

Submitted by: Jason Simmons

Community of Residence: Cooper Landing Alaska

Proposal Number 167.

This proposal is to stop the Guides and Public of using baited hooks for catching Salmon and Trout. We as trout guides believe that this is killing off the trout population on Middle and lower Kenai River.

There are other ways to catch Salmon with un baited hooks. Please take this in consideration for the Trout the Guides to save the fishery instead of destroying it.

Proposal 167: Support

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial and sport fish in Seward, Alaska. I work with salmon and directly employ 42 individuals who make their primary living off these fish. These fish are a vital resource for our coastal communities.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

Kristen Smith

██████████@██████████

Seward, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, sport, and commercial fisheries in Cordova, Alaska. As a commercial fisherman, and former hatchery worker for quite a few years, I feel I have a full circle view of just how large the hatcheries impact is on helping keep our fisheries sustainable.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Mackenzie Smith

██████████@██████████

Cordova, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am a young commercial fisherman participating in the PWS seine fishery for the last 8 years. I am interested in buying into this salmon fishery, and I support the sustainable use and management of our hatchery and wild salmon runs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

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- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Carter Snow

██████████@██████████

Homer, Alaska



Southeast Alaska Fishermen's Alliance ^{PC205}

1008 Fish Creek Rd

Juneau, AK 99801

Email: [REDACTED]

Cell Phone: [REDACTED]

Fax: 907-917-5470

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

February 5, 2024

Alaska Dept of Fish & Game
Board of Fisheries
John Wood, Chair
1255 W 8th Street
PO Box 115526
Juneau, AK 99811

Submitted via web portal

RE: Oppose proposal #43

Chairman John Wood and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is multi-gear, multi-species commercial fishing association representing our 300+ members involved in salmon, crab, shrimp and longline fisheries mainly in Southeast Alaska. SEAFA opposes proposal #43 that was heard at the lower Cook Inlet meeting and again at this Upper Cook Inlet Meeting.

PROPOSAL #43: Basic Management Plans – Oppose

SEAFA opposes Proposal #43 to undermine the Cook Inlet Hatchery production putting the organization at risk, economically and broodstock production wise and setting a precedent that would affect all hatcheries across the state.

A version of this proposal comes before the Board of Fish almost every meeting where a hatchery operates but does not present any compelling evidence for the need to limit hatchery production. ADF&G Staff comments (RC2) from the Lower Cook Inlet meeting has an excerpt from the Dept of Law that points out that the Board of Fish most likely DOES NOT (emphasis added), have the authority (to limit production) but the authority rests with the Commissioner of ADF&G to fundamentally change hatchery production levels or to make changes to hatchery production due to conservation concerns.

Hatcheries are permitted through a robust process involving the public, hatchery operators and ADF&G and a final review and decision by the Commissioner after weighing the public testimony, the Regional Planning Team meeting & resulting recommendations, the ADF&G internal review, and consistency with the regional Comprehensive Plan and Basic management plan.

Hatchery stocks provide an important role in protecting wild stocks by providing an opportunity to fish the enhanced stock and minimizing the effort on wild stocks particularly in those areas that have action plans in place to protect stocks of concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director



SSRAA

Southern Southeast Regional Aquaculture Association, Inc.
 14 Borch Street, Ketchikan, Alaska 99901
 P: 907.225.9605 F: 907.225.1348

February 12, 2024

Alaska Dept. of Fish & Game
 Alaska Board of Fisheries
 PO Box 115526
 1255 W. 8th Street
 Juneau, AK 99811-5526
 [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 2024 Upper 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](#)

SSRAA previously submitted public comments to the Lower Cook Inlet Finfish meeting in proposal 223. Of the on time public comments submitted, five were in favor, 1 supported with amendments but didn't provide any, and more than 80 were opposed to the proposal. The overwhelming opposition to this proposal correctly addresses the fact that this proposal will do nothing to "fix" the depressed returns that these releases are being blamed to have created.

Those opposed to hatchery production in general have been quick to "jump on board" the global synthesis paper by McMillan et al (2023). In her address to House Fisheries on February 6, 2024, Lorna Wilson, PNP Hatchery Program Assistant Coordinator for the Division of Commercial Fisheries, addressed some of the issues with this paper. Of the 206 papers used in this synthesis, 13 were related to Alaska, and 5 related to salmon trends in the North Pacific. Of those 13 papers, 7 found adverse effects, of which more than 50% of those papers used chum and pink from Asian hatcheries. 2 papers found mixed effects, 3 papers did not find adverse effects, and one was considered as having no effect. The 5 papers considered to have adverse effects were from the North Pacific where hatchery releases are predominantly from rivers and lakes (referred to as putting fish on fish), where Alaska releases are almost exclusively from saltwater releases.

At this same hearing, Doctor Katie Howard, Fisheries Scientist, Salmon Ocean Ecology Program, ADF&G, clarified that hatchery adult and immature pink salmon biomass in the North Pacific, is estimated to be 3.2%, with AK hatcheries making up **2.1%** of the total biomass. Additionally, her presentation included emerging data on pink salmon stock distribution, and changes in plankton quality as a food source in years a warming ocean and sea ice melt. These are examples of compelling information to take into account when wanting a "lever" to solve depressed salmon returns, and will be invaluable in helping officials at all levels make informed decision for Alaska and its residents.

Upper Cook Inlet Finfish Meeting 2024

The Commissioner, in 2019 implemented a directive of no increases to pink and chum egg take permits in Alaska. By this action, the Department recognized the needed for a pause to evaluate all the potential positives and negatives of this level of production to the various regions. Please allow the Department to carry out their due diligence in this regard, and keep the decision making with the bodies charged with regional oversight, using the numerous processes created within the enhancement structure.

We humbly ask the BOF to use the best science as a basis for any decision making in this arena, and not respond to emotional pleas that we “need to do something.” Not taking action on hatchery production is not the same as doing nothing.

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,

A handwritten signature in blue ink, appearing to read "Susan Orsted".

General Manager

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska since 1996, and Alaska's fishing opportunities are one of the reasons I love Alaska. I moved from Fairbanks to South Central in 2001, and own property in Kasilof. I miss the days of fishing for kings in the healthy populations of Southcentral. From Willow Creek (where I caught my first King) to the Kenai (where I've caught my largest) these populations have been decimated. One of the main reasons is Cook Inlet sockeye set nets pulling in King Salmon bycatch. For years it seems these nets have hauled in more Kings than have escaped upriver. Now we are paying for the continued allocation of these by catch fish to commercial netting. I fear I may never have a chance to fish with the opportunity of catching a king on the Ninilchik on Memorial Day, or spending a weekend in late June up at the Deshka targeting 2 kings.

It's time for ADFG to start allocating these resources to the people of Alaska, and stop only managing all of SouthCentral for commercial sockeye harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Eric Spade
Eagle River, AK

Submitted by: John David Stanley III
Community of Residence: Sterling Alaska

Proposal 167

Bait in this section of river has become a detriment to both silver salmon populations and the resident species of the river particularly the rainbow trout. Over the last 13 years of working on the river I've seen first hand the effects of bait have a negative effect on the silver salmon and trout. Finding undesirable silvers (red ones) floating down the river dead after being caught and released because of their color isn't an uncommon sight to see now along with the sheer number of prespawn fish being caught and released on a daily basis has skyrocketed. It has been well documented that catch and release fishing for silver salmon with bait results in a high mortality rate for the fish prior to them spawning. The trophy Rainbow trout that the Kenai is known for are also being affected by the increased pressure on them indirectly caused from the increased pressure on the silver salmon. In one week I found 5 trout over 30" dead with bait hooks in their throats. Those are the fish that bring people to the river and they are not easily replaced with our current management plan.

Proposal 167: Support

Submitted by: Ivan Stonorov
Community of Residence: Homer

To the Alaska Board of Fisheries,

I oppose, the Commercial Finfish Proposals # 43

The hatchery program has been one of the most successful non profit organizations in Alaska. This program has provided a sustainable source of food and employment for thousands of people. The salmon hatcheries have seen the return of many generations of salmon to different regions with continuing robust returns. These returns have secured the livelihood of many fishermen involved in the harvest of those fish. With the harvests of the salmon, the program has provided food security on a national level. Any disruptions to the hatchery production of salmon would have severe consequences to the Alaskan economy, and national food security.

There are many new articles about the negative impacts that hatcheries are having on wild stocks of salmon. I have read many of these articles, some of which have valid points but I have yet to read an article that has any conclusive scientific data that hatchery's are responsible for salmon declines. My response to these articles and others like it, is that the fluctuations in salmon populations depending on the year is a natural cycle. One year there are more salmon in the ocean, not just pink salmon but all species of salmon, and the even year there is more feed in the ocean, zooplankton etc. In my analysis, this is a natural cycle that happens. It is hard to compare large pink salmon returns to sockeye and coho returns because pink salmon spend one year in the ocean and other species of salmon spend one to three years or more in the ocean. Looking at the upper Cook Inlet sockeye return data collected by the Alaska Fish and Game shows that 2023 had a strong Sockeye return that was 27% greater than the preseason forecast. Similarly, Prince William sound had a strong return of pinks in 2021 and 2023. Many of these Cook Inlet fish entered the ocean at the same time as the Prince William Sound fish, both species had healthy ocean conditions and enjoyed a robust return just on different years because due to their biology the different species of salmon spend different amounts of time in the ocean.

Climate change is also a factor in the population changes that we are seeing. Pink salmon, black cod and pollock all seem to be species that are responding well to recent changes in climate. While, other species like cod, king salmon and opilio crab don't seem to be fairing quite as well in the changing environment. According

to Maranda Weiss's article "Too Many Pinks in the Pacific" that was published in Hakai Magazine, hatcheries only represent 15 percent of salmon in the ocean. It seems

unlikely that hatcheries are the cause of larger than normal pink returns, when they only represent 15% of the salmon population. Along with larger than normal pink returns, some of the largest sockeye returns on record have occurred in recent years. That being said, there are some species of salmon that have experienced smaller returns recently. For example Chinook salmon returns have been lagging. There are many environmental and human caused reasons for this, including poor commercial fishing management, sport fishing on the spawning beds, and warmer river conditions. In her article, Weiss also talks about the fact that fish are getting smaller and blames this on a lack of feed. While a lack of feed could be one factor, there also may be other evolutionary factors such as the fact that we have been harvesting salmon with gill nets, for more than half a century. Gill nets allow the smaller fish to pass through while the larger fish get caught, creating a surviving gene pool of physically smaller fish. Not to mention the fact that our in river sport fisheries target large fish leaving the smaller fish to be the spawners.

Hatcheries undoubtedly provide stability in the sport and commercial fisheries throughout the state of Alaska. 28 percent of the total ex-vessel value of Alaska commercial salmon catches is produced by hatcheries. This adds up to be around 150-300 million dollars worth of fish every year. A majority of these profits support local fishing families and go directly back into Alaskan communities. Further, as I travel around the state I witness many sport fishermen and supporting businesses enjoying the benefits of hatchery production. There have been hatcheries operating in Alaska for more than 50 years, producing many generations of salmon. The hatcheries have not changed but the climate is changing. When we talk about hatcheries and their long term impacts, we must pay attention to real scientific data and make educated conclusions.

Ivan Stonorov

Lifelong Alaskan, commercial and sport fisherman.

currently PWS Seiner and avid sport fisherman

Proposal 43: Oppose

Alaska State Legislature

REPRESENTATIVE LOUISE STUTES

Rep.Louise.Stutes@akleg.gov

Kodiak – Cordova – Seward



SESSION ADDRESS

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February 12, 2024

Alaska Board of Fisheries
PO Box 115526
1255 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing to you as Representative Louise Stutes, a steadfast advocate for the thriving fisheries and coastal communities of our great state. As a representative deeply connected to the diverse needs and aspirations of Alaskans, I am compelled to express my unwavering support for our hatchery programs and the invaluable contributions they make to our fisheries, economies, and ways of life.

Hatcheries have long been the lifeblood of Alaska's fisheries, serving as a beacon of sustainability and prosperity for countless communities across our state. From commercial fishermen to subsistence harvesters, sport anglers to indigenous communities, hatcheries play a vital role in ensuring equitable access to our precious salmon resources while bolstering the economic resilience of coastal regions.

Proposal 43, with its aim to curtail pink salmon production, poses a significant threat to the delicate balance that hatcheries have painstakingly maintained over the years. Such a reduction would not only jeopardize the livelihoods of fishermen and women but also undermine the cultural heritage and traditions of indigenous peoples who rely on salmon for sustenance and cultural continuity.

As a representative entrusted with safeguarding the interests of my constituents, it is imperative that we vehemently oppose measures that undermine the sustainability and integrity of our hatchery programs. Instead, we must advocate for policies that foster collaboration, innovation, and responsible stewardship of our fisheries, ensuring their vitality for generations to come.

I implore the Board of Fisheries to stand with the diverse array of stakeholders who depend on our hatchery programs and reject Proposal 43. Let us unite in our commitment to upholding the resilience and prosperity of Alaska's fisheries and the communities they sustain.

Thank you for your attention to this crucial matter.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

Representative Louise Stutes

Submitted by: Gary Swan

Community of Residence: wasilla, Ak.

All my support or opposition is covered in proposal survey. This process is out of perspective for the average Alaskan to be truly involved. Too many special interests, with paid lobbyists.

Proposal 1: Support	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 121: Oppose	Proposal 122: Oppose	Proposal 123: Oppose
Proposal 124: Oppose	Proposal 125: Oppose	Proposal 126: Oppose	Proposal 127: Oppose
Proposal 128: Oppose	Proposal 129: Oppose	Proposal 130: Oppose	Proposal 131: Support
Proposal 133: Support	Proposal 134: Oppose	Proposal 135: Oppose	Proposal 136: Support
Proposal 137: Oppose	Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Support
Proposal 142: Support	Proposal 143: Oppose	Proposal 144: Oppose	Proposal 145: Oppose
Proposal 204: Oppose	Proposal 205: Oppose	Proposal 206: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 216: Oppose
Proposal 217: Oppose	Proposal 218: Oppose	Proposal 219: Support	Proposal 221: Oppose
Proposal 222: Support	Proposal 223: Oppose	Proposal 224: Oppose	Proposal 225: Oppose
Proposal 226: Oppose	Proposal 227: Oppose	Proposal 228: Support	Proposal 229: Oppose
Proposal 230: Oppose	Proposal 231: Support	Proposal 232: Oppose	Proposal 233: Oppose
Proposal 234: Support	Proposal 235: Oppose	Proposal 236: Support	Proposal 237: Support
Proposal 238: Support	Proposal 239: Oppose	Proposal 240: Oppose	Proposal 241: Oppose
Proposal 242: Support	Proposal 243: Oppose	Proposal 244: Support	Proposal 245: Oppose
Proposal 246: Support	Proposal 247: Support	Proposal 248: Support	Proposal 249: Support
Proposal 250: Oppose	Proposal 251: Support	Proposal 252: Oppose	Proposal 253: Oppose
Proposal 254: Oppose	Proposal 255: Oppose		

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a retired USAF Chief Master Sergeant. The Air Force brought my family to Alaska for a 4.5-year tour. We moved to Alaska permanently in 2009 after retiring from the Air Force. We built our retirement home less than a mile from the Kenai River. We fish the Kenai and Russian rivers with family, friends and neighbors for pleasure and sustenance.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

David Thiede
Soldotna, AK

Submitted by: Melinda Thorn
Scow fishing LLC

Community of Residence: Kenai Alaska

I don't understand why the Kenai river has over 2 million sockeye salmon escaping in the river and you close the east side set net fishery in 2023 destroying the local economy causing processors to close could have given us beach nets only 600 ft from mean high tide any one of the board of fisheries members are welcome anytime to come to my beach site and see for yourself the kings do not swim in shallow water our beach nets are a very effective tool to help stop over escaping the river ask your biologist what happened in years past what happens poor returns there is plenty of fish for everyone I am asking the Board of fisheries to vote for the proposals to get us back fishing be fair to everyone and the great state of Alaska and the local economy

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Support	Proposal 81: Support
Proposal 82: Oppose	Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Oppose
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Support
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 106: Oppose	Proposal 107: Oppose	Proposal 108: Oppose	Proposal 109: Oppose
Proposal 110: Support	Proposal 111: Oppose	Proposal 112: Oppose	Proposal 113: Oppose
Proposal 114: Support	Proposal 115: Oppose	Proposal 116: Support	Proposal 117: Support
Proposal 118: Oppose	Proposal 119: Support	Proposal 120: Support	Proposal 121: Oppose
Proposal 122: Oppose	Proposal 123: Oppose	Proposal 124: Oppose	Proposal 125: Oppose
Proposal 126: Oppose	Proposal 127: Oppose	Proposal 128: Support	Proposal 129: Oppose
Proposal 130: Support	Proposal 131: Oppose	Proposal 132: Oppose	Proposal 133: Support
Proposal 134: Oppose	Proposal 135: Oppose	Proposal 136: Oppose	Proposal 137: Oppose
Proposal 138: Oppose	Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Oppose
Proposal 142: Oppose	Proposal 143: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 165: Oppose
Proposal 166: Oppose	Proposal 167: Oppose	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 175: Oppose	Proposal 176: Support	Proposal 177: Support
Proposal 178: Support	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 182: Oppose	Proposal 183: Oppose	Proposal 184: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 187: Oppose	Proposal 188: Oppose	Proposal 189: Support
Proposal 190: Support	Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose
Proposal 194: Oppose	Proposal 195: Support	Proposal 196: Support	Proposal 197: Support
Proposal 198: Support	Proposal 199: Support	Proposal 200: Support	Proposal 201: Oppose
Proposal 202: Oppose	Proposal 203: Oppose	Proposal 204: Oppose	Proposal 205: Oppose
Proposal 206: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose

Proposal 214: Oppose	Proposal 215: Support	Proposal 216: Oppose	Proposal 217: Oppose
Proposal 218: Oppose	Proposal 219: Oppose	Proposal 220: Oppose	Proposal 221: Oppose
Proposal 222: Oppose	Proposal 223: Oppose	Proposal 224: Oppose	Proposal 225: Oppose
Proposal 226: Oppose	Proposal 227: Oppose	Proposal 228: Oppose	Proposal 229: Oppose
Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose	Proposal 233: Oppose
Proposal 234: Oppose	Proposal 235: Oppose	Proposal 236: Oppose	Proposal 237: Oppose
Proposal 238: Oppose	Proposal 239: Oppose	Proposal 240: Oppose	Proposal 241: Oppose
Proposal 242: Oppose	Proposal 243: Oppose	Proposal 244: Oppose	Proposal 245: Oppose
Proposal 246: Oppose	Proposal 247: Oppose	Proposal 248: Oppose	Proposal 249: Oppose
Proposal 250: Oppose	Proposal 251: Oppose	Proposal 252: Oppose	
Proposal 253: Support With Amendments	Proposal 254: Oppose	Proposal 255: Oppose	

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

I have owned property on the river since 1979 and witnessed the decline of the kings personally these fish must be protected no matter what the cost, cut the politics and money out of the equation and do what's best for returning these king runs back to what they once was

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

ron tomlinson
soldotna, AK

Submitted by: Mark Tornai
Community of Residence: Soldotna

My comments are in reference to Upper and Lower Cook Inlet. Proposal 6,10, 11, 18-24, 29 and 75-90. I am resubmitting my testimony, because there was a typo. I meant to say, open the Kenai up to bait for silvers on Aug 15th, not July 15th. See corrected testimony attached.

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Oppose	Proposal 86: Oppose
Proposal 87: Oppose	Proposal 88: Oppose	Proposal 89: Oppose	Proposal 90: Oppose

See attached document in reference to proposals 6, 9, 10, 11, 18 - 24, 29, and 75 thru 100.

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose
Proposal 82: Oppose	Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Oppose
Proposal 86: Oppose	Proposal 87: Oppose	Proposal 88: Oppose	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Oppose	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Oppose
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Oppose	

February 04, 2024

Dear Chairman Wood and Board of Fisheries members:

My name is Mark Tornai, from Soldotna, AK. I have been sport fishing on the Kenai peninsula, Cook Inlet and Kachemak Bay since 1990 with friends and family. I am an avid offshore sport fisherman, and river fisherman throughout the peninsula. We (the board of fish, commercial fishermen, and sport fishermen) should do everything we can to conserve our resources and protect the early and late run King Salmon, put the fish first! I believe the controls the Board of Fisheries put in place over the last several years has helped to reduce the take of spawning king salmon. Rarely do I catch a spawning king off shore. If I do hook one, I release it immediately without taking it out of the water. I truly believe in the conservation of our special resources and the King salmon in our streams. My comments pertain to multiple proposals for the Upper and Lower Cook Inlet. Those proposals are 6, 9, 10, 11, 18 - 24, 29, and 75 thru 100.

Now is not the time to expand commercial fishing or lower escapement goals. Put the fish first and allow more fish onto the spawning grounds. These are my recommendations :

- Shut down the set netters on the East side of Cook Inlet if escapement goals are not expected as per the current Management Plan
- Re-evaluate and allow the drift fishing fleet in Cook Inlet to harvest the sockeye in areas that will minimize impact to the East side spawning kings.
- Close offshore sport fishing for King salmon North of the latitude of Bluff Point in Cook Inlet on May 15th - July 15, as this has been done in the past and proven to be effective.
- Reduce the offshore King Salmon limit to one per day for the entire year, with no annual limit, in Kachemak Bay zone, something needs to be done now before we ruin this fishery.
- Allow bait in the Kenai River for Silver salmon on August 15th, single hook only.

Sincerely,
Mark Tornai
Soldotna, AK



February 7, 2024

RE: UCI Proposal 167

Dear Alaska Board of Fisheries Members,

Thank you for your service to the State of Alaska and our fisheries. We know you have a complex and demanding job, and we thank you for the time and energy output into reviewing and considering Board of Fisheries proposals.

Please accept this letter on behalf of Trout Unlimited (TU) in support of Proposal 167. TU is the nation's largest hunting and angling organization dedicated to cold water conservation with more than 1,100 members and roughly 20,000 supporters that live and work throughout Alaska. TU members have incredible experience in the field, spending many hours fishing, hunting and recreating on Alaska's rivers each year. We also have dozens of business members who own and operate Alaska businesses. They include both sport-fishing businesses and commercial fishing operations that depend on Alaska's healthy and vibrant wild salmon and resident fish populations, which allow them to continue to contribute to our state and local economies. TU has active volunteer chapters in Fairbanks, Anchorage, the Mat-Su, on the Kenai Peninsula, and in Southeast Alaska and 13 staff who live in Alaska and who are dedicated to caring for Alaska's incredible fish habitat. Our mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon.

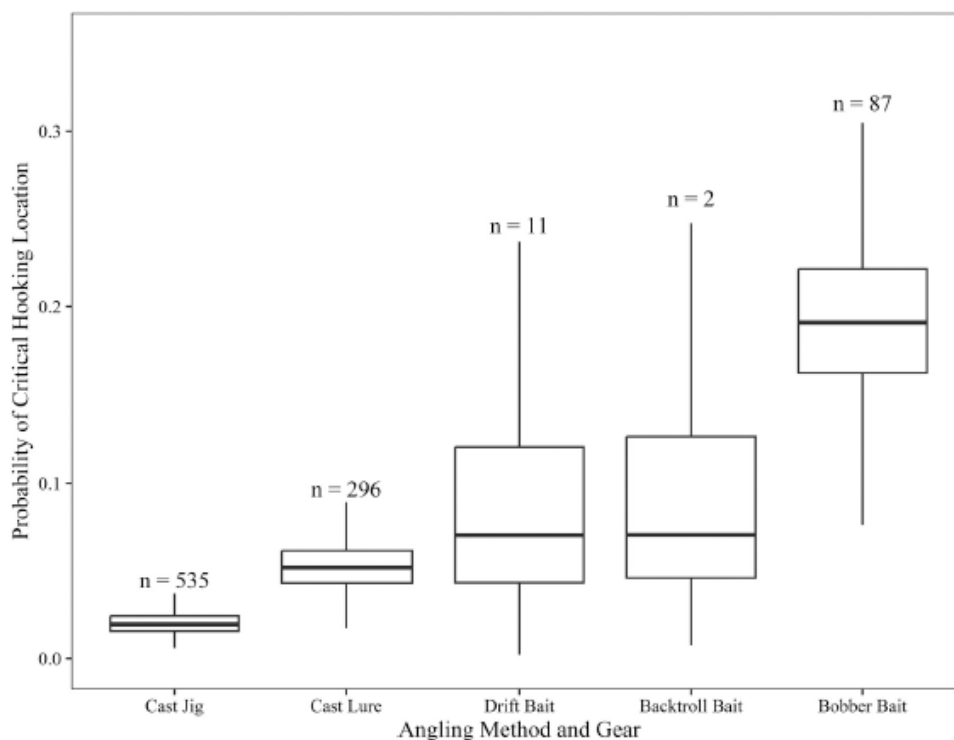
We have an active presence on the Kenai River, supporting our local chapter, participating in education programs, coordinating restoration work, and hosting our Kenai Guide Ambassador program. The basis of our programs is to help exemplify, educate, and advocate for taking care of the fisheries in the area that so many Alaskans depend on.

The Kenai River is beloved by Alaskans and visitors alike and fishing regulations and management decisions on the river have had to evolve and adapt to changing ecological and societal conditions. In order to protect these beloved fisheries, several areas of the Kenai River have long been limited to unbaited, artificial, single hook lures to prevent unintentional damage and mortality to both anadromous and resident fish. Proposal 167 seeks to update and expand the areas and durations of time where this type of fishing should occur. Specifically, the proposal would only allow fishing with an artificial, single-hook lure from January 1 - December 31 in the Kenai River from the ADF&G regulatory marker 100 yards below the Moose River confluence upstream to ADF&G regulatory markers at the outlet of Skilak Lake.

Studies have shown that fishing with bait significantly increases mortality in both rainbow trout and coho salmon due to the increased likelihood of being hooked in critical locations (e.g. gill rakers, esophagus, tongue, or stomach) which can cause a substantial increase in bleeding. In their study of post-release rainbow trout mortality, Schisler and Bergerson (1996) found bait analogues (scent-impregnated artificial eggs) fished

passively (on a slack line) resulted in 32.1% mortality, compared to 3.9% of fish caught with an artificial fly. The authors also reported 78.3% of the fish hooked on passively-fished bait analogues and 45.7% of the fish hooked on actively-fished (on a tight line) bait analogues were hooked in critical locations, compared with less than 4% of fly-caught fish being hooked in a critical location.

In their recent study of catch-and-release survival of salmon and steelhead as a function of gear type and angling methods, Courter et al (2023) found a nearly 10-fold increase in the probability of hooking coho salmon in a critical location when using a bobber and bait rig (passive bait) when compared to cast jigs and lures (see chart). Vincent-Lang et al (1993) found hook location in sport-caught coho salmon significantly affected survival rates and estimated an 11.7% mortality rate for in-river coho salmon caught with bait. In the introduction of this study, the authors point out “Many salmon sport fisheries are conducted with bait, a practice which has been shown to result in high mortality rates for resident fish (Hunsaker et al., 1970; Wydoski, 1977; Warner and Johnson, 1978)”.



Critical hook probability for coho salmon by combination of angling method and gear type. n = sample size for each angling method and gear type combination. Coulter et al, 2023.

The studies mentioned above are based only on a single hooking event, let alone instances where a fish might be hooked multiple times. ADFG’s annual Sport Fishing Surveys show that the Kenai River experiences the highest number of angler- days fished statewide. With this high pressure, the likelihood of fish being caught multiple times would not be uncommon and inevitably would also increase the rate of mortality and fitness. Neither anadromous nor resident stocks of fish can sustain this level of pressure. The section of the Kenai River referred to in Proposal 167, is not only where Coho stage during the later periods of their lifecycle, but also where ADFG’s Fishery Management Report NO. 20-01 states the highest number of resident species are caught. ADFG’s Fishery Management Report No. 20-01, also states that most of Kenai River Coho are being

harvested below the Moose River confluence. With this understanding the collateral damage inflicted on resident species as well as coho, due to multiple baited hooks above the Moose River confluence, is unnecessary; and the complexity of this fishery should be taken into consideration in how it is managed.

As mentioned previously, Trout Unlimited Alaska's mission is to conserve cold-water fisheries and their habitat here in Alaska. While we recognize that fishing with bait is important in many rivers and fisheries, this proposal will still leave ample opportunity to harvest coho while at the same time adding a layer of protection during a vulnerable life stage for fish not put in the freezer, as well as resident species. The science indicates there is a high probability of increased mortality in both coho and resident species by fishing with bait in the area described in proposal 167. By keeping the fishing gear we use in the stretch of river to a single, unbaited artificial lure, we can help minimize our impact on spawning coho (who are typically past their eating prime) and resident fish until more research can be done. It is in our best interest to manage this fishery conservatively, so we don't end up in a similar situation to what we are currently in with king salmon.

With all this in mind we hope you will consider supporting Proposition 167. Please let us know if you would like to discuss this issue further and thank you, again, for your attention to this issue important to sustaining one of our state's most beloved fisheries.

Sincerely,



Nelli Williams

References:

Courter, I. I., Buehrens, T., Roes, M., Blackman, T. E., Briscoe, B., & Gibbs, S. (2023). Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington. *Fisheries Research*, 268, 106848.

Schisler, G. J., & Bergersen, E. P. (1996). Postrelease hooking mortality of rainbow trout caught on scented artificial baits. *North American Journal of Fisheries Management*, 16(3), 570-578.

Vincent-Lang, D., Alexandersdottir, M., McBride, D., 1993. Mortality of coho salmon caught and released using sport tackle in the Little Susitna River, Alaska. *Fish. Res.* 15, 339–356.

Lipka, C. G., J. L. Gates, and S. K. Simons. 2020. Sport Fisheries of the Northern Kenai Peninsula Management Area, 2016–2018, with overview for 2019. Alaska Department of Fish and Game, Fishery Management Report No. 20-01, Anchorage.

Submitted by: Nathan Tueller
Community of Residence: Anchorage

I am opposed to Proposal 43. As a lifelong sport and commercial fisherman in Lower Cook Inlet, Prince Williams Sound and the gulf of alaska, I can unequivocally state that the salmon hatchery programs are beneficial to the state of alaska and it's salmon runs.

The economys of alaskas costal towns depend on the hatcherys to produce the volume necessary to both provide opportunities for commercial fishermen, and to reduce pressure on wild runs.

The economic turmoil that this radical reduction in hatchery production would cause the fishermen and the costal towns of alaska cannot be emphasized enough. They are an integral part of the southcentral alaska salmon ecosystem and economy.

I believe these neverending proposals are funded by outside interests who have little understanding or concern as to how these changes would negatively effect our state. It is frustrating that it has to be revisited every BOF cycle.

Stay the course. Leave the management plan alone. Reject proposal 43.

Proposal 43: Oppose

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, commercial, sport, and personal use fisheries in Soldotna, Alaska. I am thankful for Alaska's robust hatchery programs and think they should be expanded to provide more salmon for an ever-growing demand from our vital tourist industry, personal use fishermen (myself included) and subsistence users. While pink salmon are harvested primarily as a vital protein source by commercial fishermen, why not also provide more chinook, coho and chum salmon for river systems in distress like the Yukon, Kuskokwim, Matanuska and Susitna? Instead, we have proposals, out of turn, that would irreparably harm coastal communities and fishing families that depend on sustainability minded- hatchery operations for an economically viable fishery.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level

allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) **Lack of Scientific Evidence:** Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) **Steady Increase in Wild Salmon Returns:** Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Abigail Turner

[REDACTED]

Soldotna, Alaska



Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

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

USAG On Proposal 43

United Southeast Alaska Gillnetters **oppose Proposal 43**. We understand that adoption of this proposal will result in steep declines in economic activity and in opportunity for sport/personal users.

Commercial fishermen, processors, regional hatchery associations, charter operations, and the State of Alaska, all stand to lose. Commercial fishermen will harvest less, processors will sell less, hatchery associations will lay people off, charter operators will have reduced opportunity, and the state will lose raw fish tax revenues.

Hatcheries have in many cases created opportunity where there was none or minimal for personal use and sport fisheries. The preferred species, king and coho, are also the most expensive to raise, and would definitely see reduced production if this proposal were adopted. In our estimation, the benefits of hatchery production to coastal communities are immense. The reasoning in this proposal gives us no reason to think otherwise. There appears to us to be a lack of empirical evidence to support the harms indicated by the proposer, and given the source of the proposal (probably the most non-coastal community in the state), they probably underestimate the impacts that reducing production by such draconian measures would have on the people who actually live and do business in coastal communities.

Again, we are a hard no on proposal 43. We appreciate the opportunity comment.

Thanks,

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

Max Worhatch, Executive Director



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:
OSM.24016

FEB 06 2024

John Wood, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Wood:

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the 181 proposals being considered at the Upper Cook Inlet Finfish meeting from February 23 – March 7, 2024. The attached comments from OSM regard proposals that are likely to impact federally qualified subsistence users or associated fisheries resources within Federal subsistence management jurisdiction.

Other proposals being considered during this meeting may also affect Federal subsistence fisheries and users. Most of these other proposals involve fisheries that are outside of Federal jurisdiction and some of them involve areas of overlapping State and Federal jurisdiction. Adoption of these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. OSM may wish to comment on other items that impact federally qualified subsistence users.

We appreciate the opportunity to provide input on these important regulatory matters and look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Amee Howard
Acting Assistant Regional Director

Enclosure

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

**COMMENTS TO THE
ALASKA BOARD OF FISHERIES**

**Upper Cook Inlet Finfish Meeting
February 23–March 7, 2024
Anchorage, Alaska**

Office of Subsistence Management (OSM)

PROPOSALS 86, 165, 166, 167, 178, 179, 180, 181

Proposal 86 - Prohibit bait in the Kenai River through Oct 31 if the king salmon sport fishery is closed by EO.

Proposal 165 - Allow sport fishing in the Kenai River with only one unbaited, single-hook, artificial lure from January – July.

Proposals 166 - Expand time and area waters of the Kenai River are limited to only one unbaited, single-hook, artificial lure and redefine “artificial fly”.

Proposal 167 - Expand time and area in waters of the Kenai River that are limited to only one unbaited, single-hook, artificial lure.

Proposal 178 - Reduce the season for the Kenai River Coho Salmon sport fishery.

Proposal 179 - Close additional flowing waters of the Upper Section Kenai River Drainage Area from the Sterling Highway bridge at the outlet of Kenai Lake, downstream to Sterling Highway Mile 53 Bridge to sport fishing from January 1 – June 10.

Proposal 180 - Close waters of the Kenai River from the Sterling Highway Bridge at Mile 53 upstream to Kenai Lake to sport fishing from January 1 – April 1.

Proposal 181 - Close waters of the Lower Section Kenai River from an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake from January 1 – June 10.

Current Federal Regulations:**50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.***(a) Definitions*

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(xix) A rod and reel; and

* * *

50 CFR §100.27(e)(10) Subsistence taking of fish. Cook Inlet Area

(i) General area regulations.

* * *

(L) Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein or by issuance of a Federal special action.

* * *

(iii) Seasons, harvest limits, and methods and means for Kenai River fisheries.

* * *

(A) Kenai River dip net or rod and reel; salmon.

* * *

(2) You may take sockeye, Chinook, coho, and pink salmon through a dip net or rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided in this section.

(i) For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for Chinook salmon prior to July 16 (unless otherwise provided for in this section), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released.

(ii) *At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15 through August 31.*

(iii) *At the Kenai River mile 48 site, dip netting is allowed while either standing in the river or from a boat, from Federal regulatory markers on both sides of the Kenai River at about river mile 48 (approximately 2 miles below the outlet of Skilak Lake) downstream approximately 2.5 miles to a marker on the Kenai River at about river mile 45.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15 through August 31.*

(3) *Fishing seasons are as follows:*

Table 8 to Paragraph (e)(10)

Species	Size	Location
Sockeye salmon	June 15–August 15	All three sites
Chinook salmon	July 16–September 30	Kenai River sites only
Pink salmon	July 16–September 30	Kenai River sites only
Coho salmon	July 16–September 30	Kenai River sites only

(C) *Kenai River rod and reel only: salmon.*

(1) *For federally managed waters of the Kenai River and its tributaries, you may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage.*

(2) *Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.540), except for the following harvest and possession limits:*

Table 10 to Paragraph (e)(10)

Species	Size	Limits
---------	------	--------

Chinook salmon– (January 1 through July 15)	Less than 46 inches or 55 inches and longer	2 per day and 2 in possession.
Chinook salmon– (July 16 through August 31)	20 inches and longer	2 per day and 2 in possession.
All other salmon	16 inches and longer	6 per day and 6 in possession, of which no more than 4 per day and 4 in possession may be Coho salmon, except for the Sanctuary Area and Russian River where no more than 2 per day and 2 in possession may be Coho salmon.

* * *

(i) In the Kenai River below Skilak Lake, fishing is allowed with up to two baited single or treble hooks June 15 through August 31.

* * *

(D) Kenai River and tributaries under ice jigging and rod and reel; resident species.

(1) For federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, you may take resident fish species including lake trout, rainbow trout, and Dolly Varden or Arctic char with jigging gear through the ice or rod and reel gear in open waters. Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these resident species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.540), except for the following harvest and possession limits:

* * *

(2) For federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, you may take resident fish species including lake trout, rainbow trout, and Dolly Varden or Arctic char with jigging gear through the ice or rod and reel gear in open waters. Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these resident species under

Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.540), except for the following harvest and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Federal subsistence fishing seasons, areas, and methods and means sometimes default to State of Alaska sport fishing regulations. Adopting any of these proposals would aid in the conservation of species but would limit opportunity for Federally qualified subsistence users to some degree because of this coupling of Federal and State regulations.

Federal Position/Recommended Action: OSM is **Neutral** on these proposals

Rationale: OSM supports measures to decrease mortality of populations during times of conservation concern. However, adopting any of these proposals would limit opportunity for federally qualified subsistence users because Federal subsistence regulations sometimes default to State sport fishing regulations. OSM is neutral because the Federal in-season manager could issue short-term special actions to restore Federal subsistence opportunity if necessary for the continuation of subsistence uses. Federal subsistence fisheries proposals could also be submitted during a future cycle to decouple Federal subsistence regulations from State sport fishing regulations, thereby permanently restoring Federal subsistence opportunity.

PROPOSAL 147

5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area.

Modify the Kenai River king salmon annual limit.

Current Federal Regulations: See comment above on proposals 86, 165, 166, 167, 178, 179, 180, 181

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Federal subsistence harvest limits will not be impacted were this proposal adopted. This proposal may help conserve Chinook Salmon and increase future harvest opportunity by federally qualified subsistence users. The reproductive potential of female Chinook Salmon is positively related to body size (Quinn 2005). Therefore, higher escapement of large-bodied female Chinook Salmon may increase the reproductive success of this population, which in turn, may increase the number of Chinook Salmon available for harvest by federally qualified subsistence users during future runs.

Federal Position/Recommended Action: OSM **Supports** Proposal 147

Rationale: OSM supports measures to reduce harvest during times of conservation concern. This proposal may increase future harvest opportunity for federally qualified subsistence users while also

helping to conserve Kenai River Chinook Salmon. Adopting this proposal is unlikely to negatively affect federally qualified subsistence users because Federal harvest limits for this species would be unchanged.

Literature Cited: Quinn, T. P. 2005. The behavior and ecology of Pacific salmon and trout. University of Washington Press, Seattle.



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February 7, 2024

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
[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 a proposal submitted to the Alaska Board of Fisheries (BOF) for deliberation at the 2024 Upper Cook Inlet Finfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) respectfully provides the following comments for the board's consideration **in opposition to Proposal 43:**

Proposal 43 – 5 AAC 40.820. Basic Management Plan

VFDA submitted public comments (PC248) in opposition to Proposal 43 for the 2023 Lower Cook Inlet (LCI) Finfish meeting. I have attached them for easy reference as well as RC045, which provided the source for my testimony on hatchery Pink Salmon numbers in the North Pacific Ocean.

These additional comments address clarifications made by the Fairbanks AC, and will share other pertinent facts and resource materials for the boards consideration as it deliberates this proposal.

At the LCI meeting, the Fairbanks Advisory Committee (FAC) submitted a clarification to Proposal 43 noted as RC021. In its RC, which was not approved by the AC at that time it was submitted, it clarified that Proposal 43 does in fact seek to cap pink salmon production **to** 25% of 2000 levels for both the Port Graham Hatchery and the Tutka Bay Lagoon Hatchery. The FAC makes it clear that their intent is to fully impose a 75% reduction in Cook Inlet Aquaculture Association hatchery pink salmon production, which if adopted by the BOF would have a crippling effect on its ability to operate and may certainly bankrupt CIAA and eliminate all the positive habitat restoration and personal use fishery benefits they provide.

The FAC continues to further unsubstantiated claims of an agreement by the hatchery operators to reduce hatchery production. Again, the proposers have not ever provided a record of any such agreement to reduce production that existed back in year 2000, nor any time thereafter. To the contrary, hatchery operators have no record of any such agreement and RC039, submitted by former hatchery executive Steve Reifensuhl, has been provided showing that this claim is an inaccurate account of the referenced meeting outcome.

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.

Much of the justification presented by the FAC and others to amend hatchery permits is an attempt to create a conservation concern by espousing that pink salmon are “*threatening entire ecosystems and other salmon and marine species*” and that “*wild salmon are starving*”. There is no scientific evidence that pink salmon, of hatchery origin or otherwise, are creating such a massive effect on marine ecosystems.

To address some of the recent scientific papers on ocean carrying capacity that are submitted as “proof”, Alaska’s PNP Salmon Hatchery Operators have provided an on time public comment titled *A Response to Synthesis Research*, which highlights many factors that should be considered when reviewing such papers regarding hatchery policy.

There is much misunderstanding of the hierarchy of pink salmon and more importantly hatchery pink salmon within the ocean environment. Here are a few things to consider:

- Pink salmon represent the greatest number, or abundance, of salmonids in the ocean in any given year, but not in biomass.

- Mortality is a significant factor in the first thirty to forty-five days of ocean life for pink and chum when mortality on average is between 50% to 90%.¹
- The vast majority of pink salmon in the North Pacific and Bering Sea are from wild populations, estimated at approximately 25 billion fry annually throughout the Pacific Rim for all salmonids. An additional 5 billion fry are hatchery pink and chum fry from Russia, Japan, and Alaska. The hatchery proportion in terms of abundance of all pinks is about 15%.²
- The biomass of hatchery pinks is an even smaller proportion, perhaps less than 5%.
- It has been recently quoted that during 1990–2015, hatchery salmon (Japan, Korea, Russia, and Alaska) constituted approximately 40% of the total biomass of adult and immature salmon in the ocean.
- It is correct to say that “of the total wild and hatchery adult and immature salmon biomass in the North Pacific, 40% is hatchery origin”. It is incorrect to state that 40% of pink, or pink and chum are Alaska's hatchery-originated salmon. Alaska's hatchery component of that 40% is closer to 20%, with Japan and Russia contributing the remainder.
- Of the five billion hatchery salmon released into the Pacific each year, Russia (pink & chum) and Japan (chum) release about three billion salmon fry while Alaska releases approximately two billion fry (pink & chum).
- From 1990 to 2015, pink salmon's immature and mature biomass (hatchery and wild) was around 800,000 metric tons, or 22% of total biomass.
- Therefore, the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%.
- In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Since then, biomass of salmon has increased current levels of 4-5 million tons, representing 4-8% of total nektonic biomass during period of high abundance.³
- In terms of total ocean nektonic biomass, salmon represents a small proportion. Prince William Sound hatcheries release about 800 million pink salmon fry or 3% of total pink salmon numbers in Pacific Rim. Extrapolation of PWS pink salmon biomass as a proportion of total nektonic biomass would be a tiny fraction of one percent.

Conclusion:

Recent scientific publication proposes, and unfortunately some members of the public readily accept, that pink salmon are of such high abundance (numbers of salmon) that they must be causing significant and harmful impacts, both long and short term, to the marine ecosystem. Lost in the discussion, or even outright ignored, is the fact that pink salmon biomass from all sources, both wild and hatchery, is relatively small among the total biomass of pacific salmonids, estimated at less than one quarter of the total estimate. When put into finer perspective against the enormity of the total nektonic biomass of the North Pacific, annual Prince William Sound hatchery pink salmon releases, the largest in Alaska at an average of 800 million fry, is estimated at less than one percent of the overall biomass. Why is this important as it relates to Proposal 43? Because the release of pink salmon fry from all CIAA hatcheries combined for 2022 totaled only 57 million fish.⁴

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 Proposal 43, and any other request to reduce hatchery production.** Thank you for your consideration.

Sincerely,



Mike H. Wells
Executive Director

¹ Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia

² Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

³ Shuntov, V. P., Temnykh O., and Ivanov O. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon (*Oncorhynchus spp.*). Russian Journal of Marine Biology 43:1–28

⁴ ADF&G - Regional Information Report No. 5J23-04

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November 12, 2023

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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

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,



Mike H. Wells
Executive Director

Submitted by: Benjamin Van Alen
Community of Residence: Juneau, Alaska

Thank you for accepting my comments IN SUPPORT OF PROPOSAL 43 - and all proposals seeking to moderate or curtail salmon hatchery operations in Alaska and around the North Pacific Rim.

Of all the conservation, allocation, environmental, and funding challenges we face managing salmon fisheries in Alaska, at least the State has full control over the number of salmon released from hatcheries.

Hatcheries are intended to supplement wild salmon populations, not supplant them. It is wonderful that we are now 50 years into our modern hatchery experiment. The null hypothesis is that “nature knows best” and the alternate hypothesis, the one we are trying to prove, is that “we can do better than nature in nature”. Can we ‘fix’ nature’s naturally ‘poor’ egg-to-fry survival ‘problem’ by artificially mating, rearing, releasing billions, and harvesting millions of hatchery salmon without harming wild salmon? Are there unintended ecological, financial, or allocative consequences?

There are only three problems with this experiment: 1) nature is always right, 2) biotic abundance is limited by the numbers of viable adults not the numbers of babies, and 3) the experiment is a waste of money in the first place. Nevertheless, this experiment helps us understand: 1) that nature is always right; 2) the factors limiting biotic abundances, and 3) that hatcheries have no place in sustaining wild salmon and the fisheries that depend on them.

I include a set of “No Free Lunch” PowerPoint slides to help justify my assessment that hatcheries have no place in modern salmon management. These slides extend and complement the “Wild, Natural, Sustainable... or Hatchery” slides I included with my comments to the 2023 Lower Cook Inlet Board of Fish meeting.

Lastly, permitting and managing salmon hatcheries is the responsibility of the Alaska Department of Fish and Game. I appreciate that the efficacy of hatcheries is being discussed in the Alaska Board of Fisheries’ open public process. It might be better if the Department had a ‘science panel’ with a similar open public process. Alaska’s constitution provides an important separation of responsibility for regulatory decisions affecting allocation (the Board) and those affecting conservation (the Department).

(See attached .pdf of "No Free Lunch" .pptx slides)

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No Free Lunch*

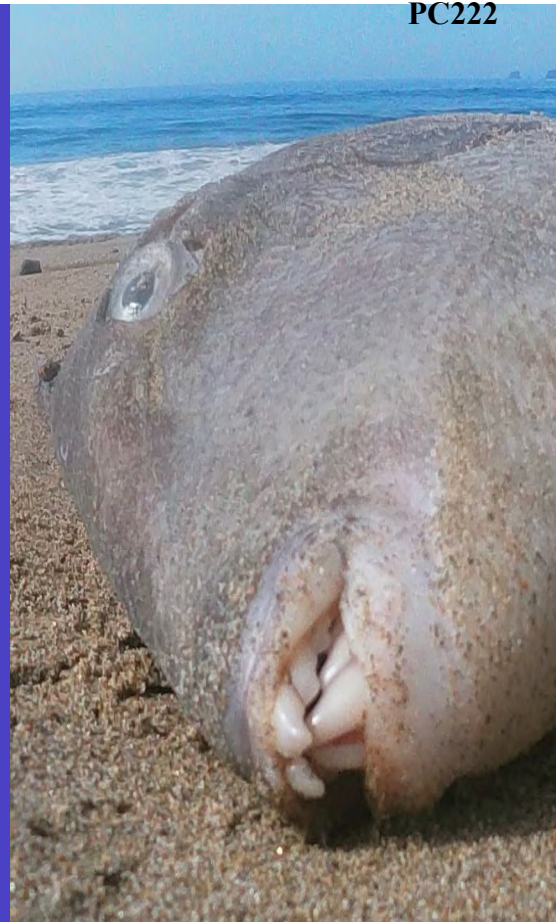
Slides in Support of Proposal 43
Upper Cook Inlet Alaska Board of Fisheries meeting
Anchorage, Feb. 23 - Mar. 6, 2024

Benjamin Van Alen

Wild Alaskan Salmon Biologist

February 6, 2024

*from: "There is no such thing as a free lunch" (Commoner, B. 1971. *The Closing Circle: Nature, Man, and Technology*. Bantam Books, New York.)



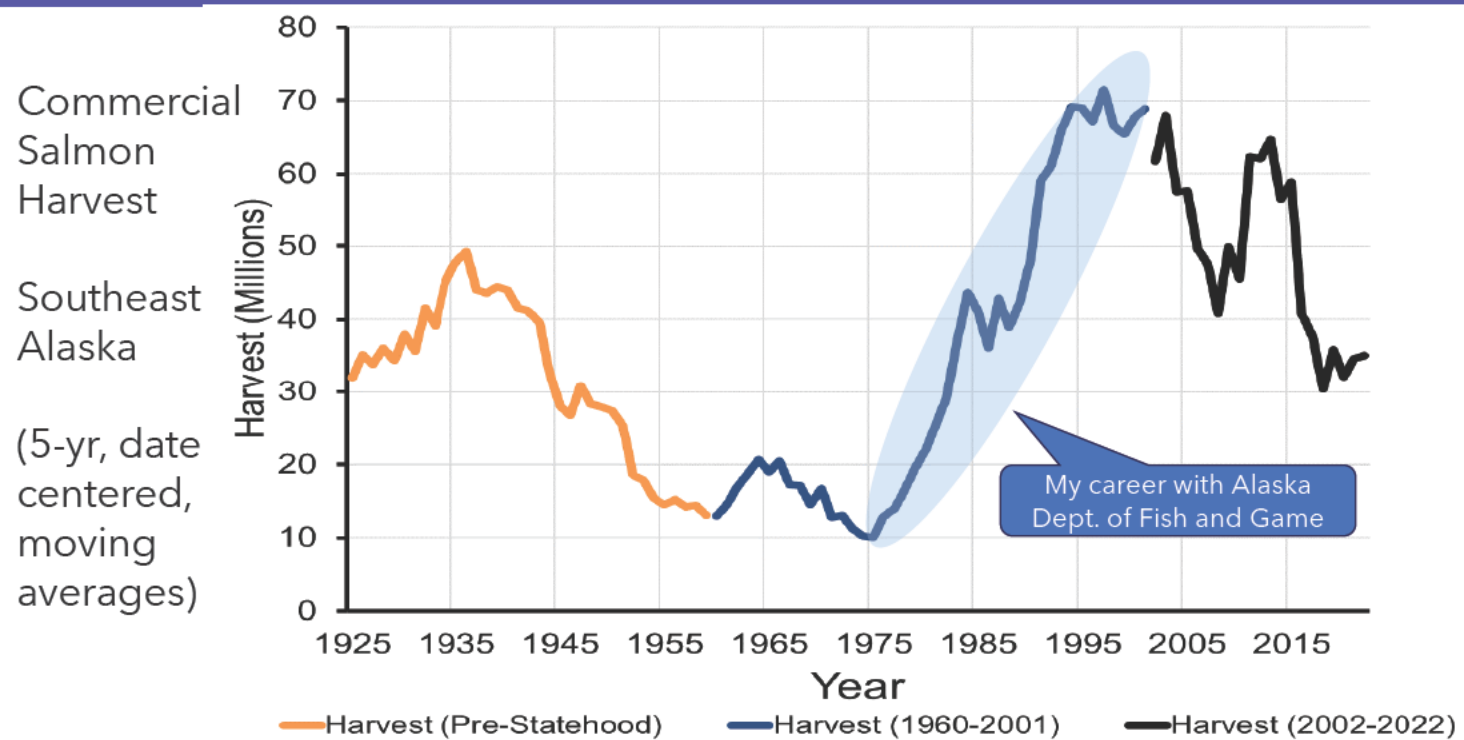
...but a free *Haiku*...

The Science of Science?

*Question everything,
you want to be proven wrong,
unless you're right, right?*

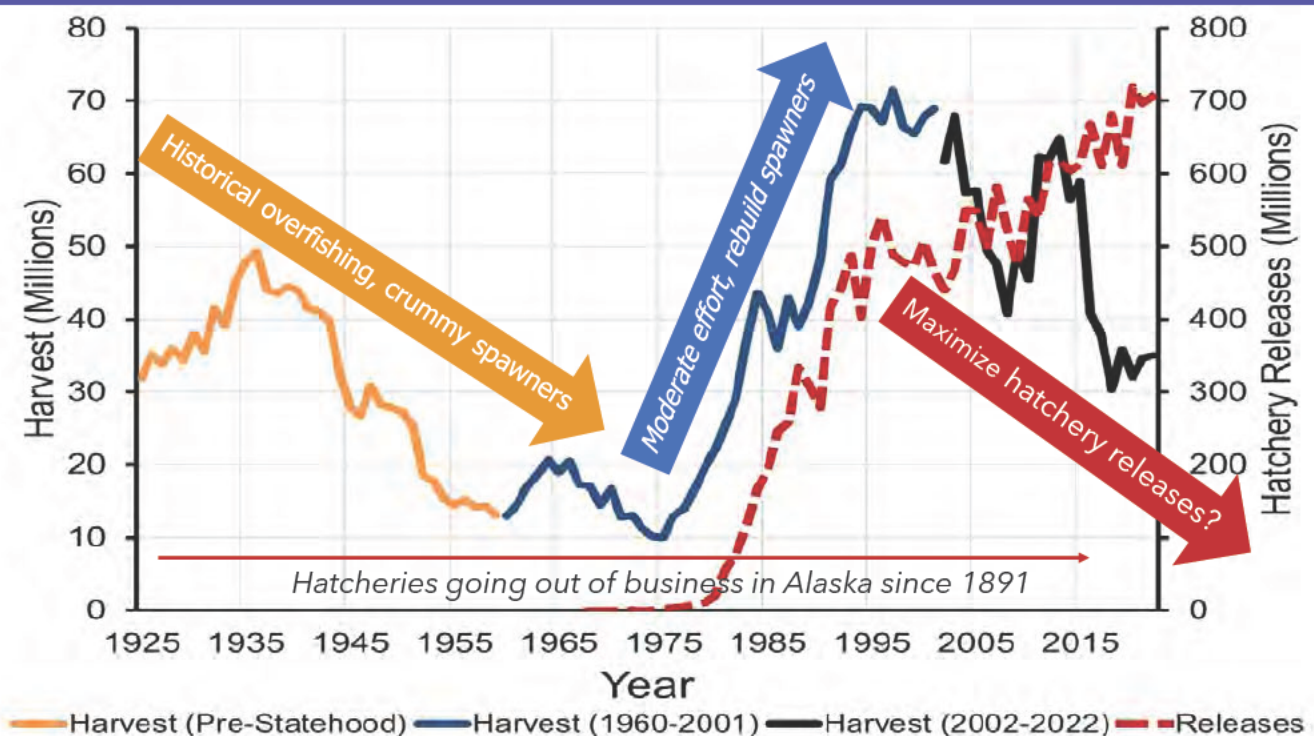
Everything I learned...

I learned questioning why this boom-bust-boom-bust



3

I learned...It takes wild spawners to make spawners



4

I observed, in Nature, that...

The **Carrying Capacity** for **Biota** is:

1. Limited — On our inorganic element-limited Earth

2. Already Filled with — No open niche

1. Locally adapted biota — Biodiversity

2. Competing/cooperating to rear — Fitness
viable offspring

3. Sustained by the recycling of
their nutrient elements — biogeochemical

Nature's "Laws of Biotic Sustainability"?

For all Biota?

On land and sea

5

Abundance is limited by:

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

not

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

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

6

Carrying Capacity

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



fewer babies



more rain, more sun



...not hungry anymore

7

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

• Control the Environment

- Control/remove what is naturally there
- Grow locally adapted seed/stock
- Limit seeding/stocking rates
- Manage
 - Nutrition
 - Water
 - Wastes
 - Pests
 - Diseases

• Fertilize*



*...and how is our "green revolution" reliance on synthetic fertilizers sustainable?

8

We eat cultivated food*



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

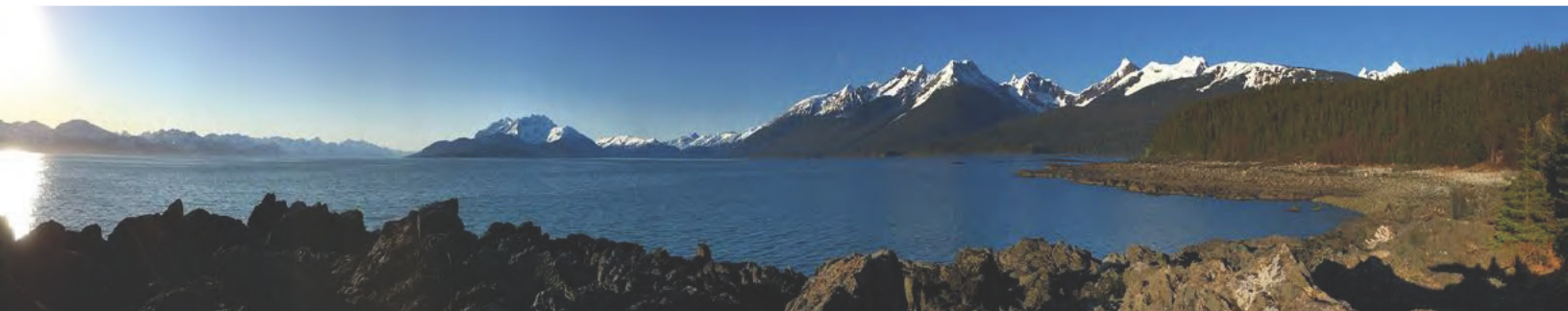
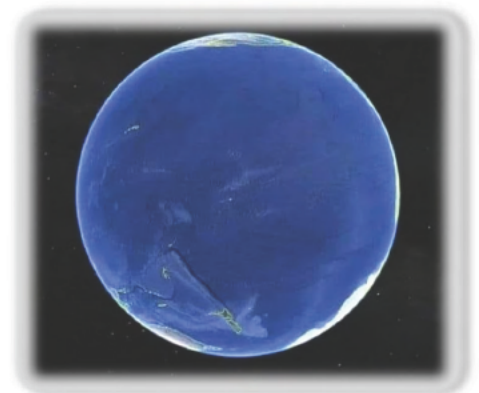
*what nearly all 8 billion people on Earth
mostly eat

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



The ocean *is* Nature - wild and uncontrollable

- Why assume free food from the Ocean?
- Because the Ocean is big and complicated?
- That Nature's "Laws of Biotic Sustainability" differ within the biosphere?
 - Lithosphere, hydrosphere, and atmosphere?



ecological overshoot w/ industrial fishing?

little "e.o."

Biota using ecosystem resources faster than they are being recycled

- Industrial-scale, one-way, removal of biotic nutrients out of an ecosystem
- Where on land has this proven
 - Ecological?
 - Sustainable?
 - Profitable?

Free food from the sea,
How could that be?

11

ecological overshoot w/ industrial hatcheries?

little "e.o."

Biota using ecosystem resources faster than they are being recycled

And the
"Blue Foods"
movement?

- The grazing of introduced biota that consume more nutrients than they recycle
- Where on land has this proven
 - Ecological?
 - Sustainable?
 - Profitable?

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

12

If biotic carrying capacity is...

- Limited
- Filled with locally adapted biota
- Sustained by the recycling of their nutrients

Then industrial fishing...

- Extracts nutrients
- Reduces carrying capacity

And we must...

- Moderate harvests
- Actively recycle nutrients*

*this ain't happening - go technology go?

Reefer Madness

*Keep taking food out,
without putting food back in,
how long kids fat, happy?*



If biotic carrying capacity is...

- Limited
- Filled with locally adapted biota
- Sustained by the recycling of their nutrients

Then industrial hatcheries...

- Put wild and hatchery fish in **direct competition** for **declining resources**

And we should...

- Close hatcheries
- Manage for wild habitat and spawners

*A double whammy
Ponzi scammy*



...and another free *Haiku*...

The Hatchery Fix?

*Fixing Mother Nature
Thousands of experiments
A waste of money*

15

Hatchery fish swim with wild fish and must...

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



Taking marine derived nutrients to the next trophic level.
(Eli Sheakley, Hoonah Indian Association fisheries technician)

Swimming "Buddies"
*You need to question
Hatchery interaction?
Only one ocean*

On **Wild** fish

16

We can fill the carrying capacity

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

Wild Salmon

*Spawn, die, nutrify
Nature's little upwellers
Life as we want it!*

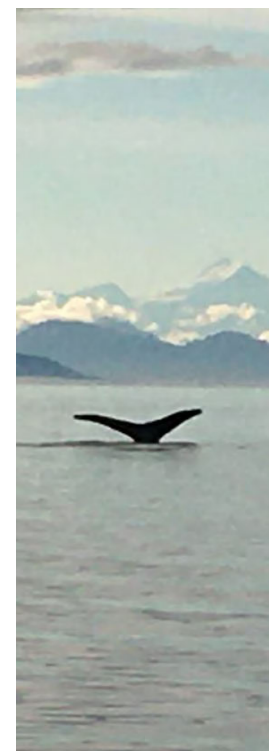


Insatiable Eli again, 10-years later

17

What if mega hatchery releases continue...

- Reduced ocean productivity
- Reduced fish production
- Reduced biodiversity, fitness
- Highly variable and declining survivals/returns
- Increased ecologic risk from
 - Hatchery problems
 - Water supply, disease outbreak, fitness
 - Climate changes, zoonosis
- Fatter whales, thinner wallets



18

In summary, Ocean Ranching is...

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

Nature Knows Best
*Doing in Nature
 So different than Nature
 Better than Nature?*

19

Best to spend some hatchery savings

- On assessment and management of wild stocks

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

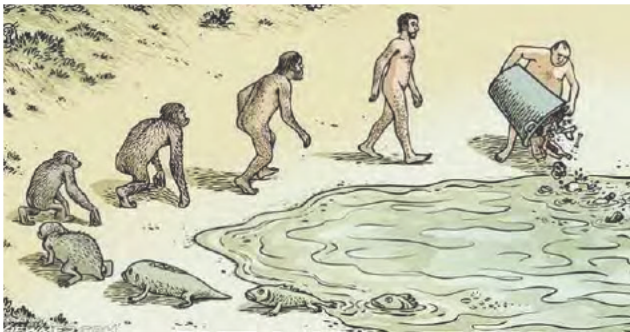


"If 10% of the money spent on hatcheries was spent on basic stock assessment of wild fish we'd have more fish and a management program to maintain them."
 (what I heard Dr. Brian Riddell, CDFO, say years ago)

20

Do we really need data to prove Nature right?

...for what happens naturally *is* the positive result of billions of experiments in the competition and cooperation among biota in the biosphere.



Nope, but...

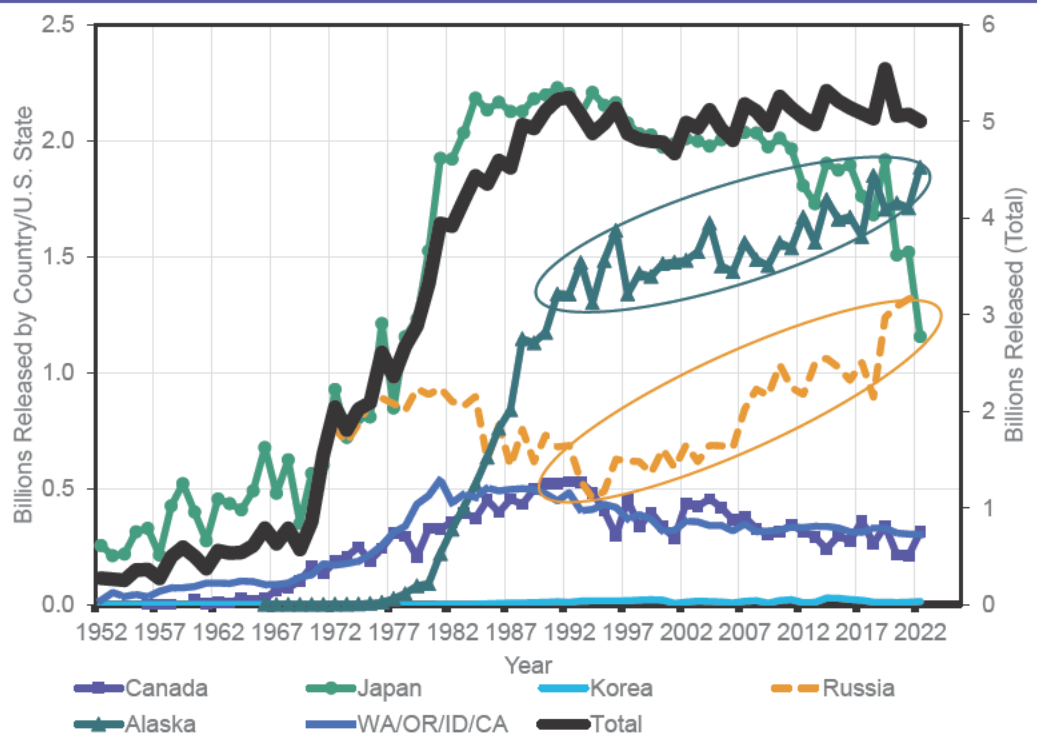
21

Observe and question... Huge hatchery releases in the North Pacific

Releases since 1989:

- Significantly* up
 - Alaska
 - Russia
- Significantly* down
 - Japan
 - Canada
 - WA/OR/ID/CA

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

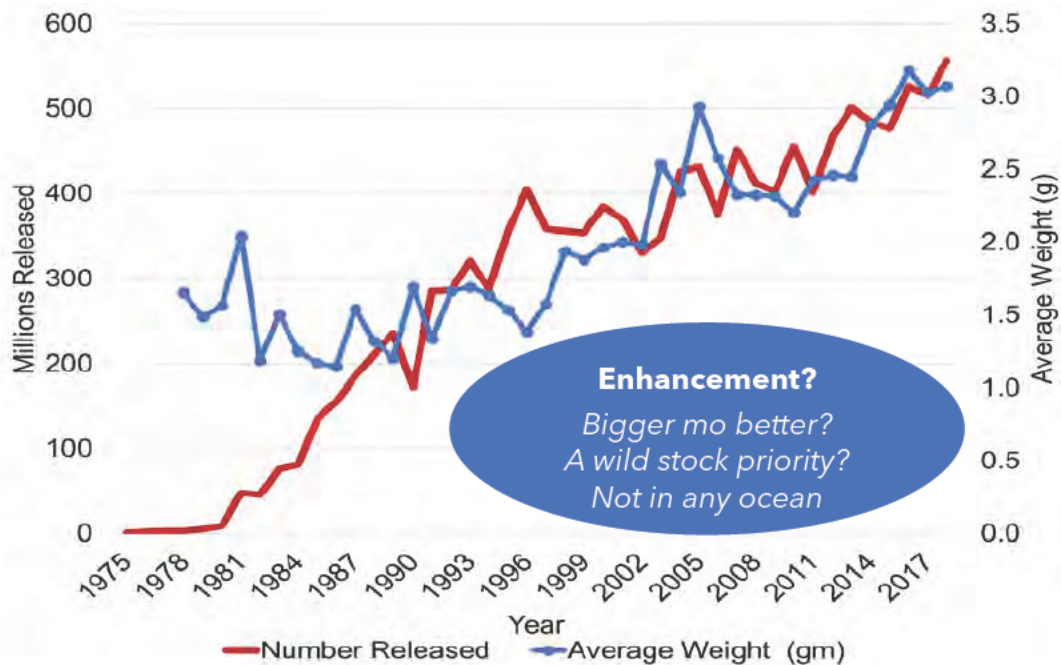


(Source: www.npafc.org January 2024)

22

SE Alaska hatchery chum - more & bigger

To have a survival advantage over wild fish?



(Source: www.adfg.alaska.gov)

23

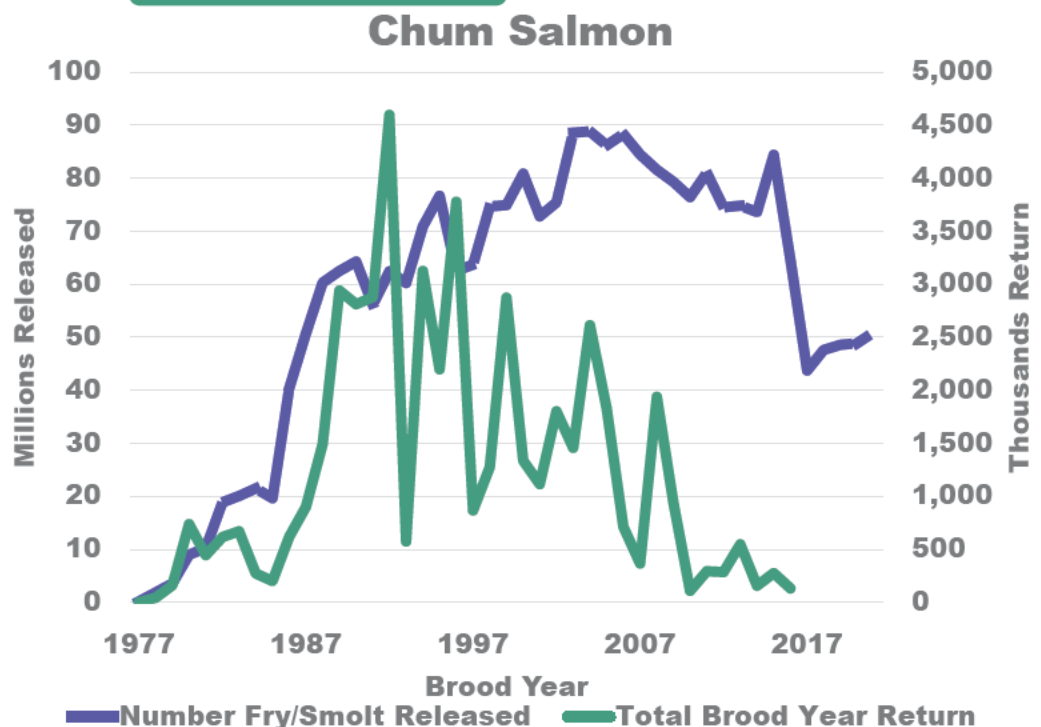
Hidden Falls Hatchery Chum

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



(Source: www.adfg.alaska.gov)

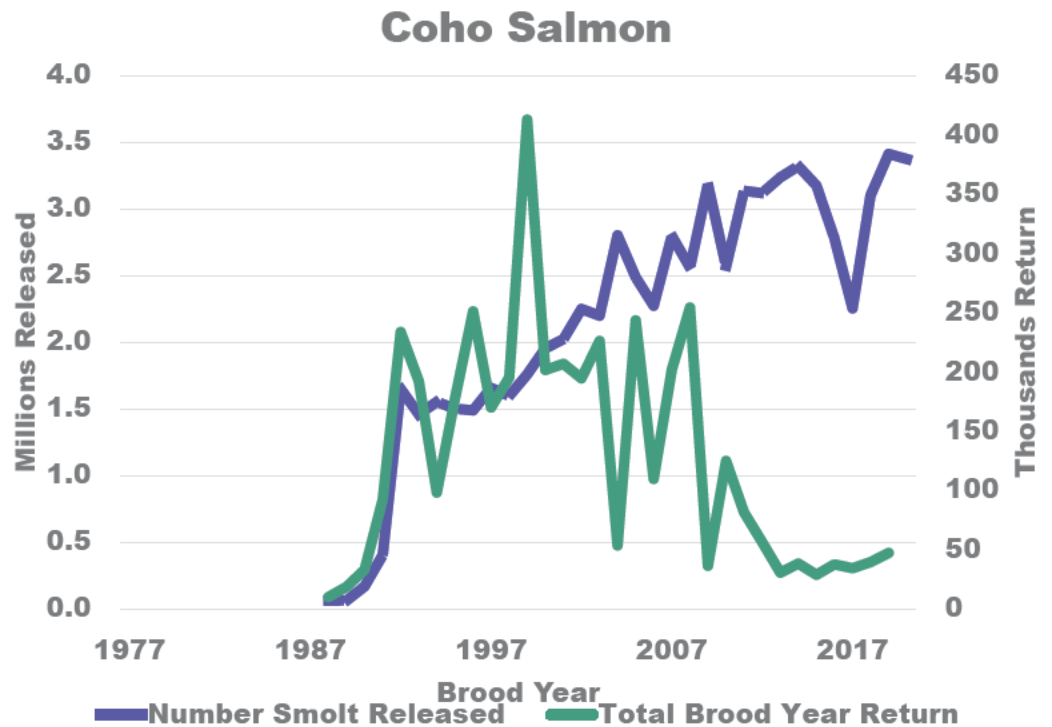
24

Hidden Falls Hatchery Coho

Boom and Bust

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

(Source: www.adfg.alaska.gov)



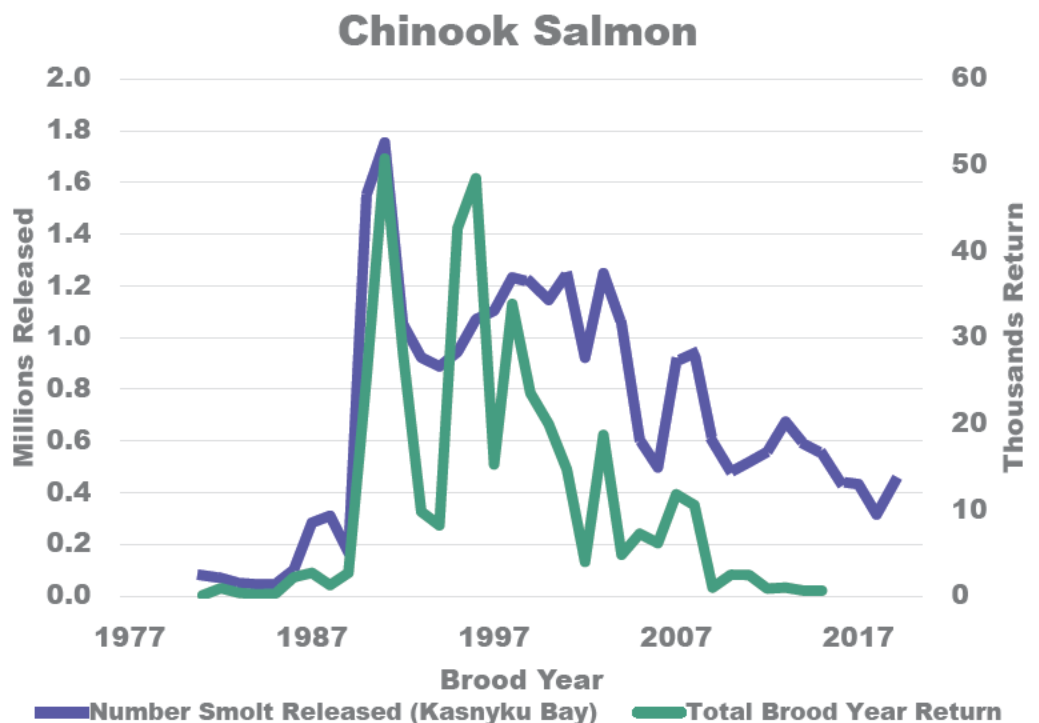
25

Hidden Falls Hatchery Chinook

Boom and Bust

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

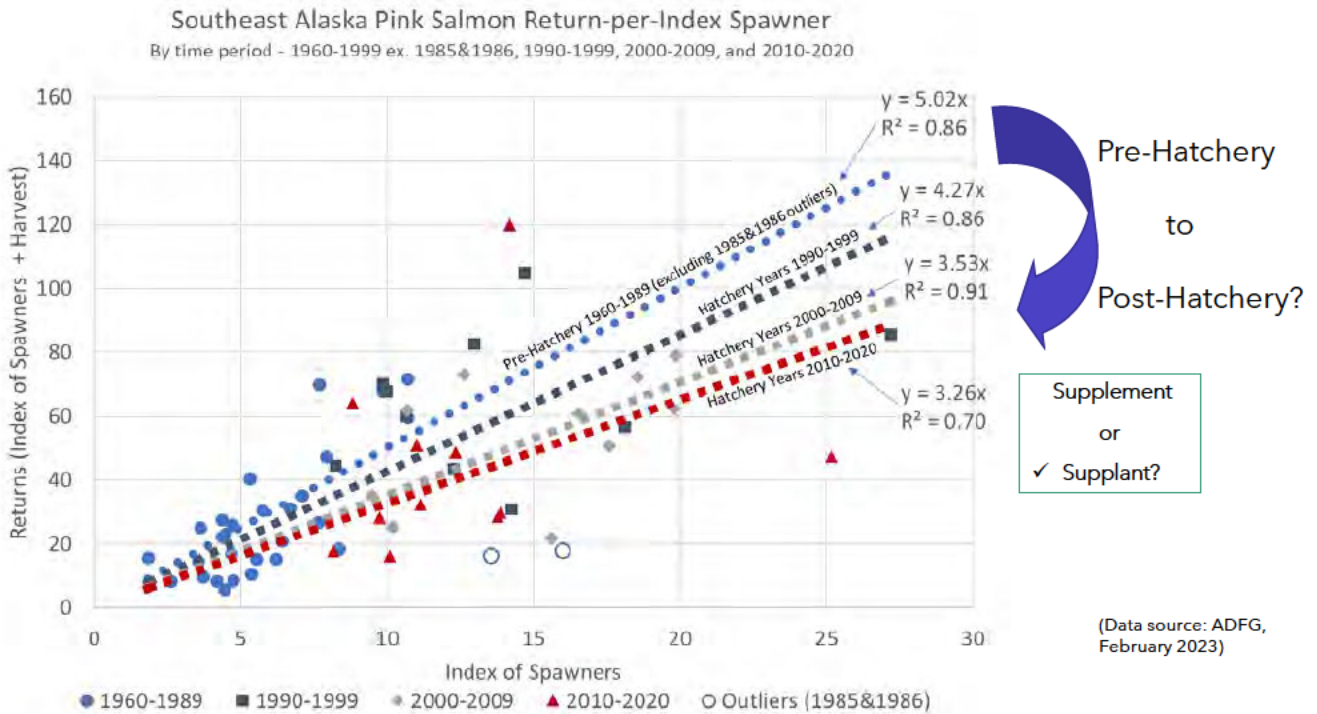
(Source: www.adfg.alaska.gov)



26

SEAK Pink Return-per-Spawner

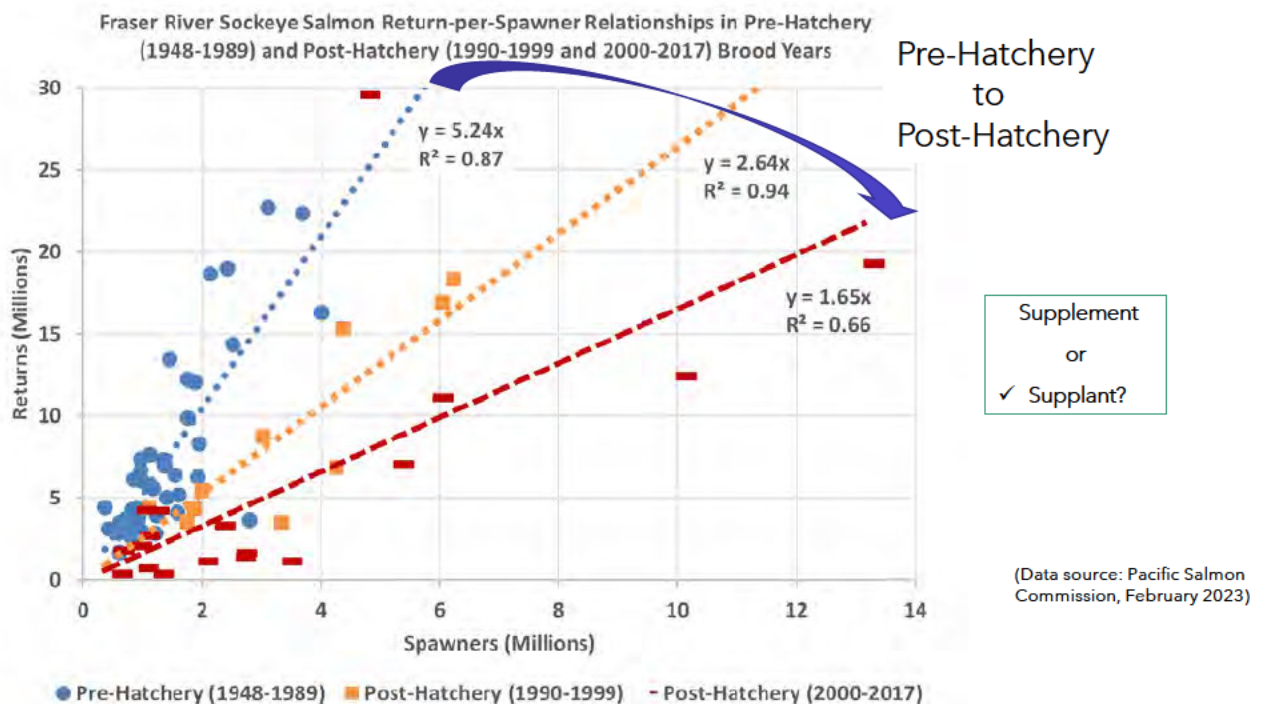
post-hatchery decline in productivity?



27

Fraser R. Sockeye Return-per-Spawner

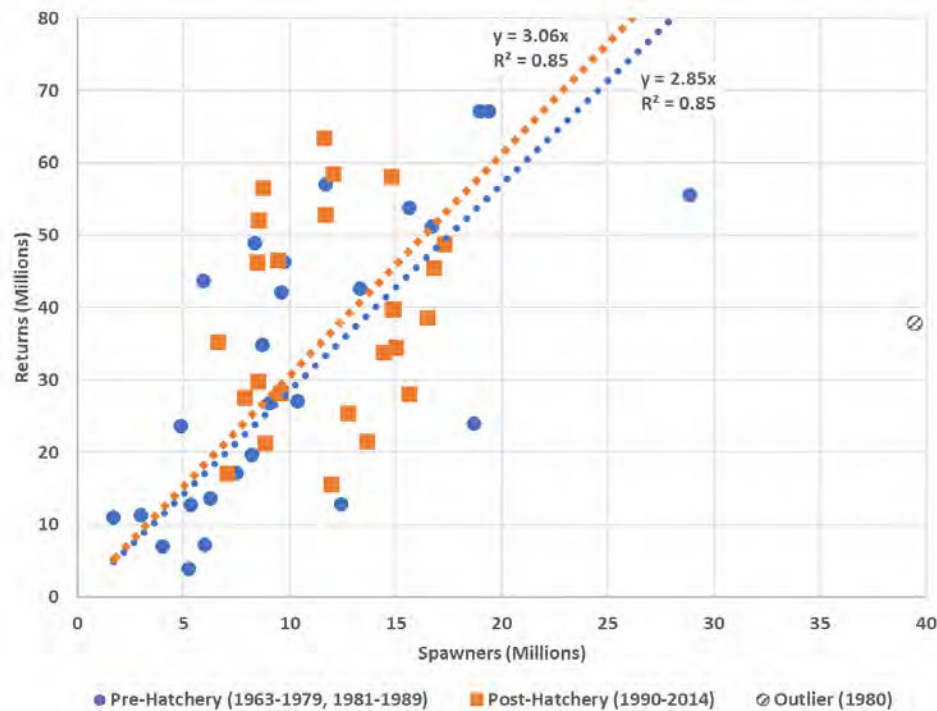
huge post-hatchery decline in productivity



28

Bristol Bay Sockeye Return-per-Spawner

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



Data source: ADFG,
February 2023

29

Sad sustainability

- Fisheries – always needing another stock to exploit
- Hatchery – always needing another bay 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?

30

Must run that biogeochemical cycle!

Industrial Fisheries - don't assume the ocean is?

- Too complicated
- There for the taking
- Sustained by propellers

Industrial Hatchery/Mariculture - don't assume the ocean is?

- Unlimited
- Open for immigrants
- Sustained by money



31

Biogeochemically balanced until... us technocrats prove there is 'No Free Lunch'



...a last free *Haiku*...

Technology Kills

*Better than Nature?
Ecological Overshoot
Better luck next time*

Of all the fishery, climate, and money woes we have,
... at least we have full control over hatchery woes!

33



Submitted by: Keenan Vonbirgelen

Community of Residence: Anchorage

Proposition 167

I am in support of prop 167. The state doesn't count our coho. The bait use in the upper river is detrimental to our resident rainbow trout and the dwindling coho stock. The high grading or filtering through inedible colored up staging coho to find your limit of table fair coho. The bycatch of rainbow trout with bait mortally wounds fish. Removal of bait will drastically reduce mortality of trout and our staging coho

Proposal 167: Support

Submitted by: DAVOD VOUGHT

Community of Residence: SOLDOTNA, ALASKA

SEE ATTACHED

[NO ATTACHMENT UPLOADED]

Submitted by: Parker Wallace

Community of Residence: Healy

Commenting on behalf of proposal 29:

I support this action, as someone who has enjoyed these road accessible fisheries for years I think it is of a good conservation mindset to limit the pressure on steelhead once they've surpassed a certain point. As stated the helicopter access is putting unnecessary stress on wintering fish that would otherwise simply not receive it. Therefore to further protect and preserve our precious native fish stocks, I see it only right to abolish the use of helicopter for commercial use on the lower Kenai Peninsula streams. It is exploiting a finite resource that will not handle the increase in stress and strain on the population, which is already compromised from historical numbers.

Due to the arc and trajectory of the fisheries up and down the Pacific Northwest in the last several decades I often wonder at our practices here in Alaska. Do we not want the same opportunities for our children and grandchildren that we have been afforded? I see them disappearing in my short lifetime and I believe it important to stand behind measures such as this.

It is not about more fish for one group or another but simply putting a stop to exploitation of vulnerable fish easily accessible in small water tributaries that would otherwise see mostly safe passage. The pressure in the areas mentioned is minimal at best without the commercial use of helicopters to access it. I believe it best left that way to ensure strong returns of steelhead on the Kenai Peninsula for generations to come.

Sincerely,

Parker Wallace

Submitted by: Michelle White

Community of Residence: Girdwood, Alaska

We need to protect our resident fish in this area of the Kenai. Trout species that are being caught with bait anglers during coho season are at risk and should be evaluated. This area of conversation (prop167) should be made no bait, artificial lure or flies only, single hook and size of the hook should be evaluated also. This is an important issue as I have first hand seen large trout caught and mishandled by salmon fisherman. We need to protect this fishery so it can be experienced for years to come.

Proposal 167: Support

Submitted by: Nathaniel Wilder

Community of Residence: Anchorage, AK

hello,

I am commenting in support of proposal 83. We need to be taking a much more conservative start to the late-run of king salmon coming into the inlet. Lowering the optimal escapement goal is counterintuitive to the survival of a salmon population with 4 years of low returns into its 7 year cycle. The sacrifice this population in favor of commercial and set-net interests is another chink in the armor of the existence of the king salmon in the state of Alaska. We have time to turn this around if we consider conservation before other interests. If the kings show

up in acceptable numbers after the OEG is reached, then commercial and set-net can be allowed. But a reasonable OEG like 30k returning fish is more realistic to the survival of the king population this river. Thanks for considering.

Proposal 83: Support

PC228

Submitted by: Jake Wise
Community of Residence: Homer

Good day,

I am a 3 rd generation sport and commercial fisherman. I am opposing proposal 43 for hatchery reduction in releases. Alaska department of fish and game has done a superb job at managing fisheries for the wild salmon escapement and returns i have seen record runs for wild salmon be broken several times in the last 10 years.

Proposal 43: Oppose

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman out of Homer, and I reside in Nikolaevsk. Salmon hatcheries play a major part of resources for salmon producers and any reduction in output of hatcheries will be a huge devastation to the fishing communities.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

Sergey Yakunin

██████████@██████████

Nikolaevsk/Homer, Alaska

Submitted by: Dennis Zadra

Community of Residence: Cordova, Alaska

These are my personal comments and not affiliated with any group or organization. I am adamantly opposed to Proposal 43 as our salmon hatcheries are a vital part of all salmon fisheries. I am very concerned about Amendment 16 to the Cook Inlet FMP and the implications that it brings. We would not be in this position if the Department of Fish and Game managed on the requirements of the Magnuson-Stevens Act. They do not. Managing for sustainability is not the same as Managing for MSY. With salmon fisheries the science is clear, both overfishing (too much harvest) and underfishing

(too little harvest) can jeopardize the capacity of a stock or stock complex to produce MSY on a continuing basis. The State's reallocation of the salmon resources to the PU fishery have created an environment where it is very difficult to manage to MSY. I am deeply concerned about the letter that the Commissioner presented to this Board in October asking to give him blanket authority to close down any State waters to commercial longlining for rockfish conservation. SB 209 speaks to the same mentality to allow blanket authority to place electronic monitoring on any vessel they choose. It is never a good thing when fisheries are managed on politics instead of biology. Thank you for listening to my point of view.

Proposal 43: Oppose

Submitted by: Phil Zander

Community of Residence: Kenai ak

On the opinion that hatchery fish aren't detrimental to wild salmon. Have you ignored all the research done by the state of Washington. Working at the hatcheries myself I saw first hand what a hatchery can do to a wild salmon population. Talk about taking away the survival of the fittest model. Once you start a hatchery for a fishery you will never have the original wild stock ever again. Ever. Plain and simple
