

Dear BOF Chairman and members

March 2020

PLEASE OPPOSE 277

Problems have been discovered in SEAKS; Whale Bay, Deep Inlet, Sitka Sound and West Crawfish NE Arm from the remote hatchery release in Crawfish. Since ADFG allowed this Remote Release Site with the stipulation **“the program would ramp down if problems are discovered”**, then this program is to be ramped down.

At the Regional Planning Team meeting in April 2014, NSERRA made a request as stated in item **6.6 Sawmill Creek Hatchery PAR, to add 50 million chum salmon eggs and add Crawfish Inlet as a remote release site** (see minutes below).

This request, would use Medvejie Creek Hatchery stock, to amend the Sawmill Creek Hatchery permit that had been issued by the commissioner and “amend the terms of the permit relating to the source and number of salmon eggs, and the specific locations designated by the department for harvest”¹.

Increasing artificial chum production by 50 million or the compromised 30 million salmon eggs, engineers and alters the wild public trust pastures in this relatively wild Remote Release Site wilderness area, into a hatchery monoculture and Special Harvest Area without benefit of an accessible public regulatory process.

“The department’s biggest concern with this (Crawfish Inlet) project is potential straying into the West Crawfish NE Arm chum salmon indicator stream.” “The department would like to start with lower numbers and ramp the program up if no problems develop when the fish return.”²

Unfortunately, problems did develop and ***“the Departments biggest concern with this project far surpassed a “potential straying” and became an ADFG documented reality of massive straying reaching 100% in 2018 and 2019.***

The remote release in Crawfish Inlet was allowed with the caveat **“the program would ramp down if problems are discovered.”**

Proposal 277 ignores this ADFG determination to safeguard wild fish priority and disregards Alaskan laws and policies.

¹ AS 16.10.440 (b) Regulations Related to Released Fish

² SEAK RPT Minutes April 2014

“The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.”³

Questions to ask of Proposal 277:

1. **why is ADFG sacrificing Whale Bay, Deep Inlet, Sitka Sound and West Crawfish NE Arm diverse wild salmon genetics that are being heavily overlapped with the shallow structured late run Sawmill hatchery stock?**
2. **Why is the concerned staff comments documenting the overlapping run timings of hatchery strays being concealed?**
3. **Why is the project not being ramped down as was decreed at the Regional Planning Team meeting?**
4. **Why are PNP’s disregarding their statutory mandates that attend the privilege of operation of a hatchery and use of wild pastures for free?**
5. **Where is the regulation as required by statute for amending permits by regulation for these massive projects affecting the public trust in remote ecosystems?**
6. **Is it legal to focus on only one part of the law without incorporating the other: “Substantial public benefits without jeopardizing natural stocks?”⁴**

NSERAA wanted to “truly test a new program....at full production to see if there are any problems, **but testing at full production requires an understanding that the program would ramp down if problems are discovered.**

Below is the minutes of the 2014 Regional Planning Team meeting that began the process to engineer the relatively intact SEAK outside Districts ecosystems into a hatchery monoculture. Please ramp this project down as originally specified.

With Kind Regards,
Nancy Hillstrand
907-399-7777

³ PNP Hatchery Act

⁴ AS 16.10.400 Permits for Salmon Hatcheries: The commissioner may issue a permit subject to restrictions imposed by statute or regulation to a nonprofit corporation... **“the action would result in substantial public benefits and would not jeopardize natural stocks.”**

6.6 Sawmill Creek Hatchery PAR to add 50 million chum salmon eggs and add Crawfish Inlet as a remote release site. Introduction: (Steve Reifentstahl, General Manager, NSRAA) NSRAA has been searching for a new chum salmon program since 1999. Recently, NSRAA has submitted two management feasibility requests with the department; one in Excursion Inlet and the other for Pelican. The department did not review either of those sites favorably. NSRAA requested the department look at the geography of northern Southeast Alaska and come up with a list of possible sites the department might consider for a new pink or chum salmon program. The department produced a report with several areas that could possibly work for a new release site, but the document was not intended to be a guarantee that any PAR submitted for one of those locations will pass without question. NSRAA chose Crawfish Inlet as a new release site based on the report and the ability to utilize Sawmill Creek Hatchery. There will need to be several modifications made to the facility and there will be difficult operational challenges, but there is water available to handle the requested production. The PAR is requesting 50 million chum salmon eggs. Medvejie Creek Hatchery fall chum salmon stock will be used, which will require approximately 50,000 additional adult chum salmon for broodstock. The eggs would be taken at Medvejie Creek Hatchery and transported to Sawmill Creek Hatchery for incubation. In the spring, the fry will be moved from the incubators into transfer tanks, held for 24 hours, and then transported by boat to Crawfish Inlet for short-term rearing and release. Crawfish Inlet is approximately 40 miles by boat from Sawmill Creek Hatchery. The return on a 50 million chum salmon egg program, given current marine survival (2%) and price (\$.55/lb.), would generate a four million dollar fishery. If all four million dollars went to the troll fleet, they would be in their lower end of their target allocation of enhanced salmon range. The findings of the Alaska Board of Fisheries (**Southeast Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364) Finding #94-02-FB**) lists three tools for making adjustments to the distribution of harvest to meet allocation percent goals: 1) special harvest area management adjustments; 2) new enhanced salmon production; and 3) modification of enhancement projects production, including remote releases. This PAR uses the second and third tool to address the current allocation imbalance. This PAR also could test the theory heard many times during allocation discussions; that trollers can harvest all the returning fish in a THA if they are given exclusive rights to the area. NSRAA will ask for the THA to be permitted for all three gear groups, and the NSRAA board will use the THA as a tool to address allocation imbalances. Crawfish Inlet was chosen to minimize wild stock interaction. There should be very few non-target species caught in the THA located in the bay. There

may be some non-target species caught in the troll fishery that is open in front of Crawfish Inlet in August. As the fishery targeting the Crawfish Inlet return is ramping up, sampling should be able to identify if too many non-target species are being harvested. If a problem is identified, the Crawfish Inlet fishery could be pulled back into the THA to minimize non-target species catch. The 50 million chum salmon egg increase was not chosen arbitrarily; the return on a 50 million chum salmon egg release is what is necessary to give the fishermen a return on investment that is large enough to justify the amount of money NSRAA plans to invest in this new project.

Discussion: The stock composition of Medvejie Creek Hatchery fall chum salmon is 18% three-year-olds. If 50 million chum salmon eggs are taken in 2014, the first return would be approximately 170,000 adults in 2018 (all three-year-olds), and 810,000 adults in 2019 (three and four-year-olds), and a full component (three, four, and five-year-olds) in 2020. Medvejie Creek Hatchery takes 20 million eggs for release at the hatchery to provide broodstock for the chum salmon program. It may be difficult to produce the entire 50 million chum salmon eggs for the Crawfish Inlet release every year. West Crawfish Inlet has a summer chum salmon return that is used by the department as an indicator stock. The West Crawfish Inlet chum salmon stock was sampled last year as part of the straying study and found to have very few hatchery fish straying into the system. The department may require NSRAA to continue to sample the West Crawfish Inlet system after the straying study work is completed. The department feels that 20 million chum salmon eggs is a conservative baseline level for evaluation of a new chum salmon program. An NSRAA gear representative noted there is a difference when comparing Crawfish Inlet and Port Asumcion; the Port Asumcion project is primarily trying to generate cost recovery for POWHA while the Crawfish Inlet project is being developed to create commercial fishing opportunity. **The department's biggest concern with this project is potential straying into the West Crawfish Inlet chum salmon indicator stream. The department would like to start with lower numbers and ramp the program up if no problems develop when the fish return.** An NSRAA gear representative noted that if the return is not large enough to attract gear effort, especially with the troll fleet, then the evaluation of the fishery may not be accurate. The ideological argument; in order to truly test a new program, the program has to be tested at full production to see if there are any problems, **but testing at full production requires an understanding that the program would ramp down if problems are discovered.** An NSRAA representative noted that the 50 million chum salmon egg number was derived from a business goal. Furthermore, the department adopting an arbitrary 20 million egg starting point for chum salmon projects changes how an association can operate. At this

point the discussion revolved around how the department chose the starting point of 20 million and whether there was a chance of increasing that number. NSRAA felt the number was arbitrary and a complete surprise, especially as it was presented as policy or a long standing guideline. The department projected a 500,000 adult chum salmon return from a 20 million egg program, which they feel is a significant enough return to evaluate the program while also making contributions to the commercial fleet. A department motion to amend the PAR from 50 million to 20 million chum salmon eggs for Crawfish Inlet failed to carry by a vote of 3-3. The votes were split between the department and industry representatives. The PAR was tabled until the department had a chance to talk with genetics staff.

Sitka Tribe of Alaska (STA) submitted a letter in opposition to the NSRAA PAR to take 50 million chum salmon eggs for release at Crawfish Inlet. STA believes this release site will have a negative impact on resident salmon stocks in Crawfish Inlet, on subsistence sockeye salmon returning to Necker Bay, on the Sitka Sound herring stock, and the wilderness character of the area surrounding Crawfish Inlet.

The funding for the current straying study should take the project through 2016. Additional funding is available with the goal of continuing the project through 2023. The West Crawfish Inlet summer chum salmon are in the stream by the first week of August, which should provide segregation from the Medvejie Creek Hatchery fall chum salmon. The department was willing to agree to a 30 million egg amendment if: 1) NSRAA commits to sampling the West Crawfish Inlet index stream, if it is not already being sampled in the current straying study; 2) the terminal harvest will be sampled for wild stock interception; 3) NSRAA will be required to clean up the special harvest area if there is a buildup of returning hatchery chum salmon. NSRAA staff suggested a management plan that provides a cleanup fishery by cost recovery seine or commercial net gear, as necessary, to minimize straying concerns and evaluate the efficiency of the troll fishery.

Action: McDougall **MOVED** and Eliason **SECONDED** to **AMEND** the Sawmill Creek Hatchery PAR from 50 million to 30 million chum salmon eggs and add a remote release site at Crawfish

Inlet. **VOTE:** the motion to amend **CARRIED** unanimously. The vote to recommend approval **CARRIED** unanimously.

ADFG STAFF COMMENTS WEST CRAWFISH NE ARM RUN TIMING OVERLAPPED SIGNIFICANTLY BY HATCHERY STRAYS FROM REMOTE RELEASE INTO CRAWFISH INLET

“West Crawfish NE Arm Head is 1 of 9 chum salmon index streams in District 13 that form the Northern Southeast Outside subregion chum salmon. The average peak survey count (1982-2017) is 7200 chum salmon (range: 500-33,000 fish). Over that same time span, peak survey counts to West Crawfish index stream accounted for an average 24% of the total Northern Southeast subregion index.

Over the past 10 years, peak survey counts were obtained on August 8 (on average), and about 31% of peak survey counts included fish at the river mouth, indicating more fish moving into the stream__likely spawning in mid- to late August. Accurate assessment of chum salmon abundance becomes more difficult once peak numbers of pink salmon move into the stream in late August. The latest chum salmon survey data for the West Crawfish NE Head Index Stream is September 7, 2006, and included 400 chum salmon at the mouth, 100 in the intertidal, 2,780 live in the creek, and 5,400 carcasses. In most other late August survey counts, live chum still outnumber dead more often than not, indicating **the peak of the wild run--as far as carcasses are concerned--is probably late August and early September.**

2018 – otolith sampling results

- 8/27/2018 62% hatchery marked
- 9/28/2018 99% hatchery marked digging up wild reds

2019– otolith sampling results

- 8/27/2019 13% hatchery marked
- 9/4/2019 94% hatchery marked