

PROPOSAL 170

5 AAC 40.XXX New Regulation.

Reduce the permitted egg take level of each hatchery permit containing pink and chum salmon by 25% of the current permitted capacity for those species, as follows:

What is the issue you would like the board to address and why? Currently, 30 salmon hatcheries are operating in the state. Twenty-seven facilities are operated by private nonprofit (PNP) corporations, which are funded primarily from the sale of a portion of hatchery returns. Of these, 11 are state owned and operated by PNPs on the state's behalf at no cost to the state. Non-PNP operated hatcheries include two sport fish hatcheries operated by the state and one hatchery operated by the Metlakatla Indian Community under federal regulation.ⁱ Most of these hatcheries have been operating since the Alaska Hatchery Act was adopted in 1974, authorizing private nonprofit corporations to own and operate salmon hatcheries to supplement wild salmon stocks and support fisheries.

The regulatory intent in the Act was to also protect wild salmon stocks. The Alaska Hatchery Act establishing the PNP Hatchery system was adopted in 1974. "Section 1. INTENT. It is the intent of this Act to authorize the private ownership of salmon hatcheries by qualified nonprofit corporations for the purpose of contributing, by artificial means, to the rehabilitation of the state's depleted and depressed salmon fishery. The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks." However, during the 50 years since the implementation of PNP hatcheries, there has been virtually no environmental review or cost-benefit analysis of the impacts of hatcheries and very limited oversight by Alaska Board of Fisheries.

State of Alaska law (Policy for management of sustainable salmon fisheries – 5 AAC 39.222) mandates that hatcheries shall operate without adversely affecting natural stocks of fish.

Assessing that impact is the Board of Fish responsibility. However, except for a 1977 authority given to the Board of Fisheries for salmon broodstock releases under a hatchery permit, there was no annual Board oversight on hatcheries between 1974 and 1999. In 1999, the first Board of Fish hatchery committee was established. The committee did not meet until 2001 but only for two years to establish protocols. Between 2003-2018 there were no Board hatchery meetings. In 2018, the Board adopted the Committee of the Whole (entire Board) which met for a full day since, except 2021 due to Covid. This means that for most of the 49 years of the PNP hatchery program, there was no public review or Board of Fish oversight.

With the severe and escalating decline of wild salmon stocks in both average size and abundance, there is ample peer-reviewed scientific evidence that hatchery salmon negatively impact wild salmon in many significant ways. For several years, different groups have been submitting proposals for hatchery egg take reduction as one of the responses to protect wild salmon. All those proposals were refused on the basis of lack of conclusive evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying.

However, there is over-whelming evidence of negative impacts with very little corresponding evidence to the opposite. “Hatcheries have long produced salmonids for fisheries and mitigation, though their widespread use is increasingly controversial because of potential impacts to wild salmonids. We conducted a global literature search of peer-reviewed publications (1970–2021) evaluating how hatchery salmonids affected wild salmonids, developed a publicly available database, and synthesized results. Two hundred six publications met our search criteria, with 83% reporting adverse/minimally adverse effects on wild salmonids. Adverse genetic effects on diversity were most common, followed by effects on productivity and abundance via ecological and genetic processes. Few publications (3%) reported beneficial hatchery effects on wild salmonids, nearly all from intensive recovery programs used to bolster highly depleted wild populations. Our review suggests hatcheries commonly have adverse impacts on wild salmonids in freshwater and marine environments.”ⁱⁱⁱ Since this synthesis was published in 2023, even more hatchery-impact papers have emerged.

While the Alaska Board of Fisheries has limited authority to provide injunctive relief on this issue, they can reduce hatchery egg take permitting levels. This is the only venue open to public proposals and the only recourse for the general public to debate or contest hatchery practices.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee Jeff Lucas, Chair

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