

**PERMIT ALTERATION REQUEST FORM**

**STATE OF ALASKA  
DEPARTMENT OF FISH AND GAME  
PRIVATE NONPROFIT PROGRAM**

This form is to be used by a PNP hatchery permit holder to request an alteration to their PNP permit. Requests must be received on this form by the PNP Hatchery Program Coordinator no later than February 15 of the calendar year that the proposed alteration is to occur. The commissioner will, in his or her discretion, extend the deadline on a case-by-case basis, if the request is justified by extraordinary circumstances or emergency. The regional planning team may review and make a recommendation to the commissioner on this request. The commissioner will, in his or her discretion, consider past management practices and fish culture procedures associated with the request, the past performance of the hatchery, the recommendation of the regional planning team, and any additional information deemed necessary. Issuance of a Notice of Permit Alteration (NPA) by the department modifies the hatchery permit. Refer to 5 AAC 40.850.

**GENERAL INSTRUCTIONS**

1. Fill in the blanks on the form provided (grey boxes will expand as you type).
2. Where necessary to fully answer a particular question, attach additional pages marked with the corresponding appendix number in the application.
3. Applications **must** be typed.
4. Applications **must** be signed by a legally authorized representative of the applicant.
5. The application should be forwarded to the following address:

STATE OF ALASKA  
DEPARTMENT OF FISH AND GAME  
DIVISION OF COMMERCIAL FISHERIES  
P.O. BOX 115526  
JUNEAU, AK 99811-5526

ATTENTION:  
PNP HATCHERY PROGRAM COORDINATOR

6. Requests for assistance in preparation of the application or related activities should be directed to the PNP Hatchery Program Coordinator. Such requests will be honored to the extent available staff time and funds permit.

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**I. IDENTIFICATION OF APPLICANT**

**A. Applicant Information**

<u>Bryanna Torgeson</u> Name	<u>Armstrong-Keta, Inc.</u> Organization
<u>P.O. Box 1075</u> Street Address OR P.O. Box	<u>(907)586-3443</u> Phone Number
<u>Sitka</u> <u>AK</u> City                              State	<u>99835</u> Zip

**B. Hatchery Information**

<u>Port Armstrong Hatchery</u> Hatchery Name	<u>13</u> PNP Permit Number
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**II. STATEMENT OF APPLICANT'S GOALS AND OBJECTIVES**

Describe the nature of the requested alteration, why you decided to request it, and what you generally expect to accomplish by the alteration to your program.

Armstrong-Keta, Inc. (AKI) is requesting an alteration to its Port Armstrong Hatchery (PAH) permitted green coho egg capacity to allow for an additional 2 million eggs, increasing the current capacity from 6 million to 8 million green eggs. This request is based on projected production needs and anticipated survival rates, which indicate that the proposed increase would result in approximately 45,000 to 90,000 additional adult coho returning in 2029.

The requested alteration is intended to enhance hatchery production efficiency and increase adult coho availability for commercial harvest, thereby providing direct benefits to the regional fishing industry. Specifically, this will benefit the troll fleet as common property contribution is approximately 50%. Increasing production capacity would also improve AKI's long-term financial stability by helping to stabilize returns and support ongoing program operations. Overall, the proposed change is expected to strengthen program outcomes while being consistent with the goal of sustainable salmon management.

Please answer the following questions.  
How do you anticipate that the proposed project will affect wild salmon stocks and existing fisheries?

AKI does not anticipate that the proposed project will result in adverse effects to wild salmon stocks or existing fisheries. The requested alteration involves an increase in permitted hatchery egg capacity and does not change broodstock collection practices, release locations, or management strategies in a manner that would negatively affect wild populations. Hatchery operations will continue to be conducted in accordance with existing regulatory requirements and management plans designed to minimize interactions with wild stocks. As a result, the proposed project is expected to maintain current levels of protection for wild salmon while providing additional benefits to existing fisheries through increased adult returns.

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For new projects and changes to existing projects, how will the potential effects and interactions between hatchery-produced stocks and wild stocks be assessed?

Potential effects and interactions between hatchery-produced stocks and wild salmon stocks will be assessed through existing monitoring, reporting, and management frameworks implemented in coordination with the Alaska Department of Fish and Game (ADF&G). Assessment efforts include the use of established marking and tagging programs to distinguish hatchery-produced stocks from wild stocks and to evaluate contribution rates, migration patterns, and harvest distribution.

Broodstock collection levels, release numbers, timing, and locations will continue to be monitored, and data derived from marking and tagging, adult return monitoring, and fishery harvest information reviewed to detect any changes. Through these ongoing assessment efforts, interactions between hatchery-produced and wild stocks will be evaluated to ensure continued protection of wild salmon populations.

What marking and recovery studies are being proposed that will allow the project to be evaluated?

The project will utilize established marking and tagging programs to allow evaluation of hatchery contributions and potential interactions with wild salmon stocks. Hatchery-produced coho will be marked using fin clips and coded-wire tags (CWTs) in accordance with ADF&G protocols. These marks will allow for identification of hatchery coho during adult returns, fishery harvest sampling, and escapement monitoring.

Recovery of marked coho will occur through routine sampling. Data collected from these marking and recovery efforts will be analyzed to assess adult return rates, contribution to fisheries, distribution patterns, and potential interactions with wild salmon. This approach ensures that the effects of increased hatchery production can be evaluated and managed.

Has this project been discussed with department area or regional management biologists or other staff?

Yes, this permit alteration has been discussed with department staff.

In 2022, AKI applied for a similar permit modification requesting an increase in coho capacity at PAH from 5 million to 8 million green eggs. At that time, Pathology staff indicated no fish health concerns. However, Genetics, Commercial Fisheries, and Sport Fisheries staff either expressed concerns or did not recommend approval of the proposal. The primary concern related to uncertainty regarding the potential effects of the early-entry rearing strategy on homing behavior. In recognition of these concerns, AKI amended the original request and subsequently received approval for a reduced increase of 1 million green eggs.

More recently, AKI requested that this proposed increase be included as a discussion item at the Fall Regional Planning Team (RPT) meeting. AKI maintains that the early-entry rearing strategy does not negatively affect homing behavior. The current request reflects prior department feedback, ongoing evaluation of program performance, and continued coordination with management staff.

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III. **IMPACTS ON THE EXISTING HATCHERY PROGRAM**

A. **Present Permitted Capacity**  
(numbers of green eggs by species)

Pink	<u>105 million</u>	Coho	<u>6 million</u>
Chum	<u>60 million</u>	Chinook	<u>                    </u>
Sockeye	<u>                    </u>	Other	<u>                    </u>

B. **Capacity After Request**  
(numbers of green eggs by species)

Pink	<u>105 million</u>	Coho	<u>8 million</u>
Chum	<u>60 million</u>	Chinook	<u>                    </u>
Sockeye	<u>                    </u>	Other	<u>                    </u>

C. **Water Use**

1. **List the total amount of water available and the source.**

28.5 cubic feet per second (cfs)

2. **List the amount of water presently being used.**

Current water use is approximately 19 cfs. Actual usage varies seasonally and typically ranges from 18 to 23.2 cfs, with an average monthly use of approximately 20.1 cfs.

3. **List the additional amount of water needed for this alteration.**

The proposed alteration will not require additional water beyond existing operational levels. Adequate surplus water is available throughout the year to accommodate the proposed increase in early-entry cohos. \*

IV. **HATCHERY DESIGN**

A. Please provide a detailed description of new facilities needed with this alteration (e.g., buildings, incubators, rearing space, piping, etc.). This description should represent a solid concept of the proposed hatchery changes/expansion. Drawings showing the layout of new structures should be attached when appropriate.

\*(continuation from Question III.C.3. due to formatting issues)  
Standard coho production will be transferred to saltwater prior to the period when early-entry coho require freshwater rearing space, ensuring that overall water demand remains within current usage levels.  
  
(Answer for IV.A)  
No new facilities are required to implement this permit alteration. All operations will use existing infrastructure, equipment, and rearing capacity. Under this alteration, the additional

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coho would be raised using early-entry saltwater introduction. To accommodate this change, existing brood raceways would be used for short-term rearing of the additional coho before they are transferred to saltwater netpens.

V. **DECLARATION AND SIGNATURE**

I declare that the information given in this application is, to my knowledge, true, correct, and complete.

Bryanna Torgeson  
Name of Applicant

2/11/2026  
Date Signed

Bryanna Torgeson  
Signature of Applicant