

PROPOSAL 156

5 AAC 33.364 Southeastern Alaska Area Enhanced Salmon Allocation Management Plan.

Reduce Southeast Alaska hatchery permitted pink and chum salmon egg take level by 25%, as follows:

The solution is very simple. Reduce the permitted egg take of pink and chum salmon of each applicable Southeast hatchery for pink and chum salmon by 25%.

What is the issue you would like the board to address and why? 25% reduction of current permitting levels of pink and chum hatchery egg takes in the applicable Southeast hatcheries.

There is significant evidence that there is an ocean carrying capacity that is exacerbated by the proliferation of Alaskan and Asian hatchery releases into the North Pacific. This is particularly important to Chinook salmon as stocks have declined dramatically all over Alaska. Chinook decline is so critical that the Yukon River may lose discrete stocks. An emergency Agreement between Canada and Alaska was signed April 1, 2024, to impose a drastic Chinook harvest moratorium of at least seven years. Sadly, the situation with Chinook on the Yukon River is now becoming a statewide problem; the Nushagak, the Kenai and many other Alaskan rivers have conservation plans in action because of declines. Emergency Orders to close Chinook sports fishing entirely in many of Alaska's most iconic river systems have already been implemented. While hatcheries are not the only factor in salmon decline, they are among the top five, including climate change, bycatch, intercept, disease, hatcheries.

The Alaska Board of Fisheries has limited authority to provide injunctive relief on this issue but to the extent that they can reduce hatchery egg take permitting levels, this is the only venue open to public proposals.

For several years, different groups have been submitting proposals for hatchery egg take reduction. All those proposals have been 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.

The Alaska Department of Fish and Game, which directs information to the Board of Fish, has been consistently reluctant to consider peer-reviewed research outside of the Department and to even evaluate their own internal research that indicates hatchery production can have an effect on the health of wild salmon stocks. The "iterative" process that the Department assures the public is watchdogging hatcheries is an inter-dependent process with hatcheries and therefore is not seen as sufficiently separated from hatchery production to apply significant oversight. This is an extraordinarily frustrating situation to many who depend on wild salmon stocks and are outside of the hatchery management systems.

CONCLUSIONS: The goal of Alaska's PNP hatchery system is economic, not conservation. In a 2011 international report *Shifting the Balance: Towards Sustainable Salmon Populations and Fisheries of the Future*, renown Canadian scientists Dr. Richard Beamish and Dr. Donald Noakes noted: "While Alaska's large ocean-ranching program may have contributed to the observed increase in catch, there remain many unanswered questions about potential negative impacts on

wild fish and deleterious effects on other Alaskan salmon fisheries (Hilborn and Eggers 2000; Clark et al. 2006; Knapp et al. 2007). As with most if not all large-scale hatchery programs, there is a lack of information to critically evaluate the program either with respect to its stated production objectives or other criteria (i.e., ecosystem interactions, etc.), and more research is clearly needed in that respect.”

In addition to on-going research on hatchery impacts, we also need an independent venue to review all the latest peer-reviewed science and to have an on-going dialogue on application of what we can have consensus on. The Board of Fish Hatchery Committee would be a good start as long as it is not an orchestrated situation. Prior to the next Southeast Board of Fish meeting, I will be working with many others to gather many supporting documents.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. Reduction of hatchery egg take (and thus releases) has long been the goal of the Fairbanks Advisory Committee as it has researched the negative impacts of hatcheries for years. This includes conversations with some of the top salmon scientists in Alaska, Canada and the Pacific Northwest, as well as conversations with stakeholders in AYK river systems.

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(HQ-F24-131)
