a



permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Rod Van Saun  
Ninilchik, Alaska



November 13, 2023

Alaska Board of Fisheries



Dear Board of Fisheries,

I live in Wasilla, Alaska. I sport fish and participate in business that relies on the fisheries. I firmly oppose Proposal 43. Hatcheries help to maintain a sustainable resource for all user groups.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in the Lower Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Lower Cook Inlet region. Please review the following reasons why the Board should oppose and reject Proposal 43.:

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**Conservation Concerns:** ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.



**Department Oversight:** The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

**Lack of Evidence:** No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.


**Historical Production Levels:** ADF&G provides historical context, noting that the reduction to 25% of 2000 levels as proposed would cap Cook Inlet Aquaculture Association egg take levels at 58.75 million pink salmon eggs, significantly lower than current permits of up to 235 million pink salmon eggs. This reduction could hinder the ability of the hatchery operator to meet its production potential, affecting its financial position without any clear conservation benefits.

**Comprehensive Planning:** Each salmon enhancement region has a Comprehensive Salmon Enhancement Plan outlining production goals by species and time. The proposal overlooks the existing planning framework. Any changes to egg take levels should be made within the context of comprehensive planning to ensure the continued sustainability of salmon populations and production needs.

**Public Input and Participation:** ADF&G underscores the transparency in the hatchery permitting process, with permits and plans being subject to public input through public noticed meetings and comment periods. Any significant changes, such as proposed reductions, should involve a thorough examination of hatchery needs and must consider stakeholder input to ensure a well-informed decision.

**Risk to Wild Salmon Stocks:** The proposal's focus on reducing hatchery production to address alleged over-production lacks any clear link to the impact and well-being of wild salmon stocks. A rigorous scientific approach that considers the broader ecosystem dynamics and ensures conservation concerns truly exist, must be demonstrated before adversely affecting sustainable hatchery practices.

Sincerely,  
Shawna Williams

  
Wasilla, Alaska



**Submitted by:** Dennis Zadra

**Community of Residence:** Cordova, Alaska

**Comment:**

I am strongly oppose to Proposal 35 and Proposal 43. Both of these Proposals are based on the assumption that hatchery production is detrimental to wild stock salmon, but there is no real evidence to support this. The hatchery system has been around for a long time and is critical to the commercial industry.

Proposal 35: Oppose

Proposal 43: Oppose

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