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**ALASKA BOARD OF FISHERIES**  
Statewide Finfish and Supplemental Issues  
Anchorage | March 17 - 21

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**Submitted by:** Kevin Abena

FV Big Blue

**Community of Residence:** Kodiak

To the Alaska State Board of Fish concerning regulatory proposals 163-165:

Proposal 163 - Current regulations prohibit bottom contact in state water trawl fisheries, both pelagic and non-pelagic gear types. NOAA currently understands that pelagic trawl gear is more often than not in contact with the seafloor. First, vessels participating in trawl state water fisheries are currently allowed to carry non-pelagic gear on a separate reel on the vessel. Non-pelagic gear should not be aboard an actively fishing trawl vessel in state water. Second, pelagic vessels in state waters deliver arrowtooth, halibut, cod, and other well identified bottom dwelling fish. That information is readily available from NOAA/NMFS. That would suggest these trawls are making bottom contact. Third, the economic impact of these fisheries do not justify the environmental impact from their fishing activities. Along with this, you have vessels participating in trawl EM that are actively incentivized to catch and sell non-target species(Rockfish in PWS) and sell. They are legally able to go over the MRA and sell their overage due to the new trawl EM regulations. Note - the state closed an area in PWS February 2026 due to approaching the rockfish trawl allocation in PWS.

Concerning this proposal and forcing the pelagic vessels to prove they are not making bottom contact, the electronic sounding technology (Marport is one example.) is already aboard most of these vessels to actively see their headrope and foot rope in relation to the bottom sounding. And yes, it's recordable. It would be very easy to submit this information to the NMFS for review or the potential review.

Proposal 164 - I spoke to this above. The technology is already on most all the vessels that participate in state water trawl fisheries.

Proposal 165 - This proposal is a no brainer. Yes, these trawls must have salmon excluders. The words Alaska and Salmon are synonymous, let's protect them both.

In closing, it's my belief that current age trawl gear with the horsepower in front of these massive nets has no business in state waters. Let's protect our crab, salmon, halibut, rockfish, coral, and ecosystems to ensure these species have the best opportunity to thrive. If pollock trawlers can't prove they are not making bottom contact, they should head outside of three miles to drag.

Thank you for your time and consideration.

Kevin Abena

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Waynr Ackerlund, and I am a salmon seine fisherman in Prince William Sound. I operate the F/V Tor through Ackerlund Fisheries, and my livelihood and business viability depend directly on hatchery production. If hatchery production is significantly reduced, it would be crippling to my livelihood and to the long-term sustainability of my fishing operation.

A reduction in hatchery production would also result in a loss of revenue across all supporting businesses that depend on a healthy and stable commercial salmon fishery. The economic ripple effects would extend beyond my vessel and crew to the broader community and industry that rely on consistent harvest opportunities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Waynr Ackerlund  
Valdez, Alaska



# Adak Community Development Corporation

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March 1, 2026

Alaska Department of Fish & Game  
 Board of Fisheries  
 Boards Support Section  
 P.O. Box 115526  
 Juneau, Alaska 99811-5526

## RE: Opposition to Proposal 11

Dear Board Members:

The Adak Community Development Corporation (“ACDC”), the non-profit economic development entity for Adak, Alaska is **opposed to Proposal 11**, for the reasons outlined further in this letter.

ACDC as part of its organizational charter and mission was allocated the community’s 10% of the Western Aleutian Islands Golden King crab quota, making ACDC a significant stakeholder in the subject fishery. As a recognized Community Quota Entity (“CQE”), ACDC has additionally made significant investments in the Pacific halibut and Sablefish/Black cod fisheries that are prosecuted in the same region; and the community of Adak is highly dependent on the Aleutian Islands Pacific cod fisheries. This provides ACDC with a deep, multi-species and data-based understanding of this proposal.

Our specific rationale for opposing this proposal is as follows:

**1. Proposal 11 will have a minimal impact on Aleutian Islands crab bycatch; but it will also push the trawl fleet into the Bering Sea, significantly increasing Pacific halibut bycatch.**

As Staff Comments point out, Golden King crab bycatch over the last six season as averaged 66 animals per year. The data shows that 2021 was an outlier with 396 animals harvested; if that year is dropped the annual average crab bycatch by the trawl fleet operating in state waters is less than one animal per year:

Table 11-5.—Aleutian Islands District reported commercial harvest by ADF&G fish ticket of golden king crab by groundfish trawl gear in waters west of long 170°W, 2020–2025.

Year	Vessels	Landings	State waters harvest		Federal waters harvest	
			Number of crab	% State waters	Number of crab	% Federal waters
2020	14	38	0	0.0%	4,936	100.0%
2021	11	37	396	5.8%	6,447	94.2%
2022	8	31	0	0.0%	3,350	100.0%
2023	11	37	0	0.0%	4,841	100.0%
2024	8	36	1	0.0%	3,581	100.0%
2025 <sup>a</sup>	9	17	0	0.0%	9,015	100.0%
<b>Average</b>	<b>10</b>	<b>33</b>	<b>66</b>	<b>1.0%</b>	<b>5,362</b>	<b>99.0%</b>

<sup>a</sup> Harvest through August 15, 2025.

The trawl-sector Pacific halibut bycatch rates in the Aleutian Islands are about 11.5% of the Bering Sea bycatch rate; pushing the trawl fleet deeper into the Bering Sea will exacerbate Pacific halibut bycatch:

Data from "car240\_psc\_halibut2019" sorted by CV Sector, Trawl Gear, Cod Target. A season, comparing AI Halibut mortality amounts to BS mortality amounts and rates

GEAR	BS REPORTING AREA	TARGET	WEEK	SECTOR	GROUND FISH (MT)	HALIBUT (KG)	RATE KG/MT	HALIBUT MORTALITY (MT)
NPT	509	Pacific Cod	1/26/19	Catcher Vessel	7,444	231,098	31.04	138.93
NPT	517	Pacific Cod	1/26/19	Catcher Vessel	1,981	58,923	29.75	33.92
NPT	519	Pacific Cod	1/26/19	Catcher Vessel	C	C	94.46	0.06
NPT	509	Pacific Cod	2/2/19	Catcher Vessel	6,077	189,400	31.17	125.23
NPT	516	Pacific Cod	2/2/19	Catcher Vessel	C	C	13.74	1.2
NPT	517	Pacific Cod	2/2/19	Catcher Vessel	1,879	44,029	23.43	25.99
NPT	517	Pacific Cod	3/2/19	Catcher Vessel	C	C	5.55	0.57
NPT	524	Pacific Cod	3/2/19	Catcher Vessel	C	C	4.76	0.01
NPT	509	Pacific Cod	3/16/19	Catcher Vessel	C	C	4.46	0.41
NPT	517	Pacific Cod	3/16/19	Catcher Vessel	C	C	4.31	0.66
<b>Totals CV BS mt &amp; rate</b>					<b>17,381</b>	<b>523,450</b>	<b>30.12</b>	<b>326.98</b>
GEAR	AI REPORTING AREA	TARGET	WEEK	SECTOR	GROUND FISH (MT)	HALIBUT (KG)	RATE KG/MT	HALIBUT MORTALITY (MT)
NPT	541	Pacific Cod	1/26/19	Catcher Vessel	C	C	15.74	0.37
NPT	541	Pacific Cod	2/2/19	Catcher Vessel	C	C	11.15	0.14
NPT	541	Pacific Cod	2/16/19	Catcher Vessel	424	810	1.91	0.48
NPT	541	Pacific Cod	2/23/19	Catcher Vessel	891	3,140	3.52	1.9
NPT	541	Pacific Cod	3/2/19	Catcher Vessel	1,032	2,860	2.77	1.73
NPT	541	Pacific Cod	3/9/19	Catcher Vessel	2,653	12,952	4.88	7.82
NPT	541	Pacific Cod	3/16/19	Catcher Vessel	1,721	3,512	2.04	2.19
NPT	542	Pacific Cod	3/9/19	Catcher Vessel	C	C	3.26	0.06
NPT	542	Pacific Cod	3/16/19	Catcher Vessel	C	C	0.00	0
<b>Totals CV AI mt &amp; rate</b>					<b>6,721</b>	<b>22,775</b>	<b>3.46</b>	<b>14.69</b>

**2. Operating in the remote western Aleutian Islands is economically challenging. These fisheries are already subject to significant restrictions including Steller Sea Lion closures, bycatch limits, gear-specific caps and trip limits.**

To illustrate the extent of current restrictions, from the Staff Comments (*emphasis added*):

*“In total, state waters of the Aleutian Islands District west of long 170°W encompasses approximately 6,966 square miles although not all state waters are open to trawl fishing due to Steller sea lion (SSL) no fishing zones and habitat protection areas. Within the proposed state waters closures area, 391 square miles (6%) is open to fishing for Atka mackerel with nonpelagic trawl gear, 1,537 square miles (22%) is open to fishing for Pacific cod with nonpelagic trawl gear, 2,277 square miles (33%) is open to fishing for non-SSL prey species (species other than walleye pollock/Atka mackerel/Pacific cod) with nonpelagic trawl gear, and 2,650 square miles (38%) is open to fishing for walleye pollock with pelagic trawl gear (Table 11-4, Figures 11-3, 11-4, 11-5, and 11-6). Closing state waters west of long 170°W to trawl gear would translate to a 100% reduction in available fishing area for the state-waters and parallel trawl fisheries. **Current parallel groundfish trawl effort and catch would redistribute to adjacent federal waters.**”*

As we illustrated in the previous section, pushing the trawl fleet into adjacent federal waters will exacerbate the Pacific halibut bycatch without a demonstrable benefit to the Golden King crab fishery.

**3. The western Aleutian Islands groundfish trawl fisheries are subject to complex, overlapping regulations. There are three harvest regimes: the federal fishery, the parallel fishery and the state waters fishery.**

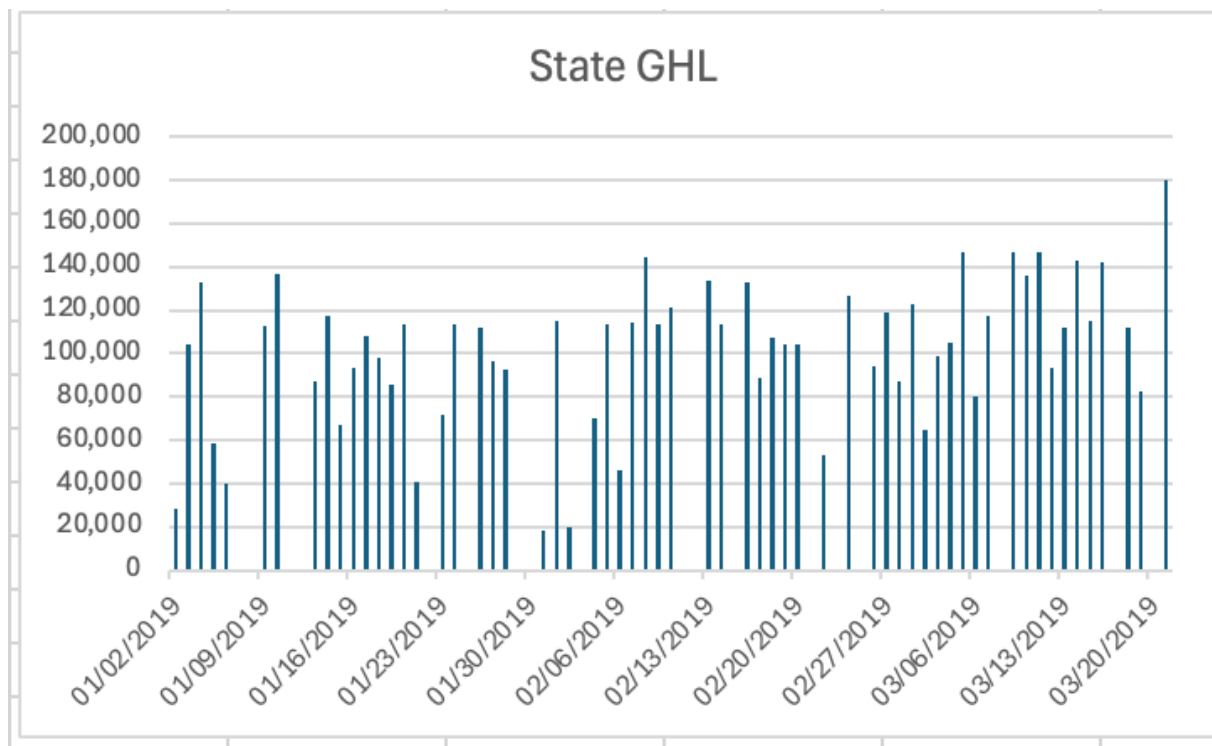
To quote from Staff Comments (*emphasis added*):

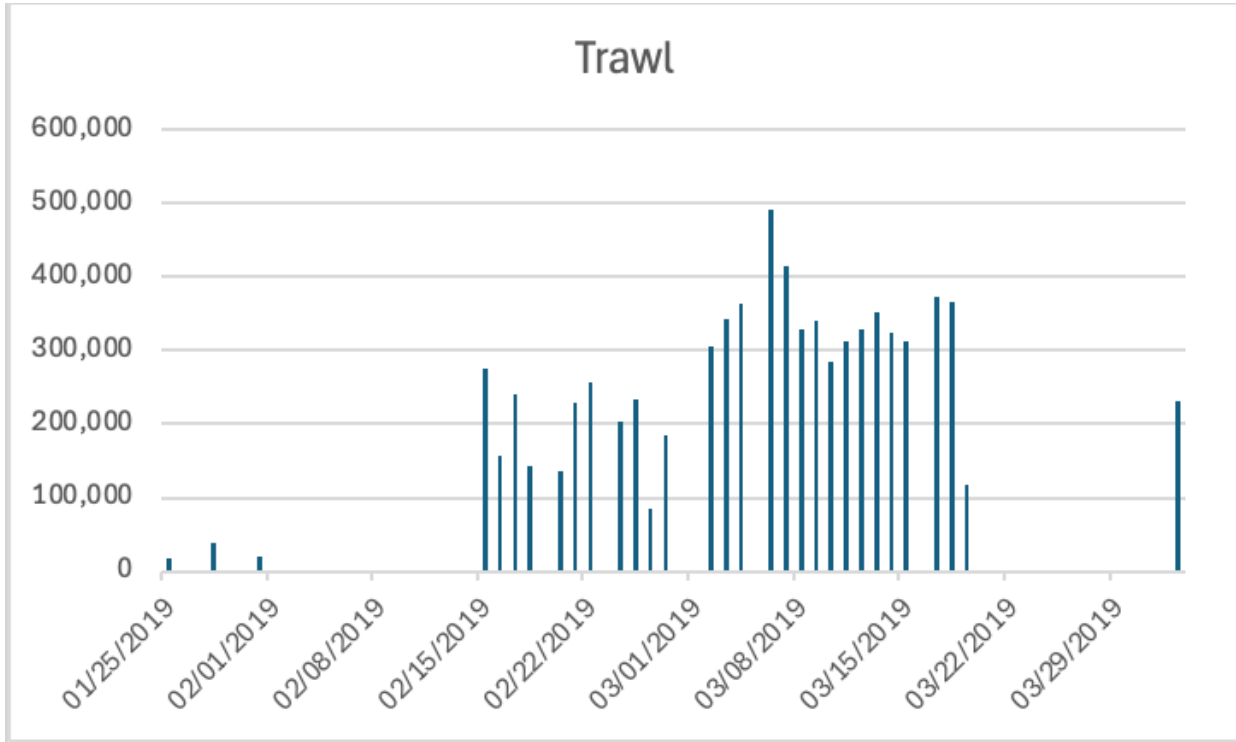
“Given past efforts to provide for uniformity across federal/parallel fisheries, establishing unique monitoring and bycatch performance standards at the state/federal boundary would create inefficiencies and present management and compliance challenges for enforcement.”

It is clear that the Board of Fish has the authority to create unique monitoring and bycatch regulations. The question that needs to be answered is this: **do the documentable benefits of Proposal 11 exceed the management, enforcement and industry costs? We do not think that has been proven.**

**4. The Pacific cod fishery in the western Aleutian Islands must be prosecuted in a very narrow time frame (while fish are aggregating); and the trawl-sector plays an important role in prosecuting this fishery efficiently and economically during the peak period.**

It is very expensive to operate in the remote Aleutian Islands. To fully prosecute the Pacific cod fishery, trawl vessels play an important role for about five weeks each year (approximately February 15 - March 20). Without the capacity provided by these vessels, prosecuting these fisheries may be at risk:





**5. Proposal 11 has been submitted by a single vessel participating in the Golden King crab fishery.**

There are more than 40 stakeholders, including ACDC, that are either opposed to Proposal 11 or remain silent. It is our understanding that several of these (other) stakeholders are also actively working with the trawl sector to avoid gear conflicts and address other areas of mutual concern.

**We believe the five rationale points outlined in this letter sufficiently communicate our significant opposition and are appropriate points of justification to oppose Proposal 11. Furthermore, we believe that should the Board of Fisheries be truly interested in additional analysis in this matter it should be sent to the Joint Protocol Committee.**

Sincerely,

Layton J. Lockett  
President

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Mike Adams, and I am a community member and commercial fisherman in the Cordova area, Area E. I fish aboard the F/V Redpack.

I fear these proposals will cause severe loss of income not just to fishermen but also to the City of Cordova in the form of fish tax. Our entire lifestyle is under threat. We are already experiencing financial stress, and I believe we need to increase silver salmon egg take and take a more diverse approach to sockeye egg take, not less.

If these proposals move forward, I believe the ripple effects will be severe: bills not getting paid, bankruptcy, divorce, and a community that slowly dissolves. We are asked to diversify, but instability like this makes me unwilling to reinvest.

We also have predators like sea lions and whales, and I believe we have a responsibility to maintain a healthy fleet, because fishermen are shareholders of our economic environment. If they don't understand this connection they should be removed.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.



Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Mike Adams  
Cordova area e, Alaska





3909 Arctic Boulevard, Suite 500  
Anchorage, Alaska 99503  
Office: (907) 222-9500  
Fax: (907) 222-9501

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

**RE: Letter of Opposition to Proposals 170, 171, and 172 – Statewide Hatchery Restrictions**

Dear Members of the Board:

Afognak Native Corporation (ANC) respectfully submits this letter in opposition to Proposals 170, 171, and 172. Consistent with ANC's adopted 2026 Legislative & Advocacy Strategy, which supports Alaska's private nonprofit (PNP) salmon hatchery program and science-based fisheries management, ANC supports maintaining the existing PNP hatchery framework and regulatory structure that has guided it for decades.

Hatcheries play a key role in sustaining subsistence, commercial, sport, and personal use fisheries across Alaska. In coastal communities, including those within ANC's region, hatchery production supports food security, cultural practice, jobs, local businesses, municipal revenues, and harbor infrastructure. Stable and predictable salmon returns are foundational to long-term planning for fishing families, processors, and communities that depend on seasonal economic activity. For many communities, hatchery-supported fisheries are deeply integrated into long-term business planning, workforce stability, and municipal budgeting. Sudden statewide reductions would create uncertainty that extends beyond harvest levels and into broader regional economic health.

Proposals 170, 171, and 172 would impose statewide egg take reductions, broad production constraints, and additional regulatory barriers without clear scientific justification or region-specific analysis. Alaska's PNP hatchery program operates under a permit-based, adaptive management system administered by the Alaska Department of Fish and Game, with established biological review, monitoring, and performance evaluation requirements. This structure allows for region-specific oversight and data-driven adjustments when warranted. Statewide mandates that do not distinguish between regions, species, or performance history risk disrupting a system designed to respond to biological conditions in real time. Blanket restrictions and added regulatory layers would undermine that framework, limit adaptive management tools, and risk reduced harvest opportunity and economic stability in fishing communities.

Alaska's fisheries management system has long been recognized for its science-based approach and regional flexibility. Maintaining that integrity is critical to ensuring balanced conservation and economic sustainability.

ANC respectfully urges the Board to reject Proposals 170, 171, and 172 and to maintain Alaska's established, science-based PNP hatchery management system.

Please contact me with questions about this letter of support at (907) 222-9587 or [malia@afognak.com](mailto:malia@afognak.com).

Sincerely,

A handwritten signature in black ink that reads "Malia Villegas".

Dr. Malia Villegas  
Senior Vice President of Community Investments  
Afognak Native Corporation



## Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588      www.ahtnatribal.org  
Phone: (907) 822-4466      Fax: (907) 822-4406      connect@ahtnatribal.org

**February 25, 2026**

Alaska Department of Fish and Game  
Boards Support Section  
1255 W. 8th Street  
Juneau, AK 99811-5526

**Dear Board of Fisheries Council Members,**

On behalf of the Ahtna Intertribal Resource Commission (AITRC), thank you for the opportunity to submit comments on the proposed regulatory changes for the 2026-2028 Statewide Finfish Proposals. AITRC represents the eight federally recognized Tribes in the Ahtna Territory, working in partnership to protect and strengthen the Ahtna People's continued customary and traditional use of fisheries and natural resources across its territory.

The enclosed comments reflect the unified input of AITRC's member Tribes, professional staff, and our Fisheries and Wildlife Committee. These positions are grounded in generations of Indigenous knowledge and lived experience managing and relying upon species such as the Copper River Salmon. The proposals we support, and the friendly amendments we recommend, aim to ensure subsistence resources remain accessible, sustainable, and managed in ways that reflect the priorities of the Indigenous communities who depend on them.

We appreciate the Board's continued engagement with Tribal voices and hope these comments assist in your deliberations. Thank you for your service and for considering the perspectives of AITRC and the Ahtna People.

Tsin'aen,

*Karen Linnell*  
Karen Linnell,

Executive Director, AITRC

## **2026 Statewide Board of Fish - Comments on Proposals**

### **Proposal 162**

AITRC submitted and continues to support Proposal 162. Alaska law defines subsistence uses as customary and traditional non-commercial uses (AS 16.05.940(7) and (34)). In times of low abundance, specifically for Chinook salmon available to subsistence fisheries statewide, it is best to use precautionary management. Allowing commercial transport of fishermen in subsistence fisheries is contrary to AS 16.05.940(7) and (34).

These statutes state that (7) “customary and traditional” means the noncommercial, long-term, and consistent taking of, use of, and reliance upon fish or game in a specific area and the use patterns of that fish or game that have been established over a reasonable period of time taking into consideration the availability of the fish or game; and (34) “subsistence uses” means the noncommercial, customary and traditional uses of wild, renewable resources by a resident domiciled in a rural area of the state for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles out of nonedible by-products of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption; in this paragraph, “family” means persons related by blood, marriage, or adoption, and a person living in the household on a permanent basis;

The newly established pattern of the commercial use of boats for subsistence salmon fishing should be prohibited under a subsistence permit. We need to protect the intended use of subsistence resources, not extract from salmon populations for commercial interests.

### **Proposals 163-165**

We strongly support proposals 163, 164, & 165, as the impact of the trawl fisheries are detrimental to the longevity of populations which rely on healthy ocean habitats. It is clear, as we have seen examples around the country where trawling has been outlawed, that trawl negatively impacts fish and other populations. There is clear evidence that stopping trawling results in rebounded populations. As we can all see the destruction of ocean floor habitat caused by trawling, these proposals are simply common sense.

### **Proposals 170-172**

We support proposal 170 and take no action on 171 and 172. The board of fish hatchery committee has been tasked with oversight of hatchery production based on science. There is new scientific evidence that demonstrates competition with wild stocks is detrimental. One example of many is declining growth rates of wild sockeye during high abundance biennial pink salmon years (Rand & Ruggerone 2024).

**Proposal 175**

We support proposal 175 with a clarifying amendment of using the frame must be attached to a single rigid handle and be operated by hand “without the addition of a rope attached to the handle and boat *specifically for the purpose of extending* [to extend] the reach of the dip net into the water beyond the length of the rigid handle.” We do not intend for this proposal to limit the current uses of a rope tied to the handle of the net to alleviate resistance, potential loss of net, or safety of the dipnetter, rather to prevent “dipnetting” being conducted in a manner similar to the following YouTube link of “dipnetting” on the lower Yukon:

<https://www.youtube.com/watch?v=g6MjcnYXyTw> This is not dipnetting. It more closely relates to trawling or gillnetting.

We continue to support decreasing the maximum dipnet mesh size from 4.5 to 3.5-inch mesh. After conversations with commercial dipnet guides and personal dipnetters, it became apparent they were in agreement that it is easier to release large Chinook salmon unharmed from a dipnet with 3.5-inch mesh versus 4.5-inch mesh. Both of these mesh sizes are widely available. In times of low Chinook salmon abundance statewide it is important to take measures that reduce stress and incidental mortality.

**Proposals 179-180**

We strongly support proposals 179 and 180. We favor proposal 180 as it prevents the most exploitation of Chinook salmon in this current era of statewide low abundance.

**Proposal 181**

While we understand the intent of this proposal, we are concerned it may restrict the use of tip-ups while ice-fishing. It may make more sense to include “radio-controlled boat, drone, or downrigger” in prohibited gear for sport fishing, or to use clarifying language to not prohibit commonly used methods including tip-ups.

**Proposal 182**

We oppose this proposal. This proposal could benefit by amending to limit to invasive species only.

**Proposal 183**

We oppose this proposal. It does not make sense to not take care of your harvest as immediately as possible. If this proposal were to pass, many fishermen with good intentions of taking care of their meat would inadvertently be breaking the law. This may be useful biologically or for enforcement on a species or regional basis, but not for all finfish. As written, this proposal does not make sense.



February 26, 2026

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526

**RE: Opposition to Proposal 186 – Upper Cook Inlet Drift Gillnet Restrictions**

Madam Chair and Members of the Board,

Alaska Boats & Permits, Inc. opposes Proposal 186, which would permanently reduce drift gillnet fishing opportunity in Area 1 during mid-July and eliminate it altogether during the latter half of July.

Alaska Boats & Permits, Inc. is Alaska's largest marine brokerage. Since 1997, we have worked with commercial fishermen in every major fishery in the state. As President and owner of the company, a member of a fishing family, and a resident of a coastal community, I regularly attend Board of Fisheries (BOF) and North Pacific Fisheries Management Council (NPFMC) meetings. The regulatory decisions made by this Board directly affect our business, the thousands of Alaska fishermen we serve, and our community of Homer, located at the heart of the Cook Inlet drift fishery.

**Proposal 186 should not have been accepted as an out-of-cycle Agenda Change Request (ACR), and it should be rejected on that basis alone.** Although framed as a conservation proposal, it is not predicated on an emergent conservation circumstance. Rather, it asks the Board to permanently reallocate fishing opportunity among user groups by imposing rigid restrictions on drift gillnet fishing in Area 1, regardless of coho run strength or biological conditions.

**Failure to Meet ACR Standard; Absence of Conservation Basis**

ACRs exist to address unforeseen conservation or biological issues that arise outside the regular cycle and require prompt Board action. Proposal 186 identifies no stock-of-concern designation, no biological threshold, and no emergent risk that existing management tools are incapable of addressing.

Under Alaska law and longstanding Board practice, the distinction between conservation and allocation is fundamental. Conservation measures are those necessary to maintain sustained yield. Allocation decisions determine how harvest opportunity is divided among users once conservation needs are met.

Despite being justified on purported concerns about coho salmon, **Proposal 186 is inherently allocative.** It does not meaningfully address coho run size, escapement performance, or stock status. It identifies no conservation objective and provides no explanation for how the proposed restrictions would achieve one.

If Proposal 186 were genuinely conservation-based, it would be tied to measurable biological performance and structured to adjust as conditions change. It is not. A regulation that applies identically in weak years and strong years is not conservation-driven; it is allocation by design.

Effective conservation management under Alaska's sustained-yield mandate is adaptive. It relies on in-season information and allows managers to respond to real-time conditions. Proposal 186 removes that flexibility entirely. It provides no in-season management authority and no mechanism to tether restrictions to abundance.

**Alaska Boats & Permits, Inc.**

Such rigidity is inconsistent with conservation management and further underscores the allocative nature of the proposal.

Allocative proposals belong in the regular cycle, where competing interests can be evaluated transparently and in context. Accepting Proposal 186 as an ACR circumvents that process and undermines the open, stakeholder-driven framework that has long defined Alaska’s fishery management system.

**Conflict with Coordinated Management; Cumulative Effects**

At its February meeting, the NPFMC set a Cook Inlet EEZ coho total allowable catch (TAC) of **16,619 fish**, reflecting a highly precautionary federal management approach. The Council made clear that this precaution was driven not by a documented conservation concern, but by limitations in available data and federal management structure under the Magnuson–Stevens Act.

Proposal 186 would layer severe and permanent State-water restrictions on top of this already constrained federal framework without consideration of cumulative effects or foreseeable effort displacement. The predictable result is increased management instability, concentration of effort, and early closures driven by regulatory interaction rather than biological necessity.

Sound salmon management in Cook Inlet depends on coordination and predictability. Proposal 186 undermines both.

**Economic and Community Impacts**

Drift gillnet fisheries support Alaska residents, family businesses, processors, and coastal communities throughout Cook Inlet. Permanent restrictions untethered to biological performance unreasonably limit economic opportunity and disproportionately burden these coastal communities without demonstrating a conservation benefit. Such outcomes are not required to maintain sustained yield and should not be imposed through an out-of-cycle process.

**Conclusion**

**Alaska Boats & Permits, Inc. respectfully requests that the Board reject Proposal 186 or, at a minimum, decline to act on it outside the regular cycle and defer consideration to the March 2027 Upper Cook Inlet meeting, consistent with the Board’s established standards for allocative proposals.**

Proposal 186 is not necessary for conservation, is not responsive to biological conditions, and represents a permanent and allocative regulatory change improperly advanced through the ACR process. Acting on it out of cycle would require the Board to make permanent allocation decisions without the procedural safeguards of the regular cycle and without a demonstrated conservation necessity.

Thank you for the opportunity to comment, for your careful consideration, and for your continued prioritization of open and transparent fisheries management.

Respectfully,



**Maddie Lightsey, President**

**Alaska Boats & Permits, inc.**

**Submitted by:** Jim Erickson  
Alaska Glacier Seafoods, Inc.  
**Community of Residence:** Juneau

March 1, 2026

Alaska Board of Fish

March 2026 Statewide Meeting

Submitted By: Jim Erickson

Chairman Carlson-Van Dort and Board Members

Alaska Glacier Seafoods is a processing company located in Juneau Alaska. As a family-owned local processing company, we oppose Proposal 170.

My company is celebrating its 30th year in business in 2026. My company along with the more than 70 boats that fish salmon for us have become deeply dependant on hatchery produced Chum, pink and coho.

The loss of of this hatchery production will no doubt have a strong negative effect on all of our bottom-line annually.

Less hatchery production will result in fewer seafood jobs, reduced payment on fish tickets to the boats, reduced tender contracts, less fish tax revenue (both for the state and the community in which the fish is landed in) , less fuel sales and overall reduced economics for all the indirect businesses that rely on a robust salmon season.

The economic benefits of hatchery produced salmon have far reaching positive economic impacts for all involved.

Hatchery produced salmon in SE Alaska provides a strong platform for my company and it makes up a large percentage of the salmon that we process on a annual basis. The loss of this salmon production would undoubtedly affect on how we operate with other species as well during the salmon season. In short...reduced hatchery produced salom would cause us to have to change how we operate overall.

Our industry has been through some extremely challenging seasons in recent years and I feel that we are now on a slow road to economic recovery. I ask you as a life-long Alaskan and local business owner who lives year-round in Juneau to Vote Down Proposal 170.

The last thing our industry needs right now is more uncertainty.

Respectfully,

Jim Erickson

Vice-President

Alaska Glacier Seafoods, Inc

Juneau AK

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March 2, 2026

Chair and Board Members,

The Alaska Healthy Habitat Alliance respectfully submits this comment letter in strong support of Proposals 163, 164, and 165. These proposals advance a straightforward and essential principle for Alaska fisheries management: when the State defines a gear type and sets operating standards, those standards must be clear, enforceable, and verifiable on the water. This is particularly important for fisheries with large operational footprints and the potential for substantial habitat and bycatch impacts, such as Alaska’s pelagic trawl fisheries.

**Alaska already has the policy direction in place.** State regulations define pelagic trawl gear as gear used in state waters that does not operate in contact with the seabed. The problem is not that Alaska lacks a definition. The problem is that Alaska currently lacks a workable compliance pathway that allows the Alaska Department of Fish and Game and enforcement to verify that pelagic trawl gear is in compliance while fishing is underway. In the absence of verification, the management system defaults to “trust us” compliance. That outcome is incompatible with accountable fisheries management and leads to predictable consequences: enforcement paralysis, erosion of regulatory credibility, increased user conflict, and elevated risk to benthic habitat and non-target species, including salmon.

### **Requested Board action**

For these reasons, the Alaska Healthy Habitat Alliance respectfully urges the Alaska Board of Fisheries to adopt Proposals 163, 164, and 165 as a cohesive package that:

1. Convert the definition of pelagic trawl gear from a paper standard into an enforceable operating standard
2. Establish a verifiable compliance pathway for fishermen and enforcement through monitoring and clear protocols
3. Require salmon excluders as a baseline best practice to reduce avoidable salmon bycatch
4. Improve fairness across gear types by reducing gray areas and ensuring consistent accountability
5. Restore public confidence by replacing “trust us” with proof

Evidence developed through the North Pacific Fishery Management Council process makes clear that so-called “pelagic” trawl gear frequently contacts the seafloor. The Council’s Fishing Effects (FE) Model incorporates observer data, vessel behavior, and gear characteristics and concludes that pelagic trawl nets, doors, and sweeps make regular bottom contact across large portions of their footprint. This conclusion has been reinforced by testimony from trawl fleet representatives at multiple NPFMC meetings acknowledging that bottom contact is a routine and, at times, unavoidable aspect of pelagic trawl operations. In other words, both modeling and industry testimony confirm that pelagic trawl gear does not operate off-bottom as defined in Alaska regulation. This record leaves little ambiguity: bottom contact is not hypothetical, incidental, or rare. It is a known and documented feature of the fishery. Alaska’s challenge is not a lack of information, but a lack of enforceable mechanisms in state waters to verify compliance with the “no bottom contact” standard while fishing is occurring.

Proposals 163 and 164 directly address this core problem by establishing a practical, enforceable framework to confirm whether pelagic trawl gear is operating as defined in state regulations. Proposal 165 strengthens Alaska’s approach to salmon stewardship by requiring salmon excluders as a baseline best practice for reducing avoidable salmon bycatch risk in state waters.

**Proposal 163: Support for a “prove pelagic operation” framework**

Proposal 163 would treat pelagic trawl gear as bottom-contact gear unless operators can demonstrate, through enforceable verification methods, that the gear is not fishing on the seafloor. We support this approach because it aligns with Alaska’s fundamental accountability standards in commercial fisheries: permit holders are responsible for the legal operation of their vessels at all times. Where a gear definition rests on how the gear is fished, rather than solely on its design, it is reasonable and necessary to require that compliance be demonstrable.

This proposal also strengthens fairness across gear types. Many Alaska fishermen operate under strict constraints and clear enforcement standards and are expected to maintain compliance at all times. Allowing pelagic trawl to operate in a gray zone due to a lack of verification creates an uneven playing field and undermines confidence in the regulatory system as a whole. A presumption framework is a practical tool to move management away from argument and toward evidence. It reduces conflict by substituting measurable proof for competing narratives, and it protects compliant operators by allowing them to document and demonstrate their off-bottom operations.

We are open to practical ideas from the fleet and technical experts on what constitutes “proof,” provided the approach is enforceable and verifiable. Alaska must move past “just trust us.” A system that depends on trust alone is not management.

**Proposal 164: Support for seafloor monitoring to make the definition enforceable**

Proposal 164 would require seafloor monitoring technology on pelagic trawl gear to verify compliance with state regulations. This proposal is essential because it provides what the current regulatory system lacks: a practical verification method that makes the existing pelagic definition enforceable.

The objective should be to establish a reliable method to verify when the gear is in contact with the seabed, supported by a clear protocol for verification and compliance documentation. Monitoring is not about punishment. It is about measurable compliance. It is also a conflict-reduction tool. When compliance is transparent and verifiable, disputes decrease, credibility improves, and compliant operators benefit from documented proof rather than operating under suspicion.

The Board can further strengthen this proposal's effectiveness by emphasizing key implementation principles: a clear standard for what constitutes seabed contact or avoidance during fishing operations; transparent, auditable compliance protocols with appropriate confidentiality protections; an implementation ramp that leads to enforceability on a defined schedule; and predictable consequences for noncompliance. Monitoring requirements without meaningful consequences risk becoming another unenforceable rule, and Alaska cannot afford additional gray areas in high-impact fisheries.

### **Proposal 165: Support for salmon excluders as a baseline best practice**

Proposal 165 would require the use of salmon excluders in pelagic trawl nets. We support this proposal as a common-sense bycatch reduction measure and an appropriate baseline best practice in mixed-stock waters, as evidenced in the Experimental Fishing Permit work in the Gulf of Alaska in 2013-2014. Salmon are a statewide resource with profound cultural, economic, and food-security significance. Where avoidable salmon encounters occur in pelagic trawl fisheries, Alaska should require the use of proven mitigation tools to reduce risk and support salmon stewardship.

Proposal 165 also advances consistency across jurisdictions. When best practices exist in one jurisdiction but remain optional in another, the result is regulatory fragmentation, confusing expectations, and uneven conservation outcomes. Aligning expectations for state waters with modern bycatch mitigation standards used in the adjacent federal fishery strengthens public trust and the credibility of Alaska's fisheries management system.

### **Addressing predictable concerns**

We recognize that some will argue that the pelagic trawl fleet already fishes off the bottom, or that monitoring and excluders will be costly. If operators are already fishing off the bottom, then verification should be straightforward and beneficial. A compliance system would document what operators say they are already doing, reduce public controversy, and decrease user conflict. This is about ensuring the "no bottom contact" definition is enforceable and trusted.

Cost is a legitimate implementation consideration, but it is not a reason to preserve an unenforceable rule for a fishery with potentially large impacts. The Board can adopt these proposals while encouraging timelines for collaborative protocol development with the fleet and technical experts, performance-based standards that avoid vendor lock-in, and the pursuit of grant and congressional support where appropriate. The costs of inaction are also real: ongoing conflict, loss of management credibility, and continued habitat and bycatch risks under an unverifiable system.

Thank you for your service and for the opportunity to comment. We appreciate the Board's commitment to clear, enforceable regulations that protect Alaska's habitats and the communities that depend on healthy fisheries.

Respectfully submitted,

Alaska Healthy Habitat Alliance



March 2, 2026

Dear Chair Carlson- Van Dort and Alaska Board of Fisheries members:

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

- Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.
- Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.
- Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

Sincerely,

- |                                    |                                   |                                       |                                   |
|------------------------------------|-----------------------------------|---------------------------------------|-----------------------------------|
| 1. Mj Litchard Nome, AK            | 2. Debbie Nome, AK                | 3. Mark Weissler Anchorage, AK        | 4. Cece Jefferson Anchorage, AK   |
| 5. Chris Walker Valdez, AK         | 6. Jody Arnold Anchorage, AK      | 7. Jeremy Williams Seward, AK         | 8. Bobette Jenkins Anchorage, AK  |
| 9. Mike Wann Anchorage, AK         | 10. Cody Mcdonald Anchorage, AK   | 11. Martaelena Mcnatt Eagle River, AK | 12. Dave Mendez Eagle River, AK   |
| 13. Dave Oaks Anchorage, AK        | 14. Kimberly Oaks Anchorage, AK   | 15. Nellie Huffman Anchorage, AK      | 16. Arthur Jones Anchorage, AK    |
| 17. Matt Carr Wasilla, AK          | 18. Susan Lambrix Indian, AK      | 19. John Ford Indian, AK              | 20. Isaac Rush Wasilla, AK        |
| 21. Mike Day Eagle River, AK       | 22. Jeff Kusz Anchorage, AK       | 23. Bobby Carter Palmer, AK           | 24. Curt Martin Palmer, AK        |
| 25. Derek Samuelson Anchorage, AK  | 26. Lisa Jackson Anchorage, AK    | 27. Michael Bevis Anchorage, AK       | 28. Libby Musolino Fairbanks, AK  |
| 29. Michael Saxby Anchorage, AK    | 30. Judy Reed Nome, AK            | 31. Ayse Macknight Kodiak, AK         | 32. William Beaver Fairbanks, AK  |
| 33. Roberta Greenlee Fairbanks, AK | 34. Clifford Williams Yakutat, AK | 35. Mary Porter Yakutat, AK           | 36. Zoe Bulard Yakutat, AK        |
| 37. Reyna Abreu-Vigil Yakutat, AK  | 38. Jeremiah James Yakutat, AK    | 39. Raymond Brady Eagle River, AK     | 40. Betty Mcintos Valdez, AK      |
| 41. Kimberly Baridiana Valdez, AK  | 42. Renae Egrass Valdez, AK       | 43. Isabella Tulauskas Valdez, AK     | 44. Emily Iacobucci Anchorage, AK |
| 45. Erica Schurosky Wasilla, AK    | 46. Randi Gryting Talkeetna, AK   | 47. Nate Baird Girdwood, AK           | 48. Gloria Roe Girdwood, AK       |
| 49. Greg Gedemer Wasilla, AK       | 50. Frances Hunter Girdwood, AK   | 51. Nicolette Hoeg Eagle River, AK    | 52. Margaret Vos Talkeetna, AK    |
| 53. John Loomis Talkeetna, AK      | 54. Diane Okonek Talkeetna, AK    | 55. Kathy Sullivan Talkeetna, AK      | 56. Lorraine Brown Fairbanks, AK  |
| 57. Wesley Snyder Anchorage, AK    | 58. Kris Perry Talkeetna, AK      | 59. Truno Holdaway Fairbanks, AK      | 60. Kat Fyten Fairbanks, AK       |

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|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|
| 61. Krista Wilkinson<br>Fairbanks, AK | 62. Audrey Welsh<br>Fairbanks, AK     | 63. Christopher<br>Hellmann           | 64. David Athons<br>Kenai, AK         |
| 65. Terry Wilson<br>Fairbanks, AK     | 66. Joyanne Bloom<br>Juneau, AK       | 67. John Leask<br>Metlakatla, AK      | 68. John Lancaster<br>Homer, AK       |
| 69. William Hartley<br>Ketchikan, AK  | 70. Tim Ewing<br>Anchorage, AK        | 71. Max Royall<br>Coffman Cove, AK    | 72. Steve Fleischman<br>Anchorage, AK |
| 73. Carol Race<br>Juneau, AK          | 74. Linda Ayer<br>Valdez, AK          | 75. Diane Wessing<br>Anchorage, AK    | 76. Carma Johnston<br>Eagle River, AK |
| 77. Sophie Frets<br>Kodiak, AK        | 78. Jane Miles<br>Homer, AK           | 79. Tim Hinterberger<br>Anchorage, AK | 80. Wayne Pichon<br>Anchorage, AK     |
| 81. Tyler Henegan<br>Anchorage, AK    | 82. Brian Beckwith<br>Eagle River, AK | 83. Sam Mcbeen<br>Tenakee Springs, AK | 84. Chuck Donahue Jr<br>Anchorage, AK |
| 85. Diane Boggess<br>Anchorage, AK    | 86. Daphne Koropp<br>Anchorage, AK    | 87. Hunter Heafer<br>Soldotna, AK     | 88. Maddie Halloran<br>Anchorage, AK  |
| 89. Margaret Mcneil<br>Anchorage, AK  | 90. Pamela Nolcini<br>Wasilla, AK     | 91. Sara Gering<br>Anchorage, AK      | 92. Dan Busch<br>Kodiak, AK           |
| 93. Callan Chythlook-<br>Sifsof       | 94. Ineke Buchman<br>Homer, AK        | 95. Chris Reynolds<br>Anchorage, AK   | 96. Antonia Grissett<br>Anchorage, AK |
| 97. Francis Gallela<br>Anchorage, AK  | 98. Vanessa Tahbone<br>Nome, AK       | 99. Kyle Gregory<br>Anchorage, AK     | 100. Allen Dahl<br>Anchorage, AK      |
| 101. Jennifer Liepa<br>Anchorage, AK  | 102. Alexander Stock<br>Haines, AK    | 103. Maryclaire<br>Bernstein          | 104. Heidi Robichaud<br>Haines, AK    |
| 105. Bob Standish<br>Kenai, AK        | 106. Tory Rockefeller<br>Homer, AK    | 107. Christopher<br>Hashiguchi        | 108. Kate Persons<br>Nome, AK         |
| 109. Casimir<br>Abramczyk             | 110. Cindy Wagner<br>Metlakatla, AK   | 111. Mickie Burns<br>Homer, AK        | 112. Sonnet Nyback<br>Anchorage, AK   |
| 113. Alisa Carroll<br>Anchorage, AK   | 114. John Nielsen<br>Palmer, AK       | 115. Anissa Berry<br>Haines, AK       | 116. Norman Alexie<br>Anchorage, AK   |
| 117. William Ledoux<br>Wasilla, AK    | 118. Anna Aсталos<br>Anchorage, AK    | 119. Gregory Olsen<br>Soldotna, AK    | 120. Chris Clark<br>Anchorage, AK     |

121. Camille Hermon Palmer, AK	122. Dwight Kramer Kenai, AK	123. Adam Cuthriell Girdwood, AK	124. Marvin Lake Anchorage, AK
125. Mary Lukens Kodiak, AK	126. Joan Cahill Juneau, AK	127. Diane Taylor Kasilof, AK	128. Douglas Moody Anchorage, AK
129. Trevor Rollman Soldotna, AK	130. Lorne Miller Anchorage, AK	131. Whitney Wolf Talkeetna, AK	132. Laura Wright Talkeetna, AK
133. Rene Limeres Healy, AK	134. Kelly Haag Anchorage, AK	135. Gloria Simeon Bethel, AK	136. Jeremy Waite Fairbanks, AK
137. Ken Hamrick Anchorage, AK	138. William Kramer Juneau, AK	139. Ryan Martin Port Alexander, AK	140. Scott Lindquist Palmer, AK
141. Daniel Landen Juneau, AK	142. Susan Ware Anchorage, AK	143. Erik Norberg Juneau, AK	144. Katrina Leary Anchorage, AK
145. Carly Wier Homer, AK	146. Mary Jo Lord-Wild Elfin Cove, AK	147. Maureen Knutsen Naknek, AK	148. John Hudson Juneau, AK
149. Carolyn Nichols Sitka, AK	150. Hannah Heimbuch	151. Tav Ammu Dillingham, AK	152. China Kantner Kotzebue, AK
153. Bruce Markwood Anchorage, AK	154. Eli Hanlow III Yakutat, AK	155. Cynthia Adams Haines, AK	156. Nora Skeelee Sitka, AK
157. Jamison Ramsey Ketchikan, AK	158. Robert Sparks Fairbanks, AK	159. Maureen Powers Homer, AK	160. Betsy Peratrovich Anchorage, AK
161. Kevin Bopp Fairbanks, AK	162. Kevin Shaffer Moose Pass, AK	163. Kaye Holowatch Anchorage, AK	164. Fred Klouda Anchorage, AK
165. James Lyons Eagle River, AK	166. Angela Ferrari Anchorage, AK	167. Peter Melde Anchorage, AK	168. Angie Hamill Chugiak, AK
169. Katie McClellan Fairbanks, AK	170. Brian Okonek Talkeetna, AK	171. Sue Baker Chiniak, AK	172. Deborah Limacher
173. Lynnda Kahn Soldotna, AK	174. Della Coburn Anchorage, AK	175. Craig Walcott Sterling, AK	176. Sandra Loomis Talkeetna, AK
177. Susan Vogt Fairbanks, AK	178. Ken Zafren Anchorage, AK	179. Shirley Forquer Homer, AK	180. Karen Wilson Juneau, AK



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|--|-------------------------------------|--|---|
| 181. Joe Seelig<br>Anchorage, AK       | 182. Jeremy Robida<br>Valdez, AK    | 183. Dogan Ozkan<br>Fairbanks, AK      | 184. Suzette<br>Mashburn                |
| 185. Randy Busch<br>Kodiak, AK         | 186. Arthur Bloom<br>Juneau, AK     | 187. Jennifer Edwards-<br>Fahl         | 188. Stan Olsen<br>Anchorage, AK        |
| 189. Santa Claus<br>North Pole, AK     | 190. Guy Lopez<br>Big Lake, AK      | 191. Valerie Penz<br>Anchorage, AK     | 192. Todd Young<br>Anchorage, AK        |
| 193. Thea Whitehead<br>Wasilla, AK     | 194. Theodore Bartko<br>Palmer, AK  | 195. Bruce Service<br>Anchorage, AK    | 196. Becky Breeding<br>Chugiak, AK      |
| 197. Darcy Holt<br>Anchorage, AK       | 198. Theresa Dolan<br>Anchorage, AK | 199. Lisa Villano<br>Fairbanks, AK     | 200. Sally Donaldson<br>Juneau, AK      |
| 201. Daniel Norman<br>Kenai, AK        | 202. Edward San<br>Martin           | 203. Susan Oehlers<br>Yakutat, AK      | 204. Steve Fish<br>Sitka, AK            |
| 205. Mary Ann Tierese<br>Anchorage, AK | 206. Karen Mannix<br>Talkeetna, AK  | 207. Donna Willoya<br>Wasilla, AK      | 208. Andres Camacho<br>Douglas, AK      |
| 209. Germaine<br>Thomas                | 210. Deborah<br>Anderson            | 211. Bruce White<br>Sitka, AK          | 212. Richard Rothstein<br>Anchorage, AK |
| 213. Betty Bonin<br>Naknek, AK         | 214. Samuel Ohana<br>Anchorage, AK  | 215. Jamie Bailey<br>Anchorage, AK     | 216. Paula Williams<br>Anchorage, AK    |
| 217. Rachel Robison<br>Talkeetna, AK   | 218. Dan Berube<br>Anchorage, AK    | 219. Martha Service<br>Anchorage, AK   | 220. Jan Conitz<br>Juneau, AK           |
| 221. Dawn Morse<br>Anchorage, AK       | 222. Abigail<br>Leatherman          | 223. Erica Madison<br>King Salmon, AK  | 224. Laura Deatherage<br>Valdez, AK     |
| 225. Sue Christiansen<br>Homer, AK     | 226. Evelyn Agnus-<br>Leavitt       | 227. Mary Martin<br>Juneau, AK         | 228. Nancy Waterman<br>Juneau, AK       |
| 229. Courtney Moore<br>Anchorage, AK   | 230. Cathy Bremner<br>Yakutat, AK   | 231. Theresa<br>Gerdtsen               | 232. Lori Stephenson<br>Homer, AK       |
| 233. Katherine Boyle-<br>Schmidt       | 234. Tom Vandewater<br>Juneau, AK   | 235. Phil Shoemaker<br>King Salmon, AK | 236. Nelson Co<br>Homer, AK             |
| 237. James Goodwin<br>Soldotna, AK     | 238. Amber Bridgeman<br>Wasilla, AK | 239. Trevor Ose<br>North Pole, AK      | 240. Brenan Hornseth<br>Seward, AK      |

241. Julie Nolan Homer, AK	242. Marc Dumas Fairbanks, AK	243. Robert Gardiner Ketchikan, AK	244. Thomas Finger Kenai, AK
245. Aidan Shafland Valdez, AK	246. Kneeland Taylor Anchorage, AK	247. Hayden Kaden Gustavus, AK	248. Lynette Hinz Anchorage, AK
249. Noelle Carbone Talkeetna, AK	250. Emily Craver Anchorage, AK	251. James Simon Fairbanks, AK	252. Luke Hopkins Fairbanks, AK
253. Colleen Bickford Anchorage, AK	254. Steve Box Juneau, AK	255. Jean Carter Palmer, AK	256. Neil Akana Sitka, AK
257. Lorraine Nolley Anchorage, AK	258. Daniel Smith Wrangell, AK	259. Richard Catrett Juneau, AK	260. Vladimir Kuzmin Delta Junction, AK
261. John Gardner III Sand Point, AK	262. Timothy Sexton Douglas, AK	263. Minnie Chase Bethel, AK	264. Michael Hansen Kodiak, AK
265. Brad Swanson Yakutat, AK	266. Michael Schmit Ketchikan, AK	267. Lindsay Johnson Haines, AK	268. Gary Rozelle Sr. Akhiok, AK
269. Curt Rudd Anchorage, AK	270. Mark Niver Wasilla, AK	271. Pamela Weaver Fairbanks, AK	272. Kate Crump King Salmon, AK
273. Corinna Dart Manley Hot Springs,	274. Norman Hoppas Anchorage, AK	275. Olivia Spiezio Anchorage, AK	276. April Woods Anchorage, AK
277. Piper Hartues Anchorage, AK	278. Carl Berlin Kasigluk, AK	279. Dennis Northrup Ketchikan, AK	280. Diane Jewkes North Pole, AK
281. Dan Anderson Valdez, AK	282. Nathan Elswick Anvik, AK	283. Rob Boyer Anchorage, AK	284. Amanda Johnson Anchorage, AK
285. Jason Bontrager Anchorage, AK	286. Sara Thomas Anchorage, AK	287. Christine Everett North Pole, AK	288. Freya Tagseth Seward, AK
289. Blake Bousley Ketchikan, AK	290. Brian Ross Juneau, AK	291. Anne Kahn Homer, AK	292. Barbara Norris Anchorage, AK
293. Phillip Sparrow Wasilla, AK	294. Jerome Mcarthur Anchorage, AK	295. Lee Page Ninilchik, AK	296. Bruce Baker Juneau, AK
297. Kendra Blochwitz Anchorage, AK	298. Kim Smith Homer, AK	299. Joel Jackson Kake, AK	300. Dyan Ecklund Anchorage, AK

301. David Vought II Soldotna, AK	302. Samuel Roberts Juneau, AK	303. Yvette Wilkins Eagle River, AK	304. Les Dunbar Palmer, AK
305. Warren Schaefer Anchorage, AK	306. Marika Hintz Palmer, AK	307. Crystal Howard Wasilla, AK	308. Caryn Fuzzard Fairbanks, AK
309. Michael Janecek Palmer, AK	310. Steve Mcelfresh Ninilchik, AK	311. Kathy Budd Palmer, AK	312. Jimmie Jack Drath Soldotna, AK
313. Mary Jane Wiehl Rampart, AK	314. Richard Hiratsuka Dillingham, AK	315. Carol Wegener Petersburg, AK	316. Seth Stewart Pelican, AK
317. Joan Mcbeen Tenakee Springs, AK	318. Ryan Astalos Anchorage, AK	319. Sue Lillard Wasilla, AK	320. Beth Fenhaus Haines, AK
321. Karl Ashenbrenner Jr	322. Matthew Boldt Anchorage, AK	323. Nathaniel Moulton	324. Clyde Vicary Anchorage, AK
325. Charles Mccrone Kasilof, AK	326. Claudia Jacobson Soldotna, AK	327. Patricia Stark Fairbanks, AK	328. Christine St Pierre Fairbanks, AK
329. Shonna Roush Juneau, AK	330. Patrick Quigley Craig, AK	331. Elizabeth Wolfe Haines, AK	332. Jake Richey Anchorage, AK
333. Elizabeth Martin Ketchikan, AK	334. Todd Russell Kenai, AK	335. Lauren Attanas Fairbanks, AK	336. Morris Nassuk Koyuk, AK
337. Rett Gunnell Homer, AK	338. Karen Haley Sitka, AK	339. Bradford Buddenberg	340. Laurie Daniel Homer, AK
341. Laurie Thorpe Wasilla, AK	342. Shawn Silverthorn	343. Susanne Miller Anchorage, AK	344. Keith Westphal Wasilla, AK
345. Gordon Edmiston Chugiak, AK	346. David Apperson Anchorage, AK	347. Laura Derungs Talkeetna, AK	348. Robert Geesen Kenai, AK
349. Rick Dominguez Sr	350. Kayci Hanson Ninilchik, AK	351. Clare Hanneman Fairbanks, AK	352. Andrea Burtzel Anchorage, AK
353. Jeff Knisley Anchorage, AK	354. Parker Lowney Homer, AK	355. Christopher Barton	356. Willow Alvarez Anchorage, AK
357. Michael Dyer Anchorage, AK	358. Ryan Byrne Anchorage, AK	359. Yasmin Radbod Anchorage, AK	360. Camilla Beans Anchorage, AK

361. Jennifer Sonneborn	362. Halen Hernandez Homer, AK	363. Elizabeth Bassett Anchorage, AK	364. Morgan Vail Anchorage, AK
365. Patrick Dolphin Kenai, AK	366. Craig Saunders Skwentna, AK	367. William Clock Seward, AK	368. Michael Metcalf Anchorage, AK
369. Seth Gray Kenai, AK	370. Theresa Clark Anchorage, AK	371. Eric Morales Sitka, AK	372. Karma Ulvi Eagle, AK
373. Janet Crichton Juneau, AK	374. Mark Jacobson Soldotna, AK	375. Shannon Tibbs Ketchikan, AK	376. Kevin Miller Juneau, AK
377. Robert Fuller Anchorage, AK	378. Eric Wallis Eagle River, AK	379. Joel Bouse Jr Willow, AK	380. Larry Kelone Valdez, AK
381. Laura Deatherage Valdez, AK	382. Mary Ostermick Talkeetna, AK	383. Michael Diemer Anchorage, AK	384. Robin James Valdez, AK
385. Scott Van Valin Craig, AK	386. Kristine Harder Haines, AK	387. Chris Lillehoff Sitka, AK	388. David Fitka Marshall, AK
389. Dan Kosterman Eagle River, AK	390. Lucas Gogert Palmer, AK	391. Storman Norman Anchorage, AK	392. Chuck Hugny Nenana, AK
393. David Plant Palmer, AK	394. Lesley Hammer Anchorage, AK	395. Melis Coady Talkeetna, AK	396. Michael Pendergast
397. Bradley Cruz Anchorage, AK	398. Craig Johnston Eagle River, AK	399. John Larsen Anchorage, AK	400. Evelyn Austin Anchorage, AK
401. Jennifer Cornell Anchorage, AK	402. Laura Murph Juneau, AK	403. R Gordy Vernon Homer, AK	404. Kerry Ivory Ouzinkie, AK
405. Craig Anderson Fairbanks, AK	406. Charles Haley Jr Sitka, AK	407. Robert Haan Anchorage, AK	408. Michael Henry Kenai, AK
409. Amy Dittmar Juneau, AK	410. David Weeks Ninilchik, AK	411. Sean Donahue Anchorage, AK	412. Todd Winter Anchorage, AK
413. Colin Hurley Eagle River, AK	414. Larry Miller Talkeetna, AK	415. Todd Steiner Homer, AK	416. Evelyn Harden Homer, AK
417. Matthew Pyhälä Kenai, AK	418. Andrew Mueller Palmer, AK	419. Jon Gregg Fairbanks, AK	420. Kathrin Mccarthy Juneau, AK

421. Emily Wright Juneau, AK	422. Donald Snovel Palmer, AK	423. Terrence Mccabe Valdez, AK	424. Jesse Carter Cordova, AK
425. Peter Lunoe Anchorage, AK	426. Katie Arnberg Valdez, AK	427. Victor Demoski Sr Anchorage, AK	428. Kassandra Taggart
429. Tammy Chulick Kasilof, AK	430. Michael Limacher Homer, AK	431. Sasha Anderstrom	432. Randi Perlman Wasilla, AK
433. Nedra Boze Soldotna, AK	434. Sebastian Draeger	435. Dena Boughton Eagle River, AK	436. Mark Ha Anchorage, AK
437. Ruth Garrison Bethel, AK	438. Darrell Garrison Anchorage, AK	439. Janie Jensen Yakutat, AK	440. Lloyd Fanter Eagle River, AK
441. Jeffery Johnson Anchorage, AK	442. Natalie Harder Anchorage, AK	443. Seth Koetitz Soldotna, AK	444. Jerry Farrington Soldotna, AK
445. Melva Krogseng Soldotna, AK	446. Martaelena Ochoa Mcnatt	447. John Stauffacher Sterling, AK	448. Kong Ly Wasilla, AK
449. Brent Davies Chugiak, AK	450. Brad Branson Sr Willow, AK	451. Steven Vincent Soldotna, AK	452. Joshua Duong Juneau, AK
453. Michael Priebe Anchorage, AK	454. Marni Levanger Anchor Point, AK	455. Michael Mclean Fairbanks, AK	456. Anneliese Kupfrian
457. Kelsi Miller Anchorage, AK	458. Charles Ross Palmer, AK	459. Mindy Latteier Eagle River, AK	460. Rich Sonnen Homer, AK
461. Olivia Vincent Homer, AK	462. Thomas Must Kodiak, AK	463. Jasper Marder Talkeetna, AK	464. Jacqui Stanley Sterling, AK
465. Tim Cowan Soldotna, AK	466. Kasey Nielsen Fairbanks, AK	467. Tara Craig Anchorage, AK	468. Tamara Rothman Anchorage, AK
469. Philip Roth Ketchikan, AK	470. Bonita Aderman Palmer, AK	471. Donald Mike Chugiak, AK	472. Sharon Walluk Eagle River, AK
473. Josh Scollard Anchorage, AK	474. Randy Moore Chugiak, AK	475. Deanne Pearson Soldotna, AK	476. Megan Henry Anchorage, AK
477. Steven Hall Eagle River, AK	478. Gabrielle Karpinsky	479. Sarah Mastroni Anchorage, AK	480. Masha Lazutkina Anchorage, AK

481. Sophie Agnew  
Seward, AK
485. Noel Therrien  
Girdwood, AK
489. Michael  
Polushkin
493. Noralie Jennings-  
Voigt
497. Renata Sweet  
Seldovia, AK
501. Terry Mccoy  
Willow, AK
505. Sam Steele  
Anchorage, AK
509. Sparrow Gray  
Talkeetna, AK
513. Victoria Provenza  
Seward, AK
517. Frank Ryman III  
Yakutat, AK
521. Marry Knutsen  
Yakutat, AK
525. Dylan Peterson  
Yakutat, AK
529. John P Burden Jr  
Wasilla, AK
533. Beverly Hoffman  
Bethel, AK
537. John Ledoux  
Anchorage, AK
482. Greg Markle  
Copper Center, AK
486. Jennifer Osborn  
Soldotna, AK
490. Ahmika Kluka  
Sitka, AK
494. Heidi Wong  
Clam Gulch, AK
498. Pax Templeton  
Anchorage, AK
502. Brett Lange  
Homer, AK
506. Paul Badalich  
Anchorage, AK
510. Austin Pajak  
Yakutat, AK
514. Debra Lekanoff  
Yakutat, AK
518. Trisha Costello  
Talkeetna, AK
522. Gwen Swanson  
Anchorage, AK
526. Marvin Lake  
Anchorage, AK
530. Jerry Bixby  
Soldotna, AK
534. Agnes Beans  
Wasilla, AK
538. Tom Bachert  
Fairbanks, AK
483. James Sullivan  
Chugiak, AK
487. Abi Berlet  
Anchorage, AK
491. Haley Hirsch  
Anchorage, AK
495. Stacy Corbin  
Cooper Landing, AK
499. Nicholas Corbin  
Kenai, AK
503. Randy Branning  
Delta Junction, AK
507. Tom Peel  
Homer, AK
511. Katharine Del  
Castillo
515. Albert Daniels  
Wasilla, AK
519. Teresa Swanson  
Yakutat, AK
523. Dyllon Mcintosh  
Anchorage, AK
527. Petra Wilm  
Anchorage, AK
531. Dain Douthit  
Kenai, AK
535. Karen Gillis  
Anchorage, AK
539. William Wunnicke  
Anchorage, AK
484. Caroline  
Rasimowicz
488. Mariah Thornsley  
Palmer, AK
492. Jeremy Hunter  
Girdwood, AK
496. Ian Waskey  
Anchorage, AK
500. Robert Hartley  
Anchorage, AK
504. Abby Morrison  
Anchorage, AK
508. Luca Gray  
Talkeetna, AK
512. Jessica Jensen  
Yakutat, AK
516. Andrew Gray  
Yakutat, AK
520. Bea Gallagher  
Wasilla, AK
524. Monica Gallagher  
Wasilla, AK
528. Ronald Rodgers  
Soldotna, AK
532. Andrew Seppi  
Wasilla, AK
536. Jacqueline  
Muehlbauer
540. Kristine Harder  
Haines, AK

541. Ravnit Lachapelle Anchorage, AK	542. Hannah Pratt Anchorage, AK	543. Karma Ulvi Eagle, AK	544. Dylan Moore Anchorage, AK
545. John Rodgers John Rodgers	546. Malory Moskovitz Anchorage, AK	547. Hohn Tonuchuk Kotlik, AK	548. Mike Schierman Wasilla, AK
549. Cheri Brukardt Eagle River, AK	550. Philip Bottrell Eagle River, AK	551. Jeanne Tatangelo Eagle, AK	552. Clint Hammer Anchorage, AK
553. Allan Sherman Anchorage, AK	554. Dana Ulvi Eagle, AK	555. Roxanne Thurman	556. Doug Hill Palmer, AK
557. Miquelle Milner Kenai, AK	558. Brook Clock Seward, AK	559. Scott Jones Palmer, AK	560. Helen Mcneil Anchorage, AK
561. Klara Hamby Sutton, AK	562. Aspen Marlin Homer, AK	563. Crystalyn Lemieux	564. Jodi Benham Anchorage, AK
565. Carol Torrey Anchorage, AK	566. Jerry O'Brien Nikiski, AK	567. Richard Nicholson Jr	568. Daniel Solomon Anchorage, AK
569. Mary Ann Batchelder	570. Robert Schmidt Jr Seward, AK	571. Kaiden Bogie Homer, AK	572. Mike Chulick Kasilof, AK
573. Tim Latham Ninilchik, AK	574. Kimberly Burke Fairbanks, AK	575. Leonard Jewkes North Pole, AK	576. Moriah Conkel Homer, AK
577. Ainsley Haukaas Anchorage, AK	578. Angela Ferrari Anchorage, AK	579. Tyler Greenhalgh Soldotna, AK	580. Susan Pacillo Homer, AK
581. Chung Nim Ha Anchorage, AK	582. Shawn Grimes Homer, AK	583. Erik Boltman Wasilla, AK	584. Michael Dalton Anchor Point, AK
585. Karen Johnson Sitka, AK	586. Paul Olson Sitka, AK	587. Ric O Ruttum Anchorage, AK	588. James McCormick
589. Yom Young Homer, AK	590. Ashlan Hooton Anchorage, AK	591. L. Marie Mcintire Kasilof, AK	592. Erma Milspaugh Eagle River, AK
593. Michael Rheam Anchorage, AK	594. Deborah Kenshalo	595. Mari Mahanna Anchorage, AK	596. Kent Mahanna Anchorage, AK
597. Chris Wiita Anchorage, AK	598. Theresa Donhauser	599. Robert Donhauser	600. Ron Rowland Eagle River, AK

601. Karl Van Buskirk Seward, AK	602. Burt Christian Anchorage, AK	603. Michelle Pearson Wasilla, AK	604. Jerry Nash Wasilla, AK
605. Brandon Mcbride Palmer, AK	606. Nathan Perkins Anchorage, AK	607. Lori Campbell Anchorage, AK	608. Lori Burroughs Chugiak, AK
609. Travis Duft Eagle River, AK	610. Darlene Wright Glennallen, AK	611. Duane Babcock Glennallen, AK	612. Marissa Senger Copper Center, AK
613. Matthew Senger Copper Center, AK	614. Don Burroughs Chugiak, AK	615. Joselyn Angstman Anchorage, AK	616. Chase Liland Anchorage, AK
617. Phillip Durousseau	618. Michael Harter Wasilla, AK	619. Kyle Therrien Anchorage, AK	620. Savannah Plank Sitka, AK
621. Jeremy Plank Sitka, AK	622. Doug Schoessler Seward, AK	623. Christopher Bitz Eagle River, AK	624. Damian Schlegel Anchorage, AK
625. Marcelle Schlegel Anchorage, AK	626. Jeff Moore Wasilla, AK	627. Amy Moore Wasilla, AK	628. Cliff Ambro Anchorage, AK
629. Erik Anderson Anchorage, AK	630. Kate Bender Anchorage, AK	631. Tom Bollaert Anchorage, AK	632. Dana Kewan Anchorage, AK
633. Don Mccann Anchorage, AK	634. Michelle Renfrew Anchorage, AK	635. Heather Coletti Anchorage, AK	636. Ben Mallicant Anchorage, AK
637. Mike Hammer Anchorage, AK	638. Sam Nadeen Anchorage, AK	639. James Lina Anchorage, AK	640. Gary Severtson Palmer, AK
641. Crystal Coulter Anchorage, AK	642. Jay Coulter Anchorage, AK	643. Dave Mueller Wasilla, AK	644. Rhonda Mueller Wasilla, AK
645. Kongly Wasilla, AK	646. Olivia Hrnby Wasilla, AK	647. Kathy Thompson Wasilla, AK	648. Michele Bentz Wasilla, AK
649. Chris Bentz Wasilla, AK	650. Serena Hanbey Perless	651. Robbin Copers Valdez, AK	652. Samantha Addler Valdez, AK
653. Rebecca Walker Valdez, AK	654. James Tucker Tuscaloosa, AL	655. Karen Spradlin Jacksonville, AL	656. Lauren Richie Pleasant Grove, AL
657. Jennifer Coleman Huntsville, AL	658. Izabelle Kazmarcxyn	659. Linda Shumate Paron, AR	660. Valerie Paterson Pocahontas, AR



661. Gerry Milliken Cottonwood, AZ	662. D'Anne Macneil Mesa, AZ	663. Jewell Batway Apache Junction, AZ	664. Gage Counts Goodyear, AZ
665. Dan Heffernan Glendale, AZ	666. Stephan Donovan Oro Valley, AZ	667. Barbara Mathes Rio Rico, AZ	668. Betty Winholtz Morro Bay, CA
669. Phyllis Chavez Santa Monica, CA	670. Edie Bruce El Cerrito, CA	671. Vic Bostock Altadena, CA	672. Alice Polesky San Francisco, CA
673. JI Angell Rescue, CA	674. Roger Hollander Tarzana, CA	675. Sondra Boes Campbell, CA	676. Lisa Ann Kelly And Family
677. Krista Dana Sunnyvale, CA	678. Ann Wasgatt Roseville, CA	679. Elizabeth Darovic Monterey, CA	680. Sue Hall Castro Valley, CA
681. John Oda San Francisco, CA	682. Miriam Baum Rancho Cucamonga,	683. Arthur Webb Gilroy, CA	684. Neal Steiner Los Angeles, CA
685. Darcy Skarada Kelseyville, CA	686. Harry Knapp Riverside, CA	687. Robin Vantassell Summerland, CA	688. Melissa Williams La Quinta, CA
689. Alena Jorgensen Temple City, CA	690. Andy Lupenko Lemon Grove, CA	691. Aj Cho San Leandro, CA	692. Forest Frasier Benicia, CA
693. Alexa McMahan Huntington Beach, CA	694. Norm Wilmes Yuba City, CA	695. Linda Freeman Yuba City, CA	696. Linda Albrecht South Lake Tahoe, CA
697. Chris George Beverly Hills, CA	698. Craig Barton Healdsburg, CA	699. Taylor Walker San Francisco, CA	700. Linda Dyer Millard Portola Valley, CA
701. Vibeke Strand Portola Valley, CA	702. L P Felton Los Angeles, CA	703. Alice Ford Los Angeles, CA	704. Colin Epstein Berkeley, CA
705. Kiana Reyes San Mateo, CA	706. Beth Woodruff StudioCity, CA	707. Mo Tidemanis San Clemente, CA	708. Edward Lemon Sebastopol, CA
709. Heidi Lemon Sebastopol, CA	710. Roy Ferguson Aurora, CO	711. Molly Ross Castle Rock, CO	712. Jonette Bronson Telluride, CO
713. Del Stiewert Colorado Springs, CO	714. Laura Waterworth Aurora, CO	715. Sandra Varvel Greeley, CO	716. Tanya Piker La Junta, CO
717. Nicole Rymarz Arvada, CO	718. Carl Nilson Clifton, CO	719. Barbara Macalpine	720. Pete Sullivan Stamford, CT

721. Susan Goldstein West Hartford, CT	722. Maure Briggs Vernon Rockville, CT	723. John Curotto Quinebaug, CT	724. Joann Koch Lebanon, CT
725. Bob Ange Groton, CT	726. Shelley Wehrly Old Saybrook, CT	727. Carol Collins Dover, DE	728. Mary Johnson Edgewater, FL
729. Felicity Hohenshelt	730. Linda Vopicka Tampa, FL	731. Elizabeth Scherbak	732. Martha Burton Lakewood Ranch, FL
733. Michele Laporte Lakeland, FL	734. Jane Wiley Tampa, FL	735. Barb Morrison Clearwater, FL	736. George Craciun Thonotosassa, FL
737. Anna Louise E. Fontaine	738. Patricia Deluca Nokomis, FL	739. Suzy Siegmann Temple Terrace, FL	740. Nancy Neumann Clearwater, FL
741. Kathleen Shabi Palm Coast, FL	742. Vincent Rusch Panama City Beach, FL	743. Marisa Marulli West Palm Beach, FL	744. Michele Kurucz Peel
745. Jon King St Augustine, FL	746. Patricia Bilden Palm Beach, FL	747. Dennis Creech Saint Petersburg, FL	748. Linda Fortier Juno Beach, FL
749. Michelle Hall Boynton Beach, FL	750. Cara Woods Sebastian, FL	751. Samantha Marulli Palm Beach, FL	752. Kathy Fieldee Acworth, GA
753. Kathy Chancellor Columbus, GA	754. Patricia Kipchak Kailua, HI	755. Jody Gibson Des Moines, IA	756. Janet Romine Des Moines, IA
757. Paul Patterson Idaho Falls, ID	758. David Pease Victor, ID	759. Carmen Chacon Pocatello, ID	760. Gisela Zech Boise, ID
761. Sheryl Berg Idaho Falls, ID	762. Stephanie Austad Idaho Falls, ID	763. David Pace Idaho Falls, ID	764. Nicholas Bridgett Champaign, IL
765. Renee Lorengo Wenona, IL	766. Linda Bridges Athens, IL	767. Michael Rynes Naperville, IL	768. Allison Fradkin Northbrook, IL
769. Roberta Kessler Crest Hill, IL	770. Ryan Nestler Pecatonica, IL	771. Jennifer Smith Chicago, IL	772. Don Biciste Kildeer, IL
773. Margaret Knight Downers Grove, IL	774. Bruce Hlodnicki Indianapolis, IN	775. Joshua Seff Lexington, KY	776. Elizabeth Butler Henderson, KY
777. Helen Heddens Prospect, KY	778. Stanley Hastings Florence, KY	779. Steven Becker Covington, LA	780. Tyra Pellerin New Orleans, LA

781. V. Henry Dodd III  
Keithville, LA
785. Peter Tiffany  
Wellfleet, MA
789. Diana Goth  
Ellicott City, MD
793. Joanne Negola  
Gaithersburg, MD
797. Josie Cone  
Portland, ME
801. Daniel Solano  
Detroit, MI
805. William Ehnis  
Tecumseh, MI
809. Harold Watson  
Springfield, MO
813. Rochelle  
Gravance
817. Robert Moore  
Wake Forest, NC
821. David Jessup  
Trent Woods, NC
825. Susan Mitchell  
Windham, NH
829. Lorraine Brabham  
Hoboken, NJ
833. Laura Taylor  
San Jose, NM
837. Mark Ferguson  
Brooklyn, NY
782. Barbara Abraham  
Leominster, MA
786. Bill Allan  
Eastham, MA
790. Barbara Myers  
Garrett Park, MD
794. Rosalind Ivens  
Bucksport, ME
798. Richard Smith  
Melvindale, MI
802. Paul Kripli  
Grand Rapids, MI
806. Karen Walker  
Cohasset, MN
810. Nezka Pfeifer  
Saint Louis, MO
814. Skye Raiser  
Bozeman, MT
818. Cindy Shoaf  
Salisbury, NC
822. Sara Rice  
Leland, NC
826. Ernest Mellon  
Southampton, NJ
830. Nancy Madura  
Hewitt, NJ
834. Susan Peirce  
Santa Fe, NM
838. Marilyn Derosa-  
Wilkie
783. Carole Smudin  
Bridgewater, MA
787. John Higgins  
North Potomac, MD
791. Robert Goth  
Ellicott City, MD
795. Meryl Pinque  
Bangor, ME
799. Grace Strong  
Ironwood, MI
803. Katie Webber  
Au Train, MI
807. Heidi Ahlstrand  
Owatonna, MN
811. Kt Hertfelder  
Ballwin, MO
815. James Shelden  
Bozeman, MT
819. Heide Coppotelli  
Cedar Mountain, NC
823. Bobbi Kelly  
Charlotte, NC
827. Mary Rivas  
Morris Plains, NJ
831. Edward Madura  
Hewitt, NJ
835. Louise Bass  
Albuquerque, NM
839. Janet Forman  
New York, NY
784. Wendy Fossa  
Essex, MA
788. Marc And Alice  
Marc Marc And Alice  
Imlay
792. R Lewison  
Silver Spring, MD
796. Lenore Sivulich  
New Gloucester, ME
800. Haven Knight  
Lake Ann, MI
804. Mary Ann C.  
Shumaker
808. Melissa Cathcart  
Minneapolis, MN
812. Nellie Medlin  
Holly Springs, MS
816. Kicab Castaneda-  
Mendez
820. Christian Ponds  
Wilmington, NC
824. Maryom Farahani  
Browns Summit, NC
828. Steve Troyanovich  
Florence, NJ
832. Janet Allocca  
Chester, NJ
836. Derek Gendvil  
Las Vegas, NV
840. Naomi Klass  
Bethel, NY

841. Claire Prevost  
Granby, NY
845. Scott Korman  
Floral Park, NY
849. Amy Kalblein  
Port Jervis, NY
853. Jean Hanson  
Avon, OH
857. Mary Zahler  
North Canton, OH
861. Sherry Monie  
Damascus, OR
865. Scott Kennedy  
Keizer, OR
869. Garrison Goth  
Roseburg, OR
873. Nicola Nicolai  
Chester Springs, PA
877. Devorah Soodak  
Philadelphia, PA
881. Charlene Rush  
Allison Park, PA
885. R Bv  
Harrisburg, PA
889. Patricia Luck  
Johns Island, SC
893. Lindsay Byrne  
San Antonio, TX
897. Kristin Addison  
Corpus Christi, TX
842. Arlene Zuckerman
846. Sylvia O  
Brooklyn, NY
850. Patricia Vineski  
South Colton, NY
854. Stephen Owen  
West Chester, OH
858. Scott Fengler  
Sand Springs, OK
862. Ian Shelley  
Portland, OR
866. Marie Wakefield  
Newport, OR
870. Heidi Hunger  
Bijsmans
874. James Staszewski  
Pittsburgh, PA
878. Robin Pappas  
Pocono Manor, PA
882. Kevin Mcglynn  
Flourtown, PA
886. Quincy Mccoy  
Devon, PA
890. Christopher  
Marcille
894. Bo Baggs  
Port Arthur, TX
898. Patrick De La  
Garza Und Senkel
843. Brenda Psaras  
East Moriches, NY
847. Jackie Stolfi  
Massapequa Park, NY
851. Dr. Dennis  
Fassman
855. Vicki Wheeler  
Deshler, OH
859. Janna Piper  
Portland, OR
863. Cynthia Hicks  
Portland, OR
867. Georgeanne  
Samuelson
871. Susan Babbitt  
Philadelphia, PA
875. Rosemary  
Delpino
879. Allison Alberts  
Kunkletown, PA
883. Steven Ricklefs  
Seven Valleys, PA
887. Alison Delong  
Barrington, RI
891. Barbara  
Mcmahan
895. L M  
Cypress, TX
899. R. Simpson  
Denton, TX
844. Michael Brandes  
White Plains, NY
848. Michele Johnson  
Yorktown Heights, NY
852. Joan Ehrlich  
Brooklyn, NY
856. Michael Norden  
Defiance, OH
860. Debra Rehn  
Portland, OR
864. Grace Godfrey  
Corvallis, OR
868. Noelle Edwards  
Butte Falls, OR
872. Carrie Swank  
Reading, PA
876. Anne Jackson  
Birdsboro, PA
880. Elizabeth Seltzer  
Media, PA
884. Jesse Saunders  
Unionville, PA
888. Kathy Bradley  
Lugoff, SC
892. Chantal Eldridge  
Austin, TX
896. J. M.  
Cypress, TX
900. Daniel Wise  
Farmersville, TX

901. Michael Pugh El Paso, TX	902. Catherine Croom Bulverde, TX	903. Thomas Ikeda Hewitt, TX	904. T Blake Prosper, TX
905. Alexi Charter Boulder, UT	906. Thomas Seitz Park City, UT	907. Carol Metzger Kents Store, VA	908. Pat Mace Spotsylvania, VA
909. Aaron Pierce Alexandria, VA	910. Vera England Urbanna, VA	911. Maria Steyaart Waterbury, VT	912. Kim Seater Seattle, WA
913. Jon Boyd Walla Walla, WA	914. Janice Wilfing Port Angeles, WA	915. Christina Davis Spanaway, WA	916. Kirsten Hill Olympia, WA
917. Lawrence Hill Twisp, WA	918. Virgene Link-New Anacortes, WA	919. Donna Dimof Silverdale, WA	920. Angie Dixon Seattle, WA
921. Barbara Rosenkotter	922. Becky Hardey La Conner, WA	923. James Mulcare Clarkston, WA	924. Andrew Halverson
925. Barbara Blackwood	926. Jacquelyn Sidor Aberdeen, WA	927. Su Reeves Bothell, WA	928. Margo Finch Marysville, WA
929. Joella Rosendahl Seabeck, WA	930. Stefanie Harris Sammamish, WA	931. Ryan Fleming Seattle, WA	932. Joan Oosterwyk Cottage Grove, WI
933. Kathleen Trochlell Mercer, WI	934. Daniel Rewolinski Milwaukee, WI	935. Carl Stapler Evanston, WY	936. Keeber Bran
937. Sheri Baylor	938. Olaf Totland	939. Pandora Totland	940. Tom Rotiloff
941. Paul Pavlik	942. Joe Valle	943. Meg Waite	944. Umani Mineweased
945. P.L. Boggess	946. Molly Kenick		

March 2, 2026

Dear Chair Carlson- Van Dort and Alaska Board of Fisheries members:

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Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

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- Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.
  - Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.
  - Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.
- 

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

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Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

Sincerely,

Steele Davis  
 Owner/operator  
 Spirit of Alaska Wilderness Adventures  
 Larsen Bay, AK

Justin Shoffner Owner  
 Alpenglow Coffee House  
 Girdwood, AK

Nathanael Ferguson  
 Owner  
 Savory Alaska  
 Oatmeal, TX

Jim Steffen  
 Owner  
 Norcoast Marine Surveyors, Inc  
 Sitka, AK

Mike and Sally Trotter  
 Owners  
 Baranof Wilderness Lodge  
 Beyond Boundaries Expeditions  
 Sitka, AK

Larry Powell  
 Vice President Co-Owner  
 Mallott's General Store Inc  
 Yakutat, AK

Natalie Sattler  
 Program Director Alaskans  
 Own  
 Sitka, AK

April Woods  
 Owner  
 Animal Daycare & Boarding  
 Anchorage, AK

Kate Crump  
 Co-owner & operator  
 The Lodge at 58\* North  
 King Salmon, AK

Adam Cuthriell  
 Owner  
 FishHound Expeditions  
 Willow, AK

Jon Boyd  
 Owner  
 River King Outfitters  
 Dillingham, AK

Sarah Spies  
 Owner-Operator  
 Big Dan's Fishing Charter  
 Soldotna, AK



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

Re: Pelagic Trawl Proposals 163,164,165

Dear Members of the Board,

We submit the following comments on behalf of the Alaska Longline Fishermen's Association (ALFA) regarding Proposals 163-165. ALFA represents commercial fishermen, seafood processors, businesses, and individuals who rely on Alaska fisheries and work to promote sustainable fisheries, strong coastal communities, and healthy ecosystems.

## **I. Introduction**

ALFA's members are concerned about the habitat degradation and threats to the sustainability of critical species such as crab, halibut, salmon and rockfish resulting from seafloor contact by trawl gear. These concerns are rooted in direct experience with the negative socioeconomic and ecological impacts from bottom trawling. ALFA championed the Southeast Alaska Trawl Closure Area decades ago and we believe the Southeast Trawl closure demonstrates the long-term ecological and economic value of habitat protection.

The State of Alaska has defined pelagic trawl gear as trawl gear that does not operate in contact with the seabed. However, when a gear type is defined by how it is fished, compliance must be verifiable while fishing is underway. Alaska currently lacks a mechanism for enforcing the state's definition of pelagic trawl and the need for verification is underscored by recent analysis and testimony establishing that pelagic trawl gear is in contact with the seafloor, on average, 40-80% of the time.<sup>1</sup>

**ALFA requests that the Board adopt proposals 163 and 164 to:**

- 1) reclassify "pelagic" trawl gear as "mobile bottom contact" until ADFG establishes a meaningful verification process to enforce the State's definition of pelagic trawl gear; and**
  - 2) establish real time or near real time bottom contact monitoring requirements for pelagic trawl gear operating in State waters currently open to pelagic trawling.**
- Because Southeast Alaska already has a comprehensive trawl closure in place, we recommend these changes be applied to waters west of 140 degrees West Longitude.

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<sup>1</sup> NPFMC. 2022. Bristol Bay Red King Crab Information. Discussion Paper, Agenda Item D1. April 2022.



Non-target species or bycatch is also a concern associated with the use of pelagic trawl gear in state waters. Salmon are a statewide resource with profound cultural, economic, and food-security importance. Where avoidable salmon encounters occur in trawl fisheries, Alaska should require the use of proven mitigation tools to reduce risk and support salmon stewardship.

**ALFA also requests that the Board adopt proposal 165 to require salmon excluders on pelagic trawl gear, a common-sense bycatch avoidance measure already in place in Federal waters.**

If adopted, proposals 163, 164, and 165 would convert the pelagic trawl definition into an enforceable operating standard, direct ADFG to establish clear monitoring and compliance protocols, and require salmon excluders to reduce bycatch. ALFA strongly supports these actions. At minimum, ALFA maintains that the Board should clearly commit to the existing State definition of pelagic trawl gear and initiate a process that leads to an enforceable standard and monitoring procedure to limit seafloor contact. To incentivize industry cooperation, ALFA urges the Board to eliminate the existing enforcement loophole that allows “pelagic” trawling, which has known seafloor contact, to operate in areas and at times closed to bottom trawling.

## II. Why Protect Habitat from Bottom Trawling

ALFA has worked for decades to protect seafloor habitats and minimize bycatch of key species. In the early 1990s, trawl activity increased off of Southeast Alaska resulting in high levels of rockfish bycatch that threatened to preempt local fisheries. ALFA proposed a trawl ban across Southeast Alaska in order to protect cold-water coral habitats and regional fishery resources, with wide support from regional communities, fishermen, and the State of Alaska. As a result, in 1998, the North Pacific Fishery Management Council recommended, and the Secretary of Commerce approved, a ban on trawling in federal waters off Southeast Alaska. The Board of Fisheries promptly mirrored that action to close all state waters off Southeast Alaska to trawling, bottom and pelagic, with a limited exception for shrimp beam trawls. The history of the Southeast Trawl closure, including the ecological and socioeconomic reasons for its implementation, are well documented in the report linked [HERE](#).

### Corals and sponges:

Research documents that corals and sponges form some of the most important habitats in deep, cold oceanic waters.<sup>2</sup> They provide nursery grounds, refuge for species seeking shelter, and critical foraging areas for fish and shellfish valued as high quality seafood.<sup>3</sup> Many of these habitats west of Southeast Alaska remain vulnerable to seafloor contact by trawls. Proposals 163 and 164 drive meaningful action to restrict seafloor contact by pelagic trawls through implementation of effective monitoring and enforcement standards. The proposals request that

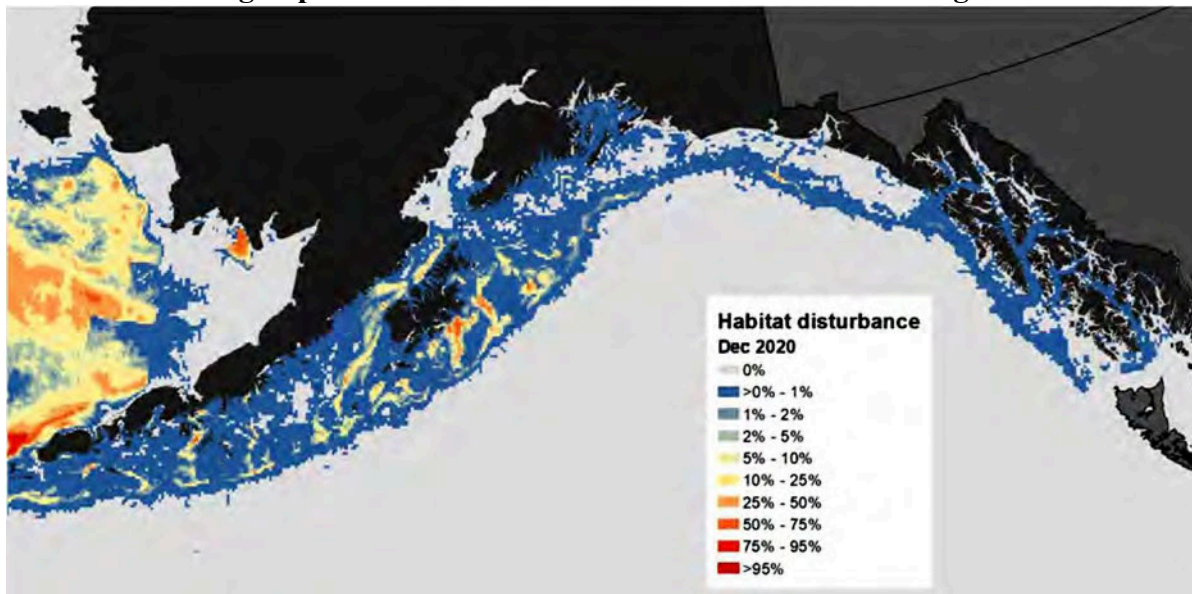
<sup>2</sup> Hourigan, T.F., Etnoyer, P.J. & S.D. Cairns. 2017. Introduction to the state of deep-sea coral and sponge ecosystems of the United States. In: Hourigan, T.F., Etnoyer, P.J. & S.D. Cairns (eds.). *The State of Deep-Sea Corals and Sponge Ecosystems of the United States*. NOAA Technical Memorandum NMFS-OHC-4. Silver Spring, MD. 35 p.; NOAA, Coral Reef Conservation Program. 2010. *NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems: Research, Management, and International Cooperation*. Silver Spring, MD: NOAA Coral Reef Conservation Program. NOAA Technical Memorandum CRCP 11. 67 pp.

<sup>3</sup> Ragnarsson S.Á. et al. 2016; Andrews, A.H. et al. 2002; Andrews A.H., R.P. Stone, C.C. Lundstrom & A.P. DeVogelaere. 2009. Growth rate and age determination of bamboo corals from the northeastern Pacific Ocean using refined 210Pb dating. *Mar Ecol Prog Ser* 397:173–185; Stone R.P., M.M. Masuda & J.F. Karinen. 2014.

the Board recommit to the existing state definition of pelagic trawl gear and drive compliance to protect seafloor habitat in areas closed to bottom trawling. If these proposals are adopted, the Board can maintain control of this issue through clear enforcement standards.

Most seafood species caught in Alaska use coral and sponge habitats during part or all of their life cycle.<sup>4</sup> The seafloor habitat is “biogenic habitat” because it was constructed by animals – corals and sponges.<sup>5</sup> Smaller species, such as sea pens, grow in softer sediments and form biogenic habitats that resemble shrubby areas or grasslands.<sup>6</sup> Some scientists describe biogenic habitats as “animal forests” because they have ecological functions similar to terrestrial forests that provide habitat for many species.<sup>7</sup> Sea animal forests are crucial to ocean functionality, fisheries sustainability, and human well-being.<sup>8</sup> Indirect ecosystem services to humans include the provisioning of food and maintenance of biodiversity.<sup>9</sup> Direct services to deep sea life include providing substrate for immobile seafloor inhabitants to anchor themselves to, refuge for juvenile fish, and foraging and spawning habitat for adult fish.<sup>10</sup> There are also cultural ecosystem services associated with educational, aesthetic and scientific values.<sup>11</sup>

### Trawling impacts to sea animal forests can be severe and long-term<sup>12</sup>



<sup>4</sup> Stone, R.P. & S.K. Shotwell. 2007.

<sup>5</sup> Pacific Fishery Management Council. 2024. Fishery Management Plan, Appendix C, Part 1.

<sup>6</sup> *Id.*; Rossi S, L. Bramanti, A. Gori & C. Orejas. 2017. An Overview of the Animal Forests of the World. In: Rossi S, Bramanti L, Gori A, Orejas C (eds) Marine Animal Forests: The Ecology of Benthic Biodiversity Hotspots. Springer.

<sup>7</sup> Rossi S. et al. 2017.

<sup>8</sup> Rossi, S. et al. 2017; ; Hourigan, T.F. et al. 2017.

<sup>9</sup> Ragnarsson S.Á., J.M. Burgos, T. Kutti T, I. van den Beld, H. Egilsdóttir, S. Arnaud-Haond & A. Grehan. 2016. The impact of anthropogenic activity on cold-water corals. In: Rossi S, Bramanti L, Gori A, Orejas Saco del Valle C (eds) Marine Animal Forests: The Ecology of Benthic Biodiversity Hotspots. Springer International Publishing, Switzerland; NOAA, Coral Reef Conservation Program. 2010.

<sup>10</sup> NOAA, Coral Reef Conservation Program. 2010.

<sup>11</sup> Ragnarsson S.Á. et al. 2016.

<sup>12</sup> Graphic: Zaleski, M., T.S. Smeltz, S. Rheinsmith, J.L. Pirtle & G.A. Harrington. 2023. 2022 Evaluation of Fishing Effects on Essential Fish Habitat. January 2023. Figure 3. Gulf of Alaska cumulative percentage habitat disturbed. All gears combined.

Bottom trawling has been identified as the most significant and pervasive anthropogenic threat to cold-water coral, sponge and other seafloor habitats worldwide and in Alaska.<sup>13</sup> Researchers cite the extensive use of trawl gear and its forceful impacts on the seafloor, the large area covered, and the severe impacts which include dislodging or crushing large corals and sponges anchored to the seafloor, transforming them into piles of broken rubble.<sup>14</sup> Other anthozoans (species anchored to the seafloor) such as sea pens and sea whips are also vulnerable to trawls that contact the seafloor.<sup>15</sup> Continuous contact by trawls alters other deep sea habitats as well, including leveling the seafloor surface.<sup>16</sup>

The cumulative area towed over by trawls is typically the most extensive human impact on the seafloor.<sup>17</sup> Trawls can contact the seafloor along a continuous path, leaving an extensive footprint by carving a swath up to 500 feet wide for the length of a tow.<sup>18</sup> Fixed gears can also impact biogenic habitats, but the narrow footprint is orders of magnitude smaller than that of trawling.<sup>19</sup> “Pelagic” (3,176 mi<sup>2</sup>) and non-pelagic trawls (12,659 mi<sup>2</sup>) are responsible for the overwhelming majority of bottom contact in Gulf of Alaska fisheries (17,735 mi<sup>2</sup>).<sup>20</sup> **Pelagic trawls alone make more bottom contact than all other Gulf of Alaska fisheries combined.**<sup>21</sup> The estimated area impacted by trawl gear in Alaska every three years – over 275 million acres – can be nearly 10 percent of the seafloor in the Gulf of Alaska and up to one-third of the seafloor in the eastern Bering Sea.<sup>22</sup>

### Seafloor Recovery time:

Multiple factors make the direct effects to cold-water corals and sponges substantial and enduring: (1) slow growth rates, which range from mere millimeters to a few centimeters per year; (2) extreme recovery times for species with life spans up to several hundred years; (3) low reproductive rates, with recruitment events for undamaged species occurring infrequently, perhaps once per decade and (4) fragility that makes them highly vulnerable to physical impacts caused when trawls contact the seafloor.<sup>23</sup> These life history characteristics mean that once damaged or removed, habitat recovery is very slow and may take decades, centuries, or even millennia after trawling impacts have ceased.<sup>24</sup>

<sup>13</sup> Hourigan, T.F. et al. 2017. Stone, R.P. & Rooper, C.N. 2017. State of Deep-Sea Coral and Sponge Ecosystems in the Alaska Region; Ragnarsson S.Á. et al. 2016; Rossi S. et al. 2017; Freese, J.L. et al. 1999; NOAA, Coral Reef Conservation Program. 2010.

<sup>14</sup> *Id.*; Clark M.R. et al. 2016; Hogg, M.M. et al. 2010; Stone, R.P. & S.K. Shotwell. 2007.

<sup>15</sup> Malecha, P.W. & R.P. Stone. 2009. Response of the sea whip *Halipterus willemoesi* to simulated trawl disturbance and its vulnerability to subsequent predation. *Mar Ecol Prog Ser* 388:197–206.

<sup>16</sup> Freese, J.L. et al. 1999.

<sup>17</sup> Clark, M.R., F. Althaus, T.A. Schlacher A. Williams, D.A. Bowden & A.A. Rowden. 2016. The impacts of deep-sea fisheries on benthic communities: A review. *ICES J Mar Sci* 73:i51-i69.

<sup>18</sup> *Id.*; Heifetz, J. et al. 2009.

<sup>19</sup> Hourigan, T.F. et al. 2017; Heifetz, J. et al. 2009.

<sup>20</sup> Zaleski, M. et al. 2023. *See* Table 1. Fishing area contact adjusted footprint (CAF) by region and sector, all fishing 2016-2020.

<sup>21</sup> *Id.*

<sup>22</sup> Amoroso, R.O., Pitcher, C.R., Rijnsdorp, A.D., McConnaughey, R.A., Parma, A.M., Suuronen, P., Eigaard, O.R., Bastardie, F., Hintzen, N.T., Althaus, F. & Baird, S.J., 2018. Bottom trawl fishing footprints on the world’s continental shelves.

<sup>23</sup> Althaus, F., A. Williams, T.A. Schlacher, R.J. Kloser, M.A. Green, B.A. Barker, N.J. Bax, P. Brodie & M.A. Hoenlinger-Schlacher. 2009. Impacts of bottom trawling on deep-coral ecosystems of seamounts are long-lasting. *Mar Ecol Prog Ser* 397:279-294; Stone, R.P., P.W. Malecha & M.M. Masuda. 2017; Hourigan, T.F. et al. 2017; Clark M.R. et al. 2016.

<sup>24</sup> Hiddink J.G., S. Jennings, M.J. Kaiser, A.M. Queiros, D.E. Duplisea & G.J. Piet. 2006. Cumulative impacts of seabed trawl disturbance on benthic biomass, production, and species richness in different habitats. *Can J Fish Aquat Sci* 63:721- 736; Hourigan, T.F. et al. 2017; Clark M.R. et al. 2016.

There has been significant coral and sponge bycatch, causing considerable habitat loss.<sup>25</sup> The largest losses occurred in the eastern Bering Sea and the Aleutian Islands.<sup>26</sup> During the 1990s and early 2000s, the bycatch of sponges, corals and smaller bottom dwelling species approached half a million pounds per year, mostly in bottom trawl fisheries.<sup>27</sup> Available bycatch estimates do not include potential unobserved mortality of damaged or detached corals, which may be substantial because of widespread seafloor disturbance in some areas.<sup>28</sup> Even though NMFS implemented closures in the Aleutian Islands and other measures during the 2000s that prevented the expansion of bottom trawling into unfished areas, there is significant ongoing coral and sponge bycatch and conserving remaining habitats in impacted areas is a primary concern.<sup>29</sup>

### **Deep Sea Mud & Soft Sediment Habitats:**

Multiple studies have found that seafloor contact by trawls also changes deep sea mud and other soft-bottom habitats in ways that impair ecosystem functioning and harm marine life.<sup>30</sup> The ecological consequences are similar to those caused by other ocean stressors such as warming and ocean acidification.<sup>31</sup> Studies of impacts to soft-bottom habitats compare trawling to intensive agricultural ploughing.<sup>32</sup> Ploughing land may occur just a few times a year, but bottom contact by trawls may occur frequently over the same surface.<sup>33</sup>

A 2005 study compared the distribution and abundance of seafloor species at two overlapping soft-sediment sites in the Gulf of Alaska.<sup>34</sup> One site was subject to high intensity trawling and the other site had been closed to bottom trawling for over a decade.<sup>35</sup> Trawled areas had lower species richness and significantly fewer low-mobility prey available for foraging groundfish.<sup>36</sup> Researchers identified evidence of prey depletion as a “red flag.”<sup>37</sup>

To summarize: repeated trawling displaces and redistributes sediments, smothers seafloor species, levels the seafloor surface and reduces habitat complexity by removing structural features.<sup>38</sup> Impacts vary depending on seafloor type and benthic communities but in general the habitat will be less productive after trawling.<sup>39</sup> The frequent seafloor disturbance

<sup>25</sup> Hourigan, T.F. et al. 2017; Heifetz, J. et al. 2009; 70 Fed. Reg. 39700 (July 11, 2005); Stone, R.P. & S.K. Shotwell. 2007.

<sup>26</sup> 70 Fed. Reg. 39700 (July 11, 2005); Hourigan, T.F., Etnoyer, P.J. & S.D. Cairns. 2017; Hogg, M.M. et al. 2010.

<sup>27</sup> Stone, R.P. & Rooper, C.N. 2017; Hogg, M.M. et al. 2010; 70 Fed. Reg. 39700 (July 11, 2005).

<sup>28</sup> Stone, R.P. & S.K. Shotwell. 2007.

<sup>29</sup> Hourigan, T.F. et al. 2017; Heifetz, J., R.P. Stone & S.K. Shotwell. 2009. Damage and disturbance to coral and sponge habitat of the Aleutian Archipelago. *Mar Ecol Prog Ser* 397:295-303; Stone, R.P. & Rooper, C.N. 2017.

<sup>30</sup> Hixon M.A. & B.N. Tissot. 2007; Rossi S, et al. 2017; Puig, P. et al. 2012.

<sup>31</sup> Puig, P., M. Canals, J.B. Company, J. Martin, D. Amblas, G. Lastras, A. Palanques & A.M. Calafat. 2012. Ploughing the deep sea floor. *Nature* 489:286-289.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> Stone, R.P., M.M. Masuda & P.W. Malecha. 2005. Effects of bottom trawling on soft-sediment epibenthic communities in the Gulf of Alaska. In: Barnes PW, Thomas LP (eds.) *Benthic Habitats and the Effects of Fishing*. Proc American Fisheries Society Symposium 41: 461-475

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*; Rossi S, et al. 2017; Clark M.R. et al. 2016.

<sup>39</sup> Hixon M.A. & B.N. Tissot. 2007.

may delay or prevent habitat forming species from re-establishing themselves on soft bottom seafloors.<sup>40</sup> Changes in nutrient availability impact other sea floor inhabitants.<sup>41</sup>

There are large portions of the Gulf of Alaska where there is a significant amount of coral, sponge and sea pen habitat and other vital habitats for fish that are vulnerable to impacts from trawls that contact the seafloor.<sup>42</sup> During the 2000s, NMFS closed a significant area in the Bering Sea and Aleutian Islands to bottom trawling in large part to address concerns about impacts to biogenic habitats.<sup>43</sup> In the Gulf of Alaska, there are only a few relatively small areas outside of the Southeast Alaska Trawl Closure where NMFS prohibited bottom trawling to protect habitat.<sup>44</sup> Bottom trawling in the Gulf of Alaska frequently removes or damages gorgonian corals, large sponges and boulders, which provide most of the seafloor's multi-dimensional habitat.<sup>45</sup> These impacts are ongoing in state and federal areas open to bottom trawling; they are also ongoing in state and federal waters open to pelagic trawling since the "pelagic" part of the pelagic trawl definition is not enforced. Providing meaningful seafloor protection in state waters currently closed to bottom trawling requires enforcement of the state's pelagic trawl definition— which is the goal of proposals 163 and 164.

### III. What Part of Pelagic Trawls is “Pelagic?”

There is a clear distinction in regulation, if not in practice, between “midwater” or “pelagic” fishing gear and gear deployed on the seafloor or “bottom trawl”. In 5 AAC 39.105c, the State of Alaska defines pelagic trawl as “a trawl where the net, or the trawl doors or other trawl spreading device, do not operate in contact with the seabed, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed.” The requirement that pelagic trawl gear have no protective devices is a common distinguishing feature between pelagic and nonpelagic trawls and is in place to discourage dragging along the seafloor. A pelagic trawl is often described as a “mid-water” trawl, operating off the seabed and away from the fragile habitats and organisms living there. This is theoretically why pelagic trawls are allowed to fish in areas and at times when bottom trawling is banned.

Although regulations governing pelagic trawl components discourage or prohibit seafloor contact, it has long been evident from catch composition — including crab and other benthic species — that bottom interactions occur. Both staff analysis and testimony provided to the North Pacific Fishery Management Council established that this gear type contacts the seafloor on average from 40% to 80% of the time, with rates up to 100% on catcher processor vessels.<sup>46</sup>

<sup>40</sup> Rossi S, et al. 2017.

<sup>41</sup> *Id.*

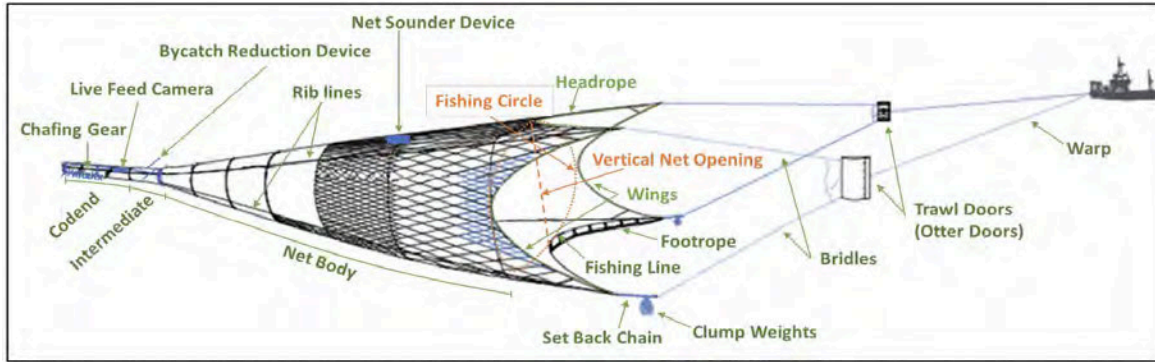
<sup>42</sup> Spaide, Z., Evers, J., Freyvogel, T. & Smith, J. 2023. Bycatch Mitigation Strategies in the Gulf of Alaska. *Journal of Science, Policy & Governance*, 23(1).

<sup>43</sup> 70 Fed. Reg. 39700 (July 11, 2005); Hogg, M.M. et al. 2010.

<sup>44</sup> 70 Fed. Reg. 39700 (July 11, 2005); Graphic credit: Oceana. 2022. Warrenchuk, J., Karnik, J., Mecum, B., Enticknap, B. & Murray, S. 2022. Net loss: the costs of bottom trawling in the Gulf of Alaska.

<sup>45</sup> Freese, J.L. 2001. Trawl-induced Damage to Sponges Observed From a Research Submersible. *Mar Fish Rev* 63:7- 13; Williams A, Schlacher TA, Rowden AA, F, Clark MR, Bowden DA, Stewart R, Bax NJ, Consalvey M, Kloser RJ (2010) Seamount megabenthic assemblages fail to recover from trawling impacts. *Mar Ecol* 31:183-199

<sup>46</sup> NPFMC. 2022. Assessment of the Effect of Fishing on Essential Fish Habitat in Alaska for the 2022 5-year Review. Discussion Paper, Agenda Item D5. February 2022.



Generalized pelagic trawl gear and labeled components.<sup>47</sup>

Clearly the current definition of pelagic trawl gear misrepresents both operation and impact of the gear. The gear should be redefined as bottom trawl gear or mobile bottom contact gear and managed accordingly— or managed to prevent seabed contact. Additionally, the Alaska Department of Fish & Game and the public need to better understand the habitat impacts of what is currently and illogically defined as pelagic trawl gear. Below is a brief history of the North Pacific Fishery Management Council’s (NPFMC) review of this issue to assist the Board with your decision making.

Prior to 1990, the NPFMC definition of pelagic trawl prohibited parts of the trawl from contacting the seafloor in order to minimize halibut and crab bycatch.<sup>48</sup> Subsequent closures to the pollock fishery due to exceeding bycatch allowances motivated a redefinition. First, NMFS prohibited the use of protective devices and seafloor contact, similar to Alaska’s pelagic trawl definition. However, by 1991, the seafloor contact prohibition was deemed unenforceable and removed. The description of the pelagic trawl design was revised with larger mesh sizes and wider line spacing, aiming to reduce halibut and crab bycatch in bottom trawl closure areas from pelagic trawls. The revised gear definition spurred vessel owners to reconfigure their nets accordingly and resulted in users operating “pelagic” trawl gear being able to fish for non-pelagic species, like large pollock. The new definition opened up bottom trawl closure areas to modified pelagic trawl contacting the seafloor but did not reduce bycatch.

In 1993, NMFS adopted a performance standard that prohibited vessels from catching 20 or more crabs. The rationale was that midwater fisheries catch small amounts of benthic species; however, vessels deploying pelagic trawls for pollock on or near the sea bed, catch large amounts of benthic life forms.<sup>49</sup> The final regulation implemented the crab performance standard sought to “discourage” but did not prohibit seafloor contact. This framework remains in effect today, with no enforceable control of bottom contact. The unobserved mortality of benthic species is a current topic of concern in the NPFMC process. Crab are only considered as bycatch if a whole crab can be identified in the catch sample. Parts of a crab do not count as a whole crab, therefore, unobserved mortality is not fully taken into account. The NPFMC will be taking up the issue of the performance standard and pelagic trawl impacts in June 2026.

<sup>47</sup> NPFMC. 2024. Pelagic Trawl Gear Definition Changes. Discussion Paper, Agenda Item D1. February 2024

<sup>48</sup> NMFS. 1993. Groundfish of the Gulf of Alaska; Groundfish of the Bering Sea and Aleutian Islands Area. Proposed Rule. 58 Fed. Reg. 17196. (April 1, 1993).

<sup>49</sup> NPFMC. 2022. Bristol Bay Red King Crab Information. Discussion Paper, Agenda Item D1. April 2022.

While the NPFMC definition fulfilled this industry goal, it should raise concern given the current depleted condition of both halibut and some crab stocks. Does a bottom trawl become a pelagic trawl once all the crab and halibut are gone?

Alaska has long positioned itself as a leader in sustainable fisheries management; it should once again lead by committing to clear, enforceable standards that protect habitat and maintain confidence in the integrity of its fisheries management. NPFMC's current definition merely discourages bottom contact—an ambiguous definition that has been challenged by stakeholders and the public. Alaska has already led the way by upholding a definition that defines pelagic trawls as off-bottom gear— a definition we urge the Board to uphold. In short, ALFA asks that the Board ensure that the pelagic gear definition is not just words on paper, but a standard backed by accountability and action. Due to technological advances since the early 1990s, monitoring devices that provide real time or near real time operational data are not only available but already in use in Alaska. What may have been operationally difficult to enforce in the past is now technologically feasible, as described in the section below.

#### **IV. Tools Available - Bottom Sensing & Bycatch Avoidance**

##### **Proposal 164**

As described previously, trawling on the seafloor imposes another negative externality on fishermen and society because it harms habitats, particularly habitats that support large concentrations of fish species. The lower carrying capacity of trawled habitats reduces the availability of fish to other fishermen immediately and in the future, reducing their catch rates and increasing harvest costs.<sup>50</sup> An investment in gear that ensures fishing activities are in compliance with the regulations designed to protect these resources is critical.

Proposal 164 would require all vessels using pelagic trawl gear in Alaska state waters to be equipped with a seafloor contact detection system. The intent of the proposal is for the Department to develop a workable standard for verifying and enforcing that pelagic trawl gear is operating off of the seafloor. The proposed amendment allows ADF&G to approve sensors or electronic monitoring systems that can detect bottom contact, as well as defining requirements for reporting. If adopted, ADF&G would provide technical assistance and a reasonable time period for implementation and enforcement.

##### **Feasibility of Bottom Contact Sensor Integration:**

Bottom contact sensors are a simple, widely used technology (including some use in Alaska) that can be easily installed on pelagic trawl nets. The vast majority of trawl vessels are already equipped with an integrated acoustic net sensor system to measure things such as door spread, twisting, and catch in order to protect expensive trawl nets, which can cost up to \$300,000. Bottom contact sensors are compatible with these widely used systems and would only require purchasing the sensor unit (quoted at \$6,999 from Notus) and connecting it to current onboard equipment. There are multiple companies that manufacture these sensors including Simrad and Notus, which are popular in Alaska.

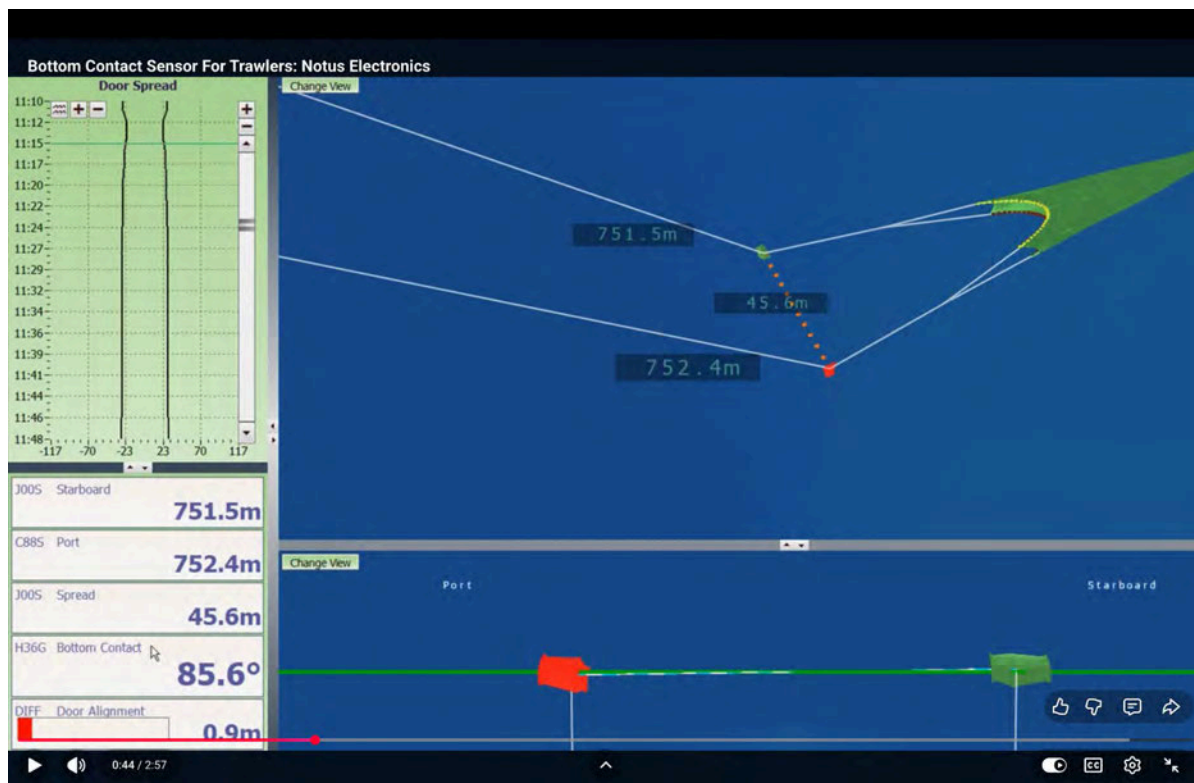
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<sup>50</sup> Foley, N.S. et al. 2012.

Item	Qty	Description	Unit Price	Total
1	1	Trawlmaster Command Unit Lite (TM900ETL)	7,366	7,366
2	1	Trawl Hydrophone (G901)	3,906	3,906
3	1	Bottom Contact, Distance Sensor (801BCR)	6,999	6,999
4	1	Charger for One (1) Sensor (FLC1)	604	604
Total				\$18,875

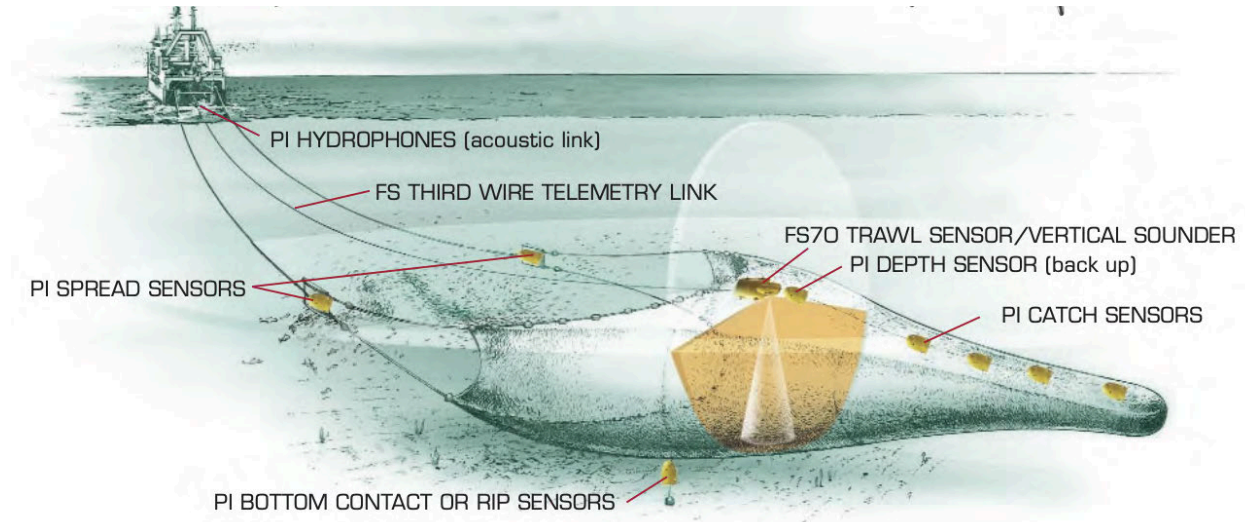
Quote from Notus for the entire Trawlmaster system

Bottom contact sensors used in integration with existing trawl monitoring systems, including the [Trawlmaster](#) from Notus, measure the angle of the trawl tube; when the trawl tube is horizontal, the net is on the bottom. Similar sensors have been used in midwater trawl fisheries across the world. In a [video tutorial](#), Notus explains that the sensors work basically as an angle sensor that attaches to the combination wire, behind the footgear. When the trawl is on bottom, the sensor is horizontal and will indicate an angle of about 90 degrees. When the trawl comes off bottom, the sensor will orient vertically, indicating an angle of approximately 0 degrees.



The Simrad [PI50](#) system is popularly used for a [variety of gear sensors](#) and their bottom contact sensors can fully integrate with other trawl sensors using the same command unit and hydrophone.





[Simrad Diagram](#) illustrates various sensors used together, including Bottom Contact Sensors

While we recognize that requiring sensors and collecting the data will impose costs, ALFA would again note the habitat and socioeconomic costs associated with *not* enforcing the existing regulation that prohibits seabed contact by pelagic trawls. We urge the Board to work with ADFG and fisheries enforcement to establish an enforceable compliance system, with clear standards, monitoring requirements, and repercussions for violations, prior to again allowing pelagic trawling in areas closed to bottom trawling.

### Proposal 165 - Salmon Excluders

Salmon are a statewide resource with profound cultural, economic, and food-security importance. Where avoidable salmon encounters occur in trawl fisheries, Alaska should require the use of proven mitigation tools to reduce risk and support salmon stewardship. Salmon taken as bycatch in trawl fisheries represent fish that would otherwise contribute to harvest opportunities, spawning escapement, or stock rebuilding. The continuing bycatch of these fish, to varying degrees, would be available for harvest by Alaska subsistence, sport and commercial fishermen or would support recovery of salmon populations, which are at such low-abundance levels that Alaska fisheries managers have had to close or severely restrict harvest opportunities. With increased pressure from changing ocean conditions, the protection of salmon stocks in Alaska is ever more pressing.

Bycatch excluders are commonly used to reduce bycatch while maintaining target catch efficiency.<sup>51</sup> There has been large industry buy-in and research into improving the efficacy of excluders and advancing the technology to be species-specific.<sup>52</sup> The use of salmon excluders in trawl gear have been proven to help reduce bycatch in midwater trawl fisheries with research showing salmon escapement rates up to 54% in the Gulf of Alaska.<sup>53</sup> The recent advancements in available technology continue to improve the success rates of excluder devices and decrease

<sup>51</sup> NPFMC. 2025. Pelagic Trawl Gear Innovation. Discussion Paper, Agenda Item C3b. May 2025

<sup>52</sup> NPFMC. 2025. Revised application for an exempted fishing permit (EFP) to develop a chum salmon focused salmon excluder, Agenda Item B2. April 2025

<sup>53</sup> NPFMC. 2015. Central Gulf of Alaska Salmon Excluder EFP 13-01 Final Report, Agenda Item C3. April 2015.

cost for evaluation of the gear.<sup>54</sup> Fishermen and researchers have continued to collaborate on advancements from the original designs in order to improve the efficacy of salmon excluders across the Gulf of Alaska and Bering Sea fleets<sup>55</sup> and have reported higher success rates in recent years.<sup>56</sup>

## V. Conclusion

Trawl fisheries make up 97% of the fishing footprint in the North Pacific. As described above, there is ample evidence worldwide and in the waters off Alaska that bottom trawling alters benthic habitat, changes species composition, and impacts marine life at ecosystem levels. For these reasons, managers have closed areas in both state and federal waters to bottom trawling. Unfortunately, these closures are circumvented by boats towing gear called pelagic trawls despite the frequent and prolonged contact by this gear with the seafloor. The fishery is able to operate in a gray zone without a clear process for accountability.

The time has come for managing agencies to define gear that contacts the seafloor as bottom contact gear, then develop clear and enforceable standards for pelagic trawl gear. To treat pelagic and bottom trawl gear as separate when both contact the seafloor ignores the original intent of differentiating between them. ALFA maintains that those standards should set a low or zero tolerance limit for seafloor contact and we urge the Board to articulate that goal. Clear standards are also necessary to ensure a level playing field so that fishermen who avoid bottom contact are not placed at a disadvantage. **Again, we urge that this action be applied to areas west of Southeast (140 Degrees West Longitude) since Southeast has an effective trawl prohibition in place with a limited exception for the shrimp beam trawl fishery.**

The Department notes in its comments that the North Pacific Fishery Management Council is struggling to address the same issue and that the Board will create confusion between state and federal waters if the State creates an effective definition for pelagic trawls that does, in fact, limit sea floor contact. ALFA offers a different perspective: the Board will catalyze critically important action to protect seafloor habitat by the Council if the Board takes meaningful action at this meeting. We are startled by the Department's deference to federal fisheries managers in their comments on this proposal and urge the Board to lead, rather than defer to the Council on this issue.

Finally, the Board needs little reminder of the state-wide concern for king salmon stocks. Requiring proven devices, such as salmon excluders, in pelagic trawls to reduce bycatch is consistent with the State and the Board's commitment to resource conservation and sustainable fisheries management. These proposals are not designed to close fisheries; instead they are designed to ensure accountability, adaptability, and stewardship so that Alaska's fisheries remain sustainable for future generations.

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<sup>54</sup>National Fisherman. (2023, October 19). Smarter nets and faster data for the Alaska pollock fishery.

<https://www.nationalfisherman.com/smarter-nets-and-faster-data-for-the-alaska-pollock-fishery>

<sup>55</sup>Yochum, N. (2022, May 26). Alaska Bycatch Review Task Force: Salmon Bycatch in the Bering Sea Pollock Fishery [PowerPoint slides]. Alaska Department of Fish and Game.

[https://www.adfg.alaska.gov/static/fishing/PDFs/bycatchtaskforce/052622\\_yochum\\_ak\\_bycatch\\_task\\_force.pdf](https://www.adfg.alaska.gov/static/fishing/PDFs/bycatchtaskforce/052622_yochum_ak_bycatch_task_force.pdf)

<sup>56</sup>National Fisherman. (2024, January 9). New genetic data fuels debate over Bering Sea salmon bycatch.

<https://www.nationalfisherman.com/alaska/new-genetic-data-fuels-debate-over-bering-sea-salmon-bycatch>

Thank you for the opportunity to comment.

Sincerely,

Handwritten signature of Linda Behnken in cursive script.

Linda Behnken  
Executive Director

Handwritten signature of Emily Scott in cursive script.

Emily Scott  
Outreach Director



## ALASKA MARINE COMMUNITY COALITION

**March 2, 2026**

Alaska Board of Fisheries  
c/o Alaska Department of Fish and Game, Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Support for Proposals 163–165 and a practical pathway for enforceable pelagic trawl standards in Alaska state waters**

Chair and Members of the Board,

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment on Proposals 163–165.

AMCC is a fishermen-founded and led organization made up of harvesters, community members, scientists, and conservation-minded Alaskans. We are pro-fishing. We support sustainable harvests that sustain working waterfronts and locally owned seafood businesses. We also support clear, enforceable rules. Durable fisheries depend on public confidence that management standards are real, verifiable, and applied fairly across gear types.

AMCC supports the core concepts in Proposals 163–165. Together, they present an opportunity to strengthen accountability in state waters while maintaining a viable harvest.

### Enforceable Standards in State Waters

Alaska regulation already defines pelagic trawl gear in state waters as gear that does not contact the seafloor. The challenge before the Board is not definitional; it is operational. A standard that cannot be verified on the water invites confusion, dispute, and erosion of trust.

We encourage the Board to adopt a clear, enforceable performance expectation: if trawl gear is authorized as pelagic in state waters, it must operate off-bottom in a manner that can be demonstrated and verified.

This is not a departure from Alaska's management philosophy. It is consistent with the expectation that permit holders are responsible for operating legally at all times, particularly where compliance depends on how gear is fished rather than how it is constructed.

Clear definitions and verifiable compliance protect responsible operators, reduce user conflict, and create stability. Enforceable rules and sustainable harvest are not in conflict; accountability is a foundation for long-term access.

### Proposal 163: Keep Pelagic Meaningful

Proposal 163 reinforces the principle that pelagic authorization must reflect off-bottom operation in practice, not just design. AMCC supports the Board adopting an approach that ensures pelagic designation in state waters is distinct from bottom trawling in measurable terms. The goal is to ensure the regulatory standard has a practical effect.

### Proposal 164: Verification That Works

Proposal 164 provides the pathway to make the existing pelagic definition enforceable. The most important outcome is a monitoring and documentation framework that can support compliance verification.

AMCC recommends the Board direct development of a framework that includes:

- A clear operational performance standard defining off-bottom expectation
- A verification approach that is auditable and enforcement-ready
- A phased implementation timeline focused first on state waters, where the distinction between pelagic and non-pelagic trawl is explicit

Phasing requirements allows for practical adaptation while delivering measurable progress. A defined on-ramp gives industry time to plan while providing the public confidence that standards are being implemented.

Concerns about cost should be addressed through practical design and external funding opportunities. Routine compliance costs are a normal condition of access to public fisheries. Capital adaptation costs can be supported through programs such as NOAA's Bycatch Reduction Engineering Program, Saltonstall-Kennedy grants, and other innovation pathways.

### Proposal 165: Salmon Excluders as Best Practice

AMCC supports Proposal 165 requiring salmon excluders in pelagic trawl nets operating in state waters. Alaska is not starting from scratch. Gulf of Alaska research in 2013–2014 demonstrated feasibility and provides a foundation for implementation. State waters should not become an accountability gap that lags behind demonstrated bycatch reduction practices.

We recommend adoption with a one-season phase-in to support procurement and installation, followed by full implementation. This balances operational reality with measurable progress in reducing salmon bycatch risk.

## Leadership and Process

We ask the Board to assert clear direction: enforceable standards, practical implementation, and a defined timeline. Alaska should lead in Alaska waters while coordinating with federal processes where appropriate. Coordination should not mean deferral to federal management.

The Board's role is to establish baseline expectations. Clear standards reduce conflict and move discussion from identity-based arguments toward measurable compliance and problem-solving.

## Procedural Concern Regarding Proposal 186

AMCC also wishes to briefly raise a procedural concern regarding Proposal 186. Agenda Change Requests are intended to address unforeseen or imminent biological concerns requiring immediate action. Proposal 186 appears to involve permanent and allocative regulatory changes rather than an emergent conservation crisis.

Permanent allocation decisions are best evaluated in the regular cycle, where full public participation and a complete evidentiary record can inform deliberation. Maintaining a predictable process protects the Board's institutional integrity and ensures durable outcomes.

Thank you for your service to Alaska's fisheries and fishing communities. AMCC appreciates the opportunity to contribute to a practical pathway that strengthens accountability while sustaining harvest in state waters.

Respectfully submitted,  
Alaska Marine Community Coalition

*Michelle Stratton*

Michelle Stratton  
Executive Director



Jamie O'Connor  
Deputy Executive Director

**Submitted by:** Rod Arno

Alaska Outdoor Council

**Community of Residence:** Palmer

Alaska Outdoor Council represents thousands of Alaskans who depend on a wild food source of fish.

Conservation of the resource is the Alaska Outdoor Council's number one purpose. Next is providing that there is a sustainable food source managed on sustain yield to ensure that food source remains available for the future.

Clearly, there's enough scientific data available to raise concerns about over populating the north Pacific with salmon hatchery fish released from Alaskan hatchery. A reduction of salmon hatchery releases in the north Pacific would be the correct action for the board to take during times of low abundance of Chinook and silver salmon.

Also, during times of low abundance of Chinook and silver salmon, halibut, rockfish it's time to clearly restrict the troller fleet and state waters

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## Alaska PNP Enhancement Group

### Board of Fisheries Statewide Meeting

March 17-21, 2026  
Anchorage, Alaska

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
Email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

### **RE: Opposition to Proposals 170, 171, & 172**

Dear Chair Carlson-Van Dort and Board of Fish Members:

These three proposals have been extensively addressed at previous board meetings (170), or at non-regulation but administrative meetings (171) or by agreement with the Commissioner of ADF&G (172).

***PROPOSAL 170 – 5 AAC 40.XXX*** Require new regulation to 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

This proposal is predicated on several untruths and relies heavily on speculative correlation from a single journal article alluded to in their narrative, rather than on empirical science. Evidence to the contrary was presented and debated at three recent meetings – January 2025 in Ketchikan, December 2024 in Cordova, and March 2024 for the Upper Cook Inlet. We will therefore present much of the same evidence in our public comments attached to this public comment. First, we will take Proposal 170 as written to correct and/or address their narrative as presented.

The proposal’s statement that there was “no annual Board oversight on hatcheries between 1974 and 1999”, is patently untrue. The Board of Fish (BOF) held numerous meetings during this period to authorize PNP program wild egg takes on dozens of wild stock streams from Ketchikan to Cordova to Kodiak. As previously noted, obtaining broodstock in the 1970s, at the nadir of statewide salmon declines, was considered allocative and therefore fell under the BOF's primary authority (AS 16.10.440(b)) “... the source and number of salmon eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest.”

Broodstock is no longer obtained from wild salmon streams unless there is a new program established. For a historical and legal perspective please see public comments by John Sund.



Broodstock collected from wild streams had to be managed carefully by ADF&G, as guided by the Board. Escapement goals had to be met first, and potential fish for broodstock needed to be surplus to the Biological Escapement Goals (BEG) or Optimum Escapement Goals (OEG). This effectively meant that fish used for broodstock would be potentially reallocated from commercial or sport fish harvests. These two issues – wild eggs and harvest allocation – fall within the Board's authority and therefore came before the Board on a regular basis.

During this same period (1974-1999), numerous terminal harvest areas came before the Board for adoption. Linked to this were allocation plans adopted into regulation by the Board for Southeast Alaska in 1994 and Prince William Sound in 1997 (modified and readopted in 2006). The Board was a fundamental component in the evolution of the PNP program from the 1970s until now.

The Hatchery-Wild Interaction research program was initiated in 2011 with an established science panel governing and directing the hypotheses, scope of work, budget, grants, and public facing meetings. Annual research reviews and updates were often scheduled temporally adjacent to Board of Fish meetings, with invitations extended to board members. These research reviews and meetings continue to this day and have always been publicly noticed and open.

The proposer's statement that "for most of the 49 years of the PNP hatchery program there was no public review or Board of Fish oversight" is false. The Board of Fish has received presentations from the department outlining the public process and dates of many of these public meetings. Regional Planning Team meetings and PNP board meetings have been publicly noticed from inception and have numbered in the hundreds over nearly five decades. Blatant inaccuracies of this magnitude should merit the proposal disqualifying in itself.

Proposal 170's concluding paragraph states verbatim "We conducted a global literature search of peer-reviewed publications (1970-2021) evaluating how hatchery salmonids affected wild salmonids, ...." This language is clearly from the title of the McMillan paper (2023)<sup>1</sup> which we critiqued and provided to the board two years ago and will do so again.

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<sup>1</sup> McMillan J., et.al. 2023. A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids

In brief, this synthesis is based primarily on journal articles from the Pacific Northwest. We agree that in many cases the hatchery programs of Washington, Oregon, and California have not and cannot replace salmon populations loss due to several major extant conditions:

1. hydroelectric dams that eradicated the majority of spawning and rearing habitat for salmon,
2. water withdrawal for agriculture and industrial uses, and
3. human encroachment and habitat conversion from wild to urban/ suburban uses, among a host of other degradations.

Alaska's enhancement program has little commonality with the PNW. Alaska's sport fish hatcheries have more in common with PNW hatcheries in terms of captive breeding, out-planting in barren lakes, hatchery releases in freshwater which commingle and at times spawn with wildstock Chinook, as well as supplementation of wild coho and Chinook.

Nowhere in the proposal is there a justification or analysis of how the 25% reduction was arrived at or what outcome is expected. As stated, the previous Board of Fisheries meetings it is simply arbitrary and capricious. Based on the proposer's own words, their lack of rationale, and scientific justification, Proposal 170 should be rejected.

An **addendum** is attached addressing the proposer's suppositions over the past several board cycles.

**PROPOSAL 171 – 5 AAC 40. XXX** Requires a new regulation or management plan to reduce straying of Prince William Sound pink salmon into Lower Cook Inlet.

The Alaska PNP Enhancement Group is also concerned about hatchery pink salmon straying. This concern was the primary reason for our group's creation of the Hatchery-Wild Interaction study and its governing science panel in 2011.

It is well established in scientific literature that salmon straying is a survival mechanism that buffers against changing environments, therefore fundamentally part of salmon's DNA. If salmon did not stray, they would not have re-colonized Alaska after the last major glacial retreat 15,000 years ago. Wild pink salmon are well known to have the lowest fidelity of *Oncorhynchus spp.* to their wild natal stream or hatchery release site. The Wild Salmon Center estimates that the wild pink salmon stray rate is up to 10%<sup>2</sup>. Alaska wild and hatchery pinks are expected to show a similar rate of straying from the hatchery or natal spawning grounds. Smolt species such

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<sup>2</sup> Wild Salmon Center, <https://wildsalmoncenter.org/salmon-species/pink-salmon/>. Portland, Oregon

as sockeye, coho, and Chinook spend from one to three years in freshwater and have relatively low stray rates compared to pink and chum salmon. Coho show high fidelity stream of origin and in one study by Westley et al.<sup>3</sup> found a stray rate of (0.08%–0.94%). In a twenty-year monitoring program, NSRAA found coho stray rates of less than 2%. Additional work determining precise wild pink salmon stray rates for PWS should be the next phase of the Hatchery-Wild research program. Much of the raw data has been collected during the hatchery pink reproductive success research.

Given this knowledge, when the Alaska enhancement program was statutorily created in the mid-1970s, it was anticipated that hatchery salmon would also stray. Specific regulations were promulgated considering this understanding, including use of local broodstocks, imprinting protocols, and aggressive terminal harvest fisheries to reduce the potential for wandering fish. Knutsen et al.<sup>4</sup> documented that 94% to 99% of enhanced pink salmon are harvested in mixed stock and terminal fisheries, reducing potential for straying. Despite these measures, hatchery pinks driven by their DNA, stray to a higher degree than desired. In a sense we are battling tens of thousands of years of genetics. This ongoing issue continues to be a focus of our research and management efforts.

The Alaska Hatchery-Wild research shows that while hatchery salmon may influence wild salmon, this effect may be short-lived. Hybrid crosses between hatchery and wild salmon have been shown to reduce reproductive success in the first generation, with a relative reproductive success (RRS) of approximately 0.5, or half as successful as a wild x wild cross.

Recent reporting by Shedd et al. (2026)<sup>5</sup> found that second generation RRS improved to 0.84, or 84% of a wild x wild cross. Third generation cohorts have not been analyzed yet but given the marked improvement in RRS from the first to second generations, differences in RRS are likely to disappear over time. Several Board of Fish cycles ago the department's report to the Board of Fisheries indicate that broad-scale genetic groups have not identified genetic drift in Prince

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<sup>3</sup> Westley P., et al. 2013. Rates of straying by hatchery-produced Pacific salmon (*Oncorhynchus* spp.) and steelhead (*Oncorhynchus mykiss*) differ among species, life history types, and populations

<sup>4</sup> Knutsen, et al. 2021 Hatchery-Origin Stray Rates and Total Run Characteristics for Pink Salmon and Chum Salmon Returning to Prince William Sound, Alaska, in 2013–2015

<sup>5</sup> Shedd, K., King, E., Gruenthal, K., Adkison, M., Wilson, L., Wesley, P., May, S., and Rand, P. 2026. Second generation fitness consequences of Pink Salmon hatchery-origin strays in Prince William Sound

William Sound. However, even if the reproductive success effect were to disappear, we do not suggest straying should be ignored.

Hatchery strays, even if benign, represent a loss to fishermen and the PNP program in terms of harvest and value. Commercial and sport fishing whether on the ocean or in freshwater have effects on salmon, such as size selection, timing of freshwater entry, spawner size, and abundance. Rather than ceasing fisheries, we are compelled to conduct further research, collect data, and implement mitigate measures using the best available science. Program integrity, whether the oil industry, sport charter tourism, aquaculture or any other sector, should be founded on the precautionary principle, problem identification, and the application of corrective measures when known and feasible.

To truly reduce hatchery salmon straying, the continuation and expansion of the burgeoning research program underway in Alaska is essential. Ten years ago, Northern Southeast Regional Aquaculture Association (NSRAA) in Sitka began collaborating with a mariculture group from California to raise seaweed and kelp at salmon release sites, with the goal of studying the effect of mariculture on salmon health and homing fidelity. Unfortunately, the company did not follow through on this initiative. More recently, progress has been made with research on the use of kelp amino acids and their impact on salmon homing behavior. The PNPs are now working with the University of Alaska Southeast and the Sitka Sound Science Center (SSSC) to conduct this research at several sites.

The Sheldon Jackson hatchery in Sitka is working with pink salmon, testing the effect of amino acid scent from split kelp on natal site fidelity. Similarly, an NSRAA facility near Sitka is conducting a parallel experiment with chum salmon, using a robust experimental design with Dissolved Free Amino Acid (DFAA) from a species of seaweed known as split kelp. Baseline groups will not have exposure to DFAA, while DFAA exposure groups will be tested to assess and compare homing fidelity.



Figure 1. PNP facilities that participated in the initial Integrated Multi-trophic Aquaculture assessment<sup>6</sup>

This ongoing research at the PNP hatcheries represents a critical step in addressing the challenge of hatchery salmon straying. By leveraging partnerships and employing rigorous experimental methods, the industry is proactively working to identify effective solutions to maintain the integrity of both hatchery and wild salmon populations.

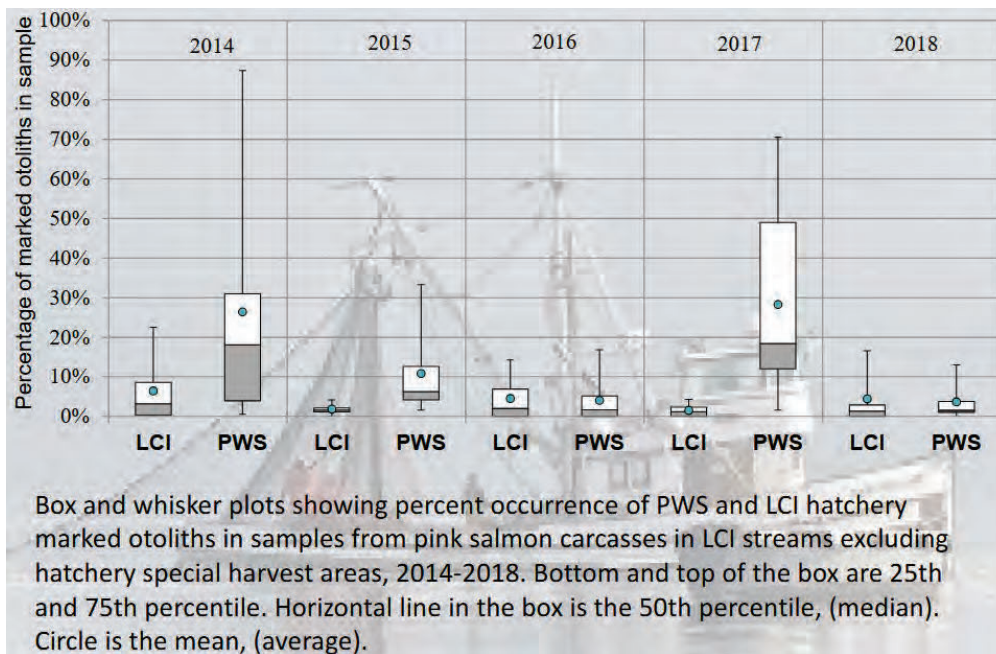


Figure 2. PWS stray proportions in LCI streams, 2014-2018, ADFG Otis & Hollowell 2019<sup>7</sup>

<sup>6</sup> Bowers, A., & Wilson, T. 2025. Determining site suitability and processing potential at Alaska’s salmon hatchery release sites for the integration of mariculture species. ABEC MIRF Project Final report.

<sup>7</sup> Otis, T. & Hollowell

**PROPOSAL 172 – 5 AAC 40.XXX** Require new regulation for a moratorium on pink and chum hatchery production

As of 2019, there was a de facto PNP salmon production moratorium based on an agreement with the Commissioner of Fish and Game. Since that agreement, no new pink or chum salmon egg permits have been requested or issued. The Commissioner has the responsibility and authority to permit, rescind a permit, or decrease a PNP permit.

To usurp the Commissioner's authority under the guise of a Board of Fish 'finding' there is no guarantee that it will have greater longevity. The argument posited for such action is that commissioners come and go. While true, any Board of Fish can change what a previous board has set in regulation. The history of board members shows quite clearly that the Commissioner of Fish and Game changes far less frequently than the board. Every time there is a new board member, it effectively becomes a new board, changing every year or two. There is far more consistency with commissioners and permitting hatchery eggs remains under their authority.

**Proposal 172** lists **four** potential elements for a moratorium, all of which are in effect today or are being addressed.

1. **Resolution of uncertainty of hatchery-wild effects.** Research initiated by the PNPs in 2011 aimed to shed light on the effects of hatchery strays on wild stocks. This ongoing research has provided valuable insights into reproductive success of pink and chum salmon. As hypothesized in the 2011 study, the F1 generation showed significantly lower relative reproductive success (RRS), approximately 0.5 or half as successful as wild pinks.

The F2 generation of pinks demonstrated improvement, with 0.85 RRS in the odd-year lineage and 0.73 RRS in the even-year lineage. This suggests that the effects of hatchery strays diminish over subsequent generations, as hybrid crosses recover their reproductive capacity. Future work with F3 generations is likely to show further improvement.

Previous BOF presentations by the department show significant genetic differences in odd and even year pink salmon heterogeneity, but little difference among odd year or even year lineages. Also there appears to be little genetic drift within Prince William Sound (PWS) pink salmon stock groups (even and odd years) after 45 years of enhancement, while at the same time wild pink salmon productivity has increased over the past 35 years. Lower Cook Inlet (LCI) pinks are a geographically adjacent stock group with similar genetic characteristics to PWS. This is partially driven by the fact that Gulf of Alaska pink salmon (PWS and Cook Inlet) were pushed south during the last glacial maximum 15,000 years ago. Whereas pink stocks on the Bering Sea side of the Alaska Peninsula were isolated and are a distinct stock group.

PWS strays in LCI ranged from 3% to 29% in the sampled streams as reported in the 2014-2018 Lower Cook Inlet (LCI) study with three of the five years stray proportion in recipient streams averaged less than 10%. This is similar to the Hatchery-Wild research project as reported above.

Experimentation and research are underway to reduce straying by using Integrated Multi-trophic Aquaculture (IMTA) and Dissolved Free Amino Acids (DFAA). Focused research with split kelp amino acids is being conducted at the Sitka Sound Science Center and NSRAA's Crawfish Inlet project. If proven successful, this technique would be widely introduced to all PNP programs. Since the inception of Alaska's enhancement program, applied research has been consistently pursued to improve program effectiveness, reduce wild stock interactions, and improve environmental quality.

From its inception, Alaska PNPs' long-term, collaborative research approach has been instrumental in developing a deeper understanding of the complex interactions between hatchery and wild salmon populations. The expectation is that these research results will help inform management strategies to mitigate the impacts of hatchery strays and maintain the integrity of wild salmon stocks. Using local wild stocks for

hatchery brood development is a fundamental tenet of the program to minimize genetic effects.

2. **Comprehensive hatchery policy guidelines.** Currently, there are comprehensive enhancement guidelines including policies for genetics, pathology, transport of fish, stocking guidelines, otolith marking, comprehensive salmon planning, broodstock and siting policies. As new information is learned best management practices are adopted.
3. **Regional Comprehensive Plans.** Comprehensive salmon plans are currently available for each region. These plans are a PNP requirement and have been completed for Southeast, PWS, Kodiak, and Cook Inlet. Most of these regions have had one or more updates to their original comprehensive salmon plan. Again, RPT meetings are open to the public and are a statutorily guaranteed venue for public comment and debate.
4. **Results of any independent review.** The Alaska Hatchery Wild Interaction science panel<sup>8</sup> is comprised of twelve scientists from numerous disciplines and agencies including University of Alaska fishery scientists, NOAA fishery scientists, former Scripps Institute and USDA geneticists, as well as several ADF&G geneticists and scientists. Numerous peer reviewed journal articles have been published and available at ADF&G website. This group of scientists have guided the research hypotheses and review since 2011 which has cost over \$20 million, not including ADF&G in-kind contribution. There are two outside or independent organizations evaluating not only the Alaska hatchery program but Alaska fisheries management and polices – Marine Stewardship Council (MSC) and Certified Seafood International (CSI).

In conclusion, we agree with ADF&G's comments and justification for opposing Proposals 170, 171, & 172. The department's comments closely align with our argument and rationale laid out above in this public comment. Tying Chinook declines to pink salmon is not based in empirical science but rather

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<sup>8</sup> <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/hc/or3.pdf>



speculative correlation. Nevertheless, the author of Proposal 170 continues to rely on that speculation without any other supporting evidence. Therefore, we have attached an addendum that addresses their supposition with empirical studies and over a hundred references to delineate what is known about Chinook declines, pink salmon interactions, and climate driven environmental changes

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Thank you for this opportunity to comment. We look forward to working with the Board at the March statewide meeting.

Tessa Frost, Southern Southeast Regional Aquaculture Association (SSRAA)  
Scott Wagner, Northern Southeast Regional Aquaculture Association (NSRAA)  
Katie Harms, Douglas Island Pink and Chum (DIPAC)  
Mike Wells, Valdez Fisheries Development Association (VFDA)  
Geoff Clark, Prince William Sound Aquaculture Corporation (PWSAC)  
Tina Fairbanks, Kodiak Regional Aquaculture Association (KRAA)  
Dean Day, Cook Inlet Aquaculture Association (CIAA)

### **Addendum: Chinook and Pink Salmon Interactions Research**

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## Alaska PNP Enhancement Group

### Board of Fisheries Statewide Meeting March 2026

#### **Chinook and Pink Salmon Interactions Research - Executive Summary**

Defining why Chinook salmon stocks have been in a prolonged low-productivity phase is challenging, and isolating specific drivers is complex. Fortunately, significant research has been published, published in journals and synthesized. The State of Alaska produced a 264-page synthesis on Chinook salmon status (September 2024), that reviewed a dozen topic areas and incorporated hundreds of peer-reviewed studies in response to Wild Fish Conservancy's petition. NOAA Fisheries and ADF&G, at the request of Alaska's Congressional delegation, convened Alaskan scientists in a year-long effort resulting in a 100-page publication that describes salmon productivity trends, summarizes current knowledge, identifies critical gaps, and recommends prioritized research in *Alaska Salmon Research Task Force Report* (June 2024).

One clear point of consensus from the reviews is that many Alaska Chinook salmon populations are in a prolonged low-productivity cycle, with the Yukon and Kuskokwim River systems of greatest concern. Scientists have documented deleterious summer water temperatures in interior spawning areas — on the order of 18°C during July Chinook spawning — temperatures regarded as lethal for spawning Chinook.

This report to the Board of Fisheries is a compilation of the most current research available on factors affecting Chinook salmon health and productivity, some suggesting linkages to pink salmon, but most studies demonstrate declines having nothing to do with pink salmon. Fortunately, it is not all doom and gloom, Chinook are beginning to rebound in the Southeast end of the state.

**Is there a smoking gun?** There are several, in fact, but there are regional differences. The weight of empirical evidence assembled in recent assessments, document both lethal and sublethal effects on Chinook salmon across life stages, and point to multiple, interacting climate-driven mechanisms as proximate drivers of the current low-productivity phase. Marine perturbations — notably the 2016–2019 North Pacific/Bering Sea marine heat-wave — altered oceanographic conditions and prey fields in ways that reduced growth and survival of juveniles in early marine life. Concurrently, freshwater thermal regimes in many Interior spawning reaches, particularly within the Yukon and Kuskokwim drainages, have reached critically high levels during July spawning periods; such temperatures are

associated with increased adult and embryo mortality, reduced gamete viability, second generation effects, and other sublethal physiological stresses.

Permafrost thaw may be one of the most dramatic and ecologically significant changes occurring in the Interior where some 75 streams have been identified discharging orange plumes of deleterious dissolved iron, cadmium, aluminum, SO<sub>4</sub>:Cadmium, and characterized by very low pH from a hydration reaction yielding sulfuric acid. Fish, algae, zooplankton and insect populations have been negatively affected, and the release of the formerly sequestered heavy metals may be linked to the decline of regional chum and chinook salmon populations.

Phenological shifts further compound these effects. Earlier ice-out in the Bering Sea appears to modify the timing and magnitude of primary and secondary production, reducing prey availability at times critical for juvenile Chinook. Earlier smolt migration documented in some systems can produce a trophic mismatch between ocean entry and the spring zooplankton bloom, undermining early marine growth and survival. Consistent with these mechanistic links, a 2023 analysis of Yukon juvenile Chinook production attributed roughly 45% of interannual variability to river temperature or discharge conditions experienced during the parent spawning migration, highlighting the importance of freshwater conditions for subsequent cohort strength.

Predation and shifts in predator populations likely contribute materially to declines in Chinook productivity, size-at-age and age-at-return. Several apex predators that preferentially consume larger Chinook have increased in abundance in recent decades (in some assessments, resident killer whale numbers in portions of the northeast Pacific are estimated to have risen roughly threefold), with consumption estimates on the order of millions of Chinook annually (e.g., ~2.5 million for resident killer whales). Salmon sharks have also been estimated to consume large numbers of salmon (reported ranges ~12.6–25.2 million individuals per year). Recent telemetry and diet studies corroborate substantial salmon shark predation and demonstrate overlapping migratory timing and pathways between these predators and migrating Chinook, providing a clear mechanism for elevated mortality during migration and early marine residence. Because these predators preferentially remove larger individuals, increased predation pressure can drive reductions in mean size-at-age and shifts toward earlier return ages via both direct removals and selective pressure, which may operate synergistically with climate-driven stressors to depress cohort productivity. Pinniped populations have also increased dramatically and target juvenile Chinook and adults.

Collectively, these lines of evidence support a multi-factorial causation model rather than a single, universal “smoking gun.” The relative contribution of each mechanism likely varies among stocks and life stages and is mediated by local habitat, harvest, and trophic context. Alaska has experienced cyclical low productivity phases for millennia followed by recovery. However, Interior Alaska is seeing something quite different – a synergistic effect of excessive freshwater warming, release of sequestered heavy metals from melting permafrost, a warming Bering Sea, and increased predator fields.

This review does not find robust empirical support for hypotheses positing that pink salmon—particularly hatchery-origin pinks—are a driver of Chinook declines, as advanced by Ruggerone and others. In fact, evidence is weak to nonexistent. Available field studies of wild and hatchery pink salmon yield inconsistent results with respect to competitive impacts on Chinook at critical life stages, and regionally divergent return patterns undermine a simple, generalizable competition mechanism. For example, Southeast Alaska has experienced low Chinook returns throughout the past decade while pink returns in that region have also been low (reported >95% are wild pinks), a pattern inconsistent with hatchery-driven pink competition as the dominant cause of Chinook declines. In 2025, Southeast has seen partial rebounds in pink abundance in northern areas alongside recovery of several Chinook stocks: Unuk, Chickamin, and Chilkat Chinook were removed from “stock of concern” status in 2025, further indicating that local productivity dynamics and multi-factorial drivers (rather than a single, basin-wide pink–Chinook competition effect) better explain observed trends.

In Prince William Sound, since 1990 large pink salmon releases co-occur spatially and temporally with Copper River Chinook, yet the Copper River Chinook stock is not classified as a stock of concern. This stock continues to support substantial sport and commercial fisheries and consistently attains its spawner escapement goals (SEGs), demonstrating that high local pink production does not inevitably precipitate Chinook declines. The Copper River case therefore underscores the importance of regional context and stock-specific life-history, habitat, and fishery dynamics when evaluating hypothesized competitive effects of pink salmon on Chinook; it further cautions against broad generalizations.

This report represents a balanced synthesis of current research on Chinook salmon and pink salmon interactions. While scientific consensus is incomplete across all topics, a preponderance of evidence—drawn from NPAFC, NOAA Fisheries, International Year of the Salmon (IYS), ADF&G, and independent investigators—supports the multi-factorial interpretation of recent Chinook low productivity. Below is a concise, academically framed list of topic areas that this report addresses, each with a brief description of its relevance.

### Section Titles

1. Introduction: Status of Alaska Chinook Stocks, Are Pink Salmon the Problem? pg.4
2. Warming Climate and Effects on Alaska Chinook Salmon, pg.6
3. Trends in Size at Age, Age of Return, & Health/Condition Factors, pg.12
4. Apex Predators: Salmon Sharks, Killer Whales, and Pinnipeds pg.18
5. Marine Food Dynamics, pg.24
6. Marine Harvest, Interception, and Bycatch of Chinook Salmon, pg.28
7. Freshwater Habitat Changes, pg.31
8. Impact of Pink Salmon on Chinook and Ocean Carrying Capacity, pg.35
9. Conclusion, pg.47
10. Alaska 2025 Stocks of Concern, pg.48
11. Literature Cited, pg.49

### 1. Introduction: Status of Alaska Chinook Stocks, Are Pink Salmon the Problem?

Chinook salmon (*Oncorhynchus tshawytscha*) have long been a cornerstone of Alaska's cultural, economic, and ecological landscape. In the recent decade and a half, many-but not all- Chinook salmon populations across the state have declined, prompting concern among scientists, resource managers, and local communities alike.<sup>1</sup>

Alaska's Chinook salmon stocks exhibit considerable variation in their status across different regions, some populations have shown resilience or short-term increases, others have fallen dramatically. For instance, Schindler et al. (2013)<sup>2</sup> reported that Chinook salmon returns to Western Alaska rivers have decreased by an average of 45% since the early 2000's. The Alaska Department of Fish and Game (ADF&G) has documented persistent low abundance of adult returns in numerous Alaska stocks over

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<sup>1</sup> Alaska Department of Fish and Game. (2020). Chinook Salmon Stock Status and Research in Southeast Alaska. Technical Report

<sup>2</sup> Schindler, D., Krueger, C., Bisson, P., Bradford, M., Clark, B., Conitz, J., ... & Scheuerell, M. (2013). Arctic-Yukon-Kuskokwim Chinook salmon research action plan: Evidence of decline of Chinook salmon populations and recommendations for future research. Prepared for the AYK Sustainable Salmon Initiative, Anchorage, AK.

the past decade. As a result, the Board of Fisheries has adopted 'stock of concern' status for 15 stocks as of 2025.<sup>3</sup> (see page 36)

Some areas, such as portions of Southcentral Alaska (Copper River), have shown more stability or even modest increases in certain years.<sup>4</sup> In 2024, the board of fisheries delisted three southeast Alaska stocks - Chilkat, Unuk, and Chickamin. However, the overall trend across much of the state points to a concerning pattern of reduced productivity and abundance for Chinook salmon populations.

The causes of these declines are complex and multifaceted, involving an interplay of environmental changes, food web dynamics, apex predators, localized habitat degradation, fishing pressure, and broader ecosystem shifts. Climate change is implicated through altered ocean conditions, warmer freshwater temperatures during key life-stages, earlier ice-out, primary and secondary productivity timing in marine waters, and potential mismatches between smolt outmigration and plankton blooms (Munro 2019).<sup>5</sup>

This paper will present critical factors in Chinook productivity decline by providing empirical studies and research from NOAA Fisheries, the ADF&G Salmon Ocean Ecology Program, IYS, and North Pacific Rim journal articles. Pink salmon abundance will be one of the facets examined as a potential negative influence on Chinook abundance in Alaska. The information contained herein relies heavily, but not exclusively on NOAA Fisheries Alaska Salmon Task Force Report 2024 developed over a twelve-month period by a panel of Alaska salmon experts<sup>6</sup>, ADF&G Chinook Initiative 2013 & Chinook Symposium 2018<sup>7</sup>, ADF&G Factors that limit Chinook Salmon Productivity 2022<sup>8</sup>, and State of Alaska vs Wild Fish Conservancy letter to NOAA, 2024<sup>9</sup>.

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<sup>3</sup> ADFG Stocks of Concern Feb'25 <https://www.adfg.alaska.gov/index.cfm?adfg=specialstatus.akfishstocks>

<sup>4</sup> Cunningham, C. J., Westley, P. A. H., & Adkison, M. D. (2018) Signals of large-scale climate drivers, hatchery enhancement, and marine factors in Yukon River Chinook salmon survival revealed with a Bayesian life history model.

<sup>5</sup> Munro, A. R. (2019). Summary of Pacific salmon escapement goals in Alaska with a review of escapements from 2010 to 2018.

<sup>6</sup> <https://repository.library.noaa.gov/view/noaa/61603>

<sup>7</sup> <https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative.main>

<sup>8</sup> [https://www.adfg.alaska.gov/static/fishing/pdfs/research/gravelto gravel/chinookgravelto gravel\\_researchplan.pdf](https://www.adfg.alaska.gov/static/fishing/pdfs/research/gravelto gravel/chinookgravelto gravel_researchplan.pdf)

<sup>9</sup> State of Alaska letter September 6, 2024 Request for information, 90-Day Finding on a Petition to List Gulf of Alaska Chinook Salmon as Threatened or Endangered Under the Endangered Species Act.

[https://www.adfg.alaska.gov/static/home/news/hottopics/pdfs/soa\\_comment\\_letter\\_on\\_gulf\\_of\\_alaska\\_chinook\\_salmon\\_endangered\\_species\\_act\\_petition.pdf](https://www.adfg.alaska.gov/static/home/news/hottopics/pdfs/soa_comment_letter_on_gulf_of_alaska_chinook_salmon_endangered_species_act_petition.pdf)

The State of Alaska response document to the NOAA bureaucrats (not its Alaskan scientists) is a 264-page heavily documented and referenced compendium of the biology, science, and management of Chinook in Alaska. A salient passage quoting from the document:

“Increased abundance of pink salmon is a commonly posited mechanism for reduced growth and productivity in salmon (e.g., Buckner et al. 2023<sup>10</sup>, Ruggerone and Goetz 2004<sup>11</sup>). However, in the Gulf of Alaska, juvenile, immature, and maturing salmon growth and condition have been shown to be driven by bottom-up forces in the ocean, meaning that fluctuations in the primary productivity, not the abundance of other salmon species, would limit juvenile fish growth (Daly et al. 2019b)<sup>12</sup>. During 2012 and 2013, there was no bottleneck in the prey resource for pink, chum, and sockeye salmon (Daly et al. 2019a)<sup>13</sup>, demonstrating that these species **were not competing for resources with Chinook** salmon. During 2015–2016 when top-down pressures were thought to have controlled forage fish abundance in the northern Gulf of Alaska, the rearing area for many Alaska Chinook salmon populations (Larson et al. 2014)<sup>14</sup>, other salmon (including pink salmon) were not the suspected cause (Arimitsu et al. 2021)<sup>15</sup>.”

## 2. Warming Climate and Effects on Alaska Chinook Salmon

The warming climate has emerged as a critical factor influencing the productivity and survival of Alaska Chinook salmon. As global temperatures rise, both freshwater and marine ecosystems are experiencing significant changes that directly impact salmon throughout their life cycle.<sup>16</sup> However, effects are divergent especially in western Alaska as portrayed by Schoen et.al. (2023).<sup>17</sup>

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<sup>10</sup> Buckner, R., Beaudreau, A. H., Daly, E. A., Sturdevant, M. V., & Fergusson, E. A. (2023). Drivers of juvenile Chinook salmon growth and condition in the Gulf of Alaska

<sup>11</sup> Ruggerone, G. T., & Goetz, F. A. (2004). Survival of Puget Sound Chinook salmon (*Oncorhynchus tshawytscha*) in response to climate-induced competition with pink salmon (*Oncorhynchus gorbuscha*)

<sup>12</sup> Daly, E. A., Brodeur, R. D., & Auth, T. D. (2017). Anomalous ocean conditions in 2015: impacts on spring Chinook salmon and their prey field

<sup>13</sup> Daly, E. A., Benkwitt, C. E., Brodeur, R. D., Litz, M. N., & Copeman, L. A. (2010). Fatty acid profiles of juvenile salmon indicate prey selection strategies in coastal marine waters

<sup>14</sup> Larson, W. A., Seeb, L. W., Everett, M. V., Waples, R. K., Templin, W. D., & Seeb, J. E. (2014). Genotyping by sequencing resolves shallow population structure to inform conservation of Chinook salmon (*Oncorhynchus tshawytscha*)

<sup>15</sup> Arimitsu, M. L., Hobson, K. A., Webber, D. N., Piatt, J. F., Anson, A. L., Rojek, N. A., ... & McKinzie, M. K. (2021). Trophic pathways supporting juvenile salmon in the productive frontal zone of a glacial fjord.

<sup>16</sup> Alaska Salmon Research Task Force Report, 2024

<sup>17</sup> Schoen, E.R., Howard, K.G., Murphy, J.M., Schindler, D.E., Westley, P.A.H., and von Biela, V.R. (2023). Divergent responses of Western Alaska Salmon to a Changing Climate



Yukon River Chinook are now at record lows: average body size has declined by 6%, fecundity is down 15% and fish are spending less time at sea because they are maturing at younger ages. Yukon chum hit a new low escapement in 2021 but has recovered to its escapement goal range in 2024 and 2025. By contrast Bristol Bay sockeye salmon are at record abundance, although they are spending less time in freshwater and returning as adults at smaller sizes. Schoen et.al. (2023) attribute reduced abundance of Yukon River Chinook to warmer freshwater temperatures and lower river discharge during the adult spawner stage. Chinook elsewhere in the state are seeing similar body size and fecundity declines. Sockeye body size decline is attributed primarily to their own abundance and secondarily to the abundance of Asian chum and pinks.

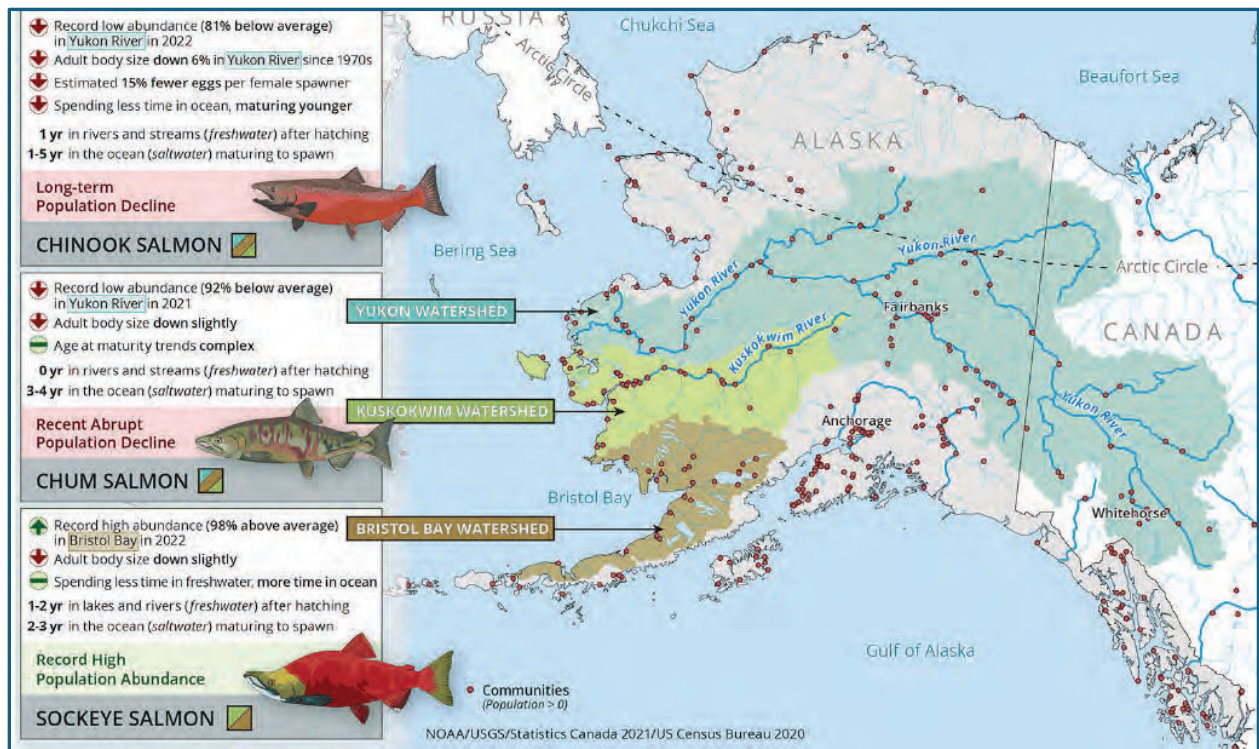


Figure 1. Contrasting trends in abundance and demographics of key salmon stocks in Western Alaska. Dots represent communities. Map and infographic credit: NOAA/Sarah Battle. Salmon illustrations credit: Katie Kobayashi. Figure from Schoen et.al. 2023

In freshwater habitats, increasing air temperatures are altering the thermal regimes of rivers and streams. As the land heats up, freshwater captures some of that heat. Fellman et.al. (2015)<sup>18</sup> found that warmer water temperatures in Southeast Alaska streams are leading to earlier fry emergence and

<sup>18</sup> Fellman, J. B., Hood, E., Dryer, W., & Pyare, S. (2015). Stream physical characteristics impact habitat quality for Pacific salmon in two temperate coastal watersheds.

smolt outmigration. While this might initially seem beneficial, it can lead to a mismatch between the timing of smolt entry into the ocean with the availability of key prey, potentially reducing early marine survival rates. Freshwater warming in interior Alaska is proceeding at more than twice (some science says 4 times) the rate of warming in the contiguous United States, exacerbating ecological change and physiological stresses.

Ocean warming compounds the problem and is also having profound effects on Chinook salmon. Cunningham et al. (2018)<sup>19</sup> linked higher sea surface temperatures in the Bering Sea and Gulf of Alaska to reduced survival rates for Yukon River Chinook salmon. Warmer Ocean temperatures alter the distribution and abundance of prey species, potentially leading to nutritional stress for salmon. In contrast to Chinook, a recent dissertation *Juvenile Salmon Spatial Ecology in the Eastern Bering Sea* by Hart (2023)<sup>20</sup> found that juvenile pink salmon may have higher survival associated with increased sea surface temperatures (SST). In earlier work by Farley et.al. (2016) states “warming temperatures in the eastern Bering Sea have led to shifts in the distribution and abundance of key prey species, which can negatively affect the growth and survival of juvenile salmon. For Chinook salmon, these changes in prey availability, coupled with increased metabolic demands due to warmer waters, can result in reduced body condition and lower survival rates.”<sup>21</sup> Taken together, these studies imply that broad climate-driven shifts in ocean and freshwater conditions—rather than direct competition with pink salmon—are more likely to disadvantage Chinook.

Morita et.al. (2019)<sup>22</sup> using long term monitoring data from the Eastern Bering Sea looked at condition factors, growth increments, maturity rates and competition among pink, chum, and sockeye salmon. They found strong, negative density-dependent relationships between chum and sockeye at high abundances, while correlations between pink salmon and the other two species were **weak and not statistically significant**. However, Morita et al. caution that pinks might exert top-down effects on zooplankton biomass that produce delayed density-dependent impacts, potentially reducing the growth of other salmon species later in the season and into the following year.

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<sup>19</sup> Cunningham, C. J., Westley, P. A. H., & Adkison, M. D. (2018). Signals of large scale climate drivers, hatchery enhancement, and marine factors in Yukon River Chinook salmon survival revealed with a Bayesian life history model.

<sup>20</sup> Hart, L., (2023). Model based estimation of juvenile salmon spatial ecology in the Eastern Bering Sea

<sup>21</sup> Farley, E. V., et al. (2016). Implications of a warming eastern Bering Sea for Bristol Bay sockeye salmon

<sup>22</sup> Morita, K., and Kukuwaka, M., (2019) Intra- and interspecific density-dependent growth and maturation of Pacific salmon in the Bering Sea.

Climate change is also reshaping precipitation patterns and glacial melt rates, which in turn affect river flows and water quality. Shanley et al.<sup>23</sup> projected that by the 2080s, many salmon-producing watersheds in Southeast Alaska will experience significant hydrological changes, including altered timing of peak flows and reduced summer low flows. These changes could impact spawning success and juvenile rearing habitat quality. The King Salmon River on Admiralty Island, the smallest ADF&G monitored population of Chinook in Alaska (BEG 120 – 240 spawners), is already experiencing hydrologic change: alpine glacier shrinkage has diminished flow and altered stream water thermal regimes, increasing risk to this vulnerable population.

Interior Alaska permafrost melting may be one of the most visually dramatic and ecologically significant changes occurring in the Arctic. Sullivan et.al (2025)<sup>24</sup> and O'Donnell et.al., (2024)<sup>25</sup> identified some 75 streams south of the Brooks Range that discharge large plumes of orange-rust colored water. These plumes contain elevated concentrations of dissolved iron, cadmium, aluminum, SO<sub>4</sub>:Cadmium, characterized by very low pH. Sulfate (SO<sub>4</sub><sup>-2</sup>) can be reduced and subsequently produce sulfuric acid, increasing acidity and mobilizing metals that were previously sequestered in permafrost. These naturally occurring contaminants now flow hundreds of miles to the ocean and exceed EPA thresholds by substantial multiples. Fish populations, algae, zooplankton and insects have been negatively affected and the authors suggest this phenomenon may be linked to the decline of regional chum and chinook salmon populations.



*Figure 2. An aerial view of the Kutuk River in Alaska's Gates of the Arctic National Park that looks like orange paint spilling into clear blue water (Ken Hill National Park Service). Some 75 rivers have been identified with similar conditions. Cadmium, iron, aluminum create color and extreme low pH.*

<sup>23</sup> Shanley, C. S., Pyare, S., Goldstein, M. I., Alaback, P. B., Albert, D. M., Beier, C. M., ... & Wipfli, M. S. (2015). Climate change implications in the northern coastal temperate rainforest of North America

<sup>24</sup> Sullivan P., Dial R., Cooper D., Diamond C., Tino C., Gregory D., and Lyons T. (2025) Wild, scenic, and toxic: Recent degradation of an iconic Arctic watershed with permafrost thaw.

<sup>25</sup> O'Donnell J. et al., (2024). Metal mobilization from thawing permafrost to aquatic ecosystems is driving rusting of Arctic streams.

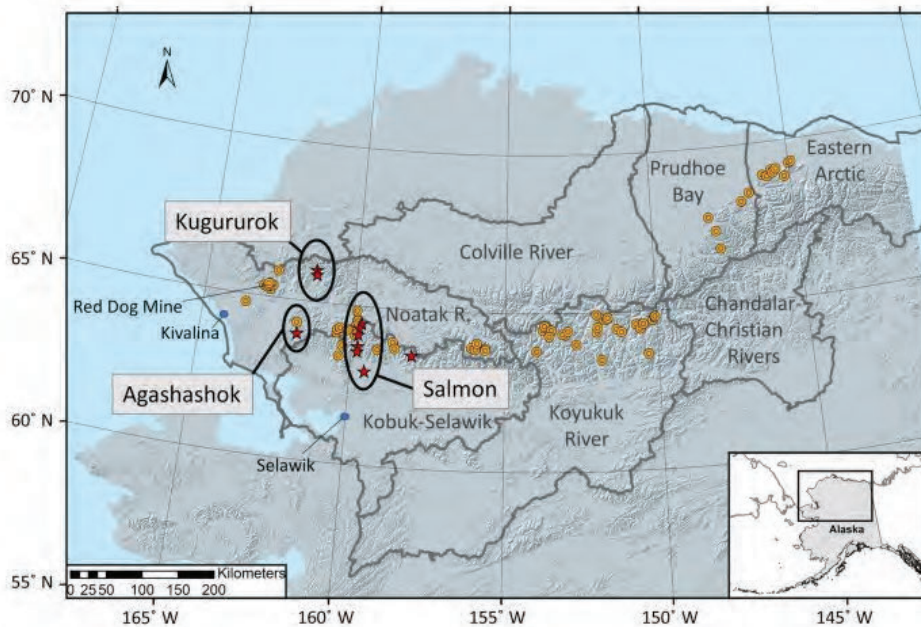


Figure 3. Orange circles indicate orange stream observations, red stars indicate sites where the water samples were collected, and blue circles are nearby villages. Hydrologic Unit Code-6 (HUC) basins are shown as black outlines from the National Watershed Boundary dataset. The hill-shade layer utilizes the USGS National Elevation Dataset. Map generated in Esri ArcMap software. Map credit: Kenneth Hill, NPS.

Together, these findings underscore that both changing biotic interactions and large-scale hydrological shifts driven by climate can indirectly and directly affect Chinook growth, survival, and productivity.

Increased freshwater and sea temperatures have been widely researched. Yasumiishi et.al. (2020)<sup>26</sup> investigated western Alaska Chinook production dynamics and found that summer growth decreased with increased sea temperatures in the north and southern Bering Sea, but growth increased with expanse of sea ice and a later ice retreat. Capelin (*Mallotus vilosus*) was identified as an important prey for juvenile Chinook especially during cold SST years. The long warming trend appears to

<sup>26</sup> Yasumiishi, E. M., Farley, E. V. Jr, Maselko, J., Aydin, K. Y., Kearney, K. A., Hermann, A. J., Ruggerone, G. T., Howard, K. G., and Strasburger, W. W. 2020. Differential north-south response of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) marine growth to ecosystem change in the eastern Bering Sea, 1974–2010

create conditions for lower quality prey, which reduces fitness and increases mortality over winter.<sup>27,28</sup>

Work with Chinook salmon in the Bering Sea and Pacific Ocean by Yasumiishi, Farley, Murphy and others complement Morita’s analyses of pink, chum, and sockeye interactions. Much of their research will be covered in following sections on Salmon Health, Marine Food Dynamics, and Pink Salmon Impact on Chinook.

Warming waters also facilitate the spread of and increased virulence of pathogens and parasites. Marcogliese et.al.<sup>29</sup> warned that higher temperatures could expand the range of certain fish diseases into previously cooler habitats, posing new threats to Chinook salmon populations. This threat is especially evident on the Yukon River, where infections by *Ichthyophonus sp.* are widespread and a significant concern for Chinook health and survival.<sup>30</sup>

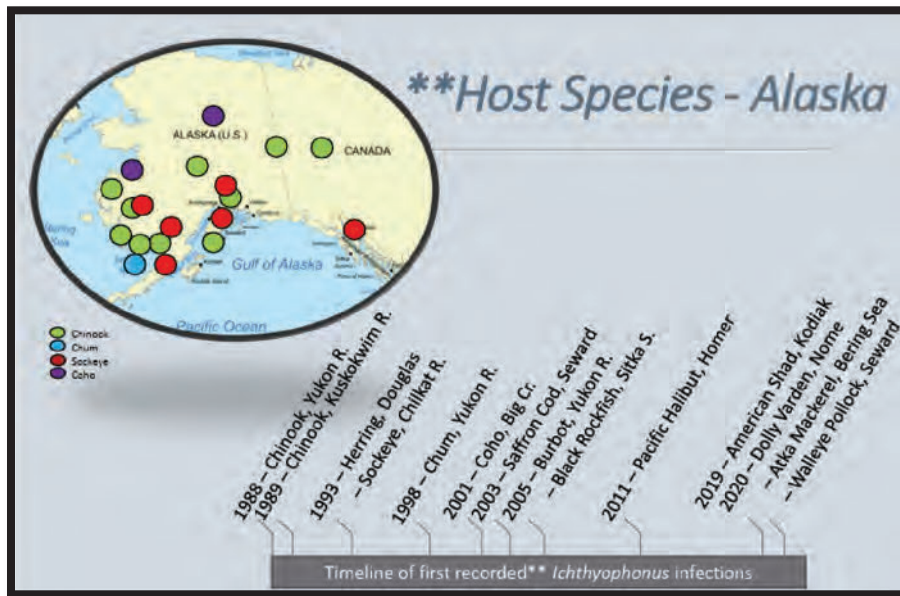


Figure 4. *Ichthyophonus* in Alaska by species and location which is primarily found in Chinook on the Yukon. *Ichthyophonus* was first identified in 1988 From ADF&G 2022

<sup>27</sup> Farley, E. V., Starovoytov, A., Naydenko, S., Heintz, R., Trudel, M., Guthrie, C., Eisner, L. R. et al. (2011). Implications of a warming eastern Bering Sea for Bristol Bay sockeye salmon

<sup>28</sup> Hunt, Jr, G. L., Coyle, K. O., Eisner, L. B., Farley, E. V., Heintz, R. A., Mueter, F., Napp, J. M et al. 2011. Climate impacts on eastern Bering Sea foodwebs: a synthesis of new data and an assessment of the Oscillating Control Hypothesis

<sup>29</sup> Marcogliese, D. J. (2008). The impact of climate change on the parasites and infectious diseases of aquatic animals. *Revue scientifique et technique* (International Office of Epizootics)

<sup>30</sup> Investigating the impacts of *Ichthyophonus* on Yukon River Chinook Salmon chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/ayk/Investigating%20the%20impacts%20of%20Ichthyophonus%20BOF%20Final.pdf

The effects of climate change on Alaska Chinook are interacting with other stressors—ocean acidification, warming events, and shifting food-web dynamics—to amplify risks to juvenile survival and long-term productivity. For example, Sigler et al. (2016)<sup>31</sup> found that ocean warming combined with acidification could lead to significant reductions in the quality and quantity of prey available, worsening the nutritional stress to juvenile salmon in the Gulf of Alaska.

In response to these challenges, there is an increasing focus on climate-resilient management strategies. Schindler et al.<sup>32</sup> emphasized the importance of maintaining diverse populations and habitats to buffer against climate-induced changes, a concept known as the "portfolio effect." Fortunately, most of Alaska has pristine habitat and the genetic diversity of Chinook remains intact and unchanged by human encroachment.

Mitigating the impacts of climate change will be difficult, short of geo-engineering or some global event that begins to shade the northern latitudes. Continued research and adaptive management strategies will be essential in navigating the challenges posed by a warming climate. An area of research that is somewhat lacking in the Arctic that needs to be addressed is near-shore ecological studies to assess smolt abundance, growth, and prey selection during the first two months of ocean life. Physiologically, this is a stressful time for osmoregulation, prey seeking, and predator avoidance. Studies of pink salmon have shown 50% to 90% mortality in the first forty-five days at sea. Chinook first two months at sea survival may be higher but is currently unknown.

### **3. Trends in Size at Age, Age of Return, and Health/Condition Factors**

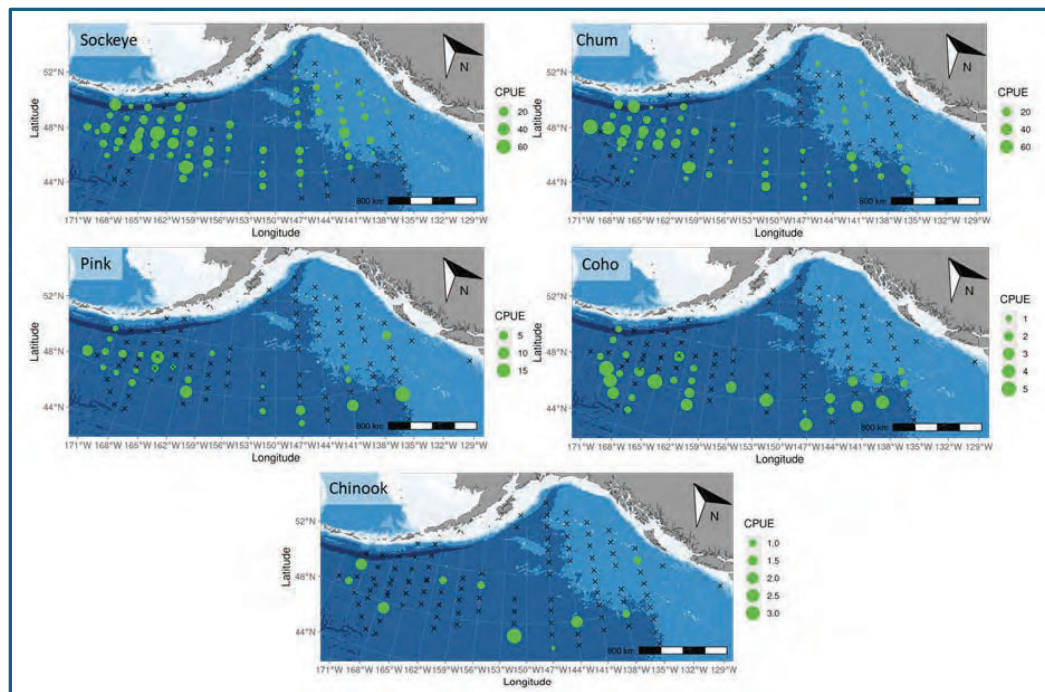
Recent multinational research—including programs led by the International Year of the Salmon (IYS) and NOAA Fisheries—has clarified spatial and temporal patterns in Chinook salmon health, age at maturity, and size-at-age across the North Pacific and Bering Sea. The IYS deployed large ocean-going research vessels staffed by international teams from Russia, Japan, Canada, Korea, and the United States to survey salmon during and after the 2015–2018 marine heatwave, producing a broad, coordinated snapshot of salmon condition and distribution during an extreme climatic event.

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<sup>31</sup> Sigler, M.F., Napp, J.M., Stabeno, P.J., Heintz, R.A., Lomas, M.W., Hunt Jr., G.L., 2016. Variation in annual production of copepods, euphausiids, and juvenile walleye pollock in the southeastern Bering Sea.

<sup>32</sup> Schindler, D. E., Hilborn, R., Chasco, B., Boatright, C. P., Quinn, T. P., Rogers, L. A., & Webster, M. S. (2010). Population diversity and the portfolio effect in an exploited species

Surface-trawl sampling conducted during the IYS Pan-Pacific Winter High Seas Expedition (2017–2022) measured lipid content, abundance, migratory pathways, and meso-zooplankton distribution, and demonstrated that health metrics vary spatially. Chinook sampled in the Gulf of Alaska generally exhibited lower energy densities than conspecifics in more westerly regions, a pattern consistent with regional differences in prey availability noted by Farley et.al. (2021)<sup>33</sup>. Pink salmon were frequently segregated from Chinook; in over half of the IYS samples pinks were absent where Chinook were present, although co-occurrence did occur in some locations. Weitkamp L. et.al. (2025)<sup>34</sup> summarize the IYS sampling protocols and 2022 results, including genetic stock assignments for 2,364 salmon and steelhead samples, which reveal marked geographic structuring: the eastern Gulf of Alaska catches were dominated by Southeast Alaska and British Columbia/Washington chum and Pacific Northwest even-year pink stocks, whereas western Gulf catches were dominated by Russian and Japanese chum and Asian pinks. Meso-zooplankton abundance peaked in the western Gulf, coinciding with high abundance of Bristol Bay sockeye and Asian chum and pink runs. (Figure 5-7).



.Figure 5. Maps showing the distribution and abundance of sockeye, chum, pink, coho, and Chinook salmon caught by trawls across the study area in 2022. Note different scales on each map” X indicates zero catch. From Weitkamp L., et.al. 2025. Sockeye were the most abundant species followed by chum salmon.

<sup>33</sup> Farley, E. V., Vestfals, C. D., Leroux, S. J., & Levine, R. M. (2021). Migratory corridors and feeding hotspots of postsmolt Chinook salmon in the eastern Bering Sea.

<sup>34</sup> Weitkamp L., Pakhomov E., Howard K., and Gilk-Baumer S, 2025. Internation Year of the Salmon Pan Pacific Expedition

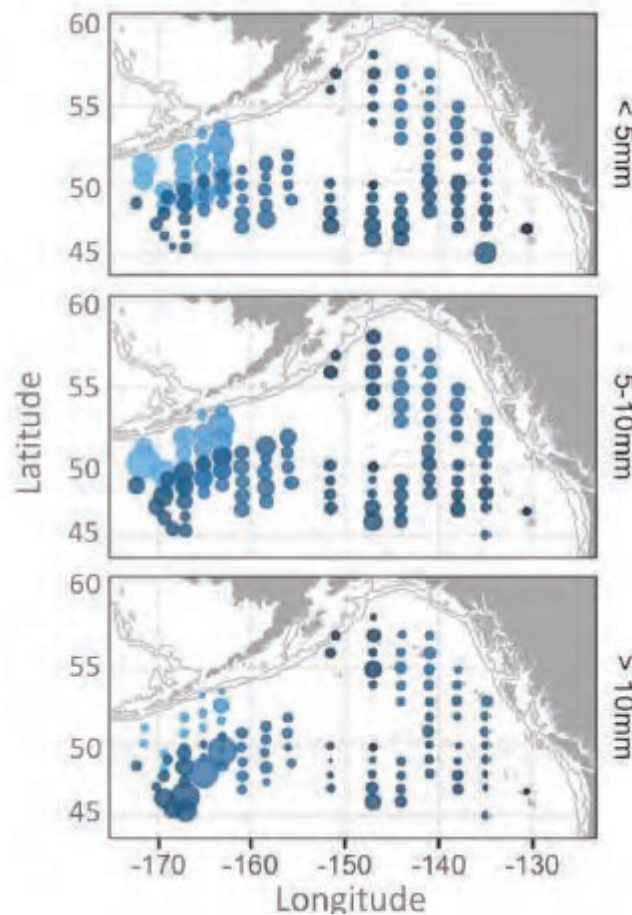


Figure 6. Distribution of meso-zooplankton size-binned biomass (dry weight in  $\text{mg m}^{-2}$ ) collected using bongo nets in the top 250-300 meters during winter 2022. Bubble size indicates biomass and bubble color indicates the day of year (DOY) that the sample was collected. From Weitkamp L. et.al. 2025

Studies of early marine ecology in western Alaska indicate that size at the end of the first summer at sea is a strong predictor of subsequent marine survival. Juvenile Chinook that attain larger size during this critical early marine period possess higher energy reserves, improved condition, and greater resilience to winter mortality and predation. Consequently, favorable ocean conditions and abundant, high-quality prey during the first months at sea are essential determinants of cohort strength. Factors that influence early marine growth—temperature, prey availability and composition, and timing of ocean entry—can have outsized impacts on overall productivity and therefore merit priority in monitoring and management. Chinook salmon’s first 2 months at sea are poorly understood. Interior Alaska chum and Chinook cohorts were among the hardest hit by the 2015–2018



heatwave; observations from the high-seas surveys foreshadowed poor chum returns to the Yukon in 2021.

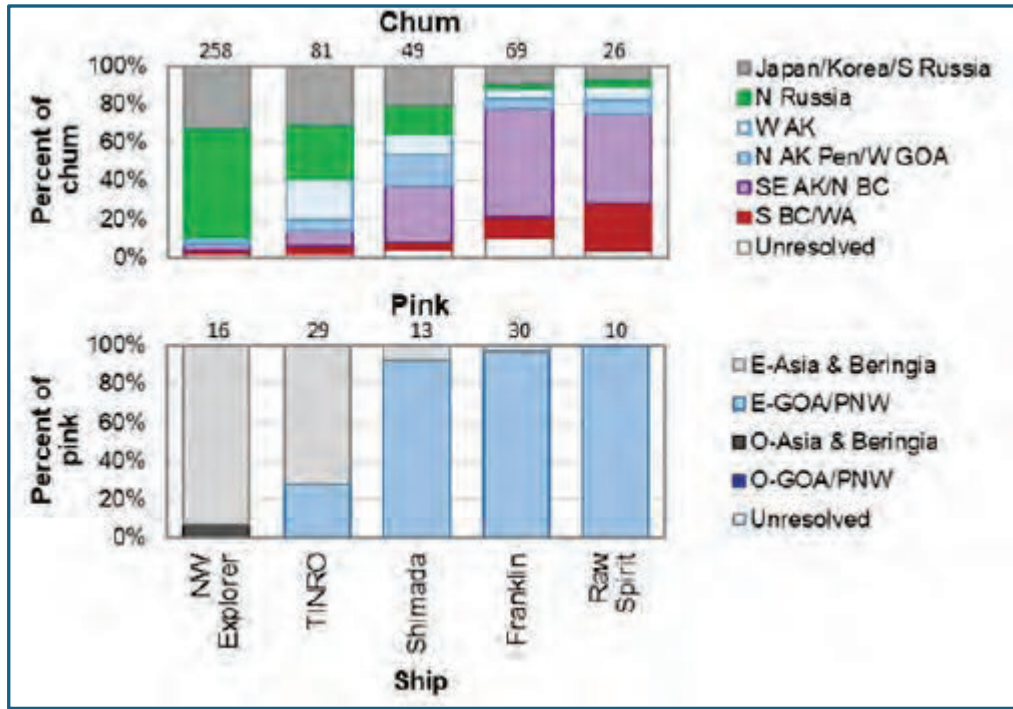


Figure 7. Genetic Stocks. Individual assignment results from the 2022 Pan Pacific Expedition to genetic stock identification reporting groups organized by species and ship. The number of salmon above each column is analyzed. Pink salmon stocks are separated between even (E) and odd (O) year groups. Abbreviations AK Alaska; BC British Columbia; WA Washington; SE Southeast Alaska; Pen Alaska Peninsula; GOA Gulf of Alaska; BB Bristol Bay; Kod Kodiak; Afog Afognak; PWS Prince William Sound; PNW Pacific Northwest. From Weitkamp L. et.al. 2025.

A consistent and concerning theme in recent work is a widespread decline in age at maturity and size-at-age for Chinook salmon. Ohlberger et. al. (2018)<sup>35</sup> documented significant declines across Alaska over the past four decades, with reductions in length-at-age of roughly 10% in some populations. Complementing this, the Ocean Salmon Ecology Program and agency collaborators

<sup>35</sup> Ohlberger, J., Ward, E. J., Schindler, D. E., & Lewis, B. (2018). Demographic changes in Chinook salmon across the Northeast Pacific Ocean. Fish and Fisheries

have reported declines in the average weight of mature Chinook returning to Alaskan rivers—up to approximately 25% since the 1980s in some systems<sup>36</sup>. Siegel et al. (2017)<sup>37</sup> documented a pronounced demographic shift in the Copper River, where the proportion of 4-year-old returns rose from about 15% in the 1980s to over 50% in recent years, accompanied by a corresponding decline in older, larger spawners; four-year-olds show the most consistent declines in size, whereas two-ocean fish generally do not.

Multiple, interacting hypotheses have been advanced to explain these trends. Ocean warming and altered prey communities may accelerate early growth yet trigger earlier maturation at smaller sizes; Lewis et al.<sup>38</sup> present evidence that warmer early marine temperatures can prompt faster juvenile growth and thus earlier maturation. Shifts in forage availability—such as variability in age-0 pollock—can alter juvenile growth trajectories through both competition and direct predation, as reported by Murphy et al.,<sup>39</sup> who link changes in Bering Sea prey communities to Chinook condition and maturation timing.

Freshwater conditions also appear consequential: Feddern et al. (2024)<sup>40</sup> examined 25 Yukon–Kuskokwim Chinook populations and found that reduced productivity correlated with a suite of marine and riverine factors, including smaller spawner size, colder winter SSTs, warmer first-year SSTs, above-average fall peak streamflows, increased sea ice during smolt outmigration, and higher abundance of marine competitors. These results underscore how oceanic and riverine drivers, acting at different life stages, can combine to depress cohort strength.

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<sup>36</sup> Howard, K. G., Catalano, M. J., Barclay, A. W., & Siddon, E. C. (2020). Changing size and age at maturity of Chinook Salmon *Oncorhynchus tshawytscha* in Alaska

<sup>37</sup> Siegel, J. E., McPhee, M. V., & Adkison, M. D. (2017). Evidence that marine temperatures influence growth and maturation of Western Alaskan Chinook salmon

<sup>38</sup> Lewis, B., Grant, W. S., Brenner, R. E., & Hamazaki, T. (2015). Changes in size and age of Chinook salmon *Oncorhynchus tshawytscha* returning to Alaska

<sup>39</sup> Murphy J., et.al. (2021). Northern Bering Sea surface trawl and ecosystem survey cruise report, 2019.

<sup>40</sup> Feddern, M., R. Shaftel, E. Schoen, et al. 2024. “Body Size and Early Marine Conditions Drive Changes in Chinook Salmon Productivity Across Northern Latitude Ecosystems.”

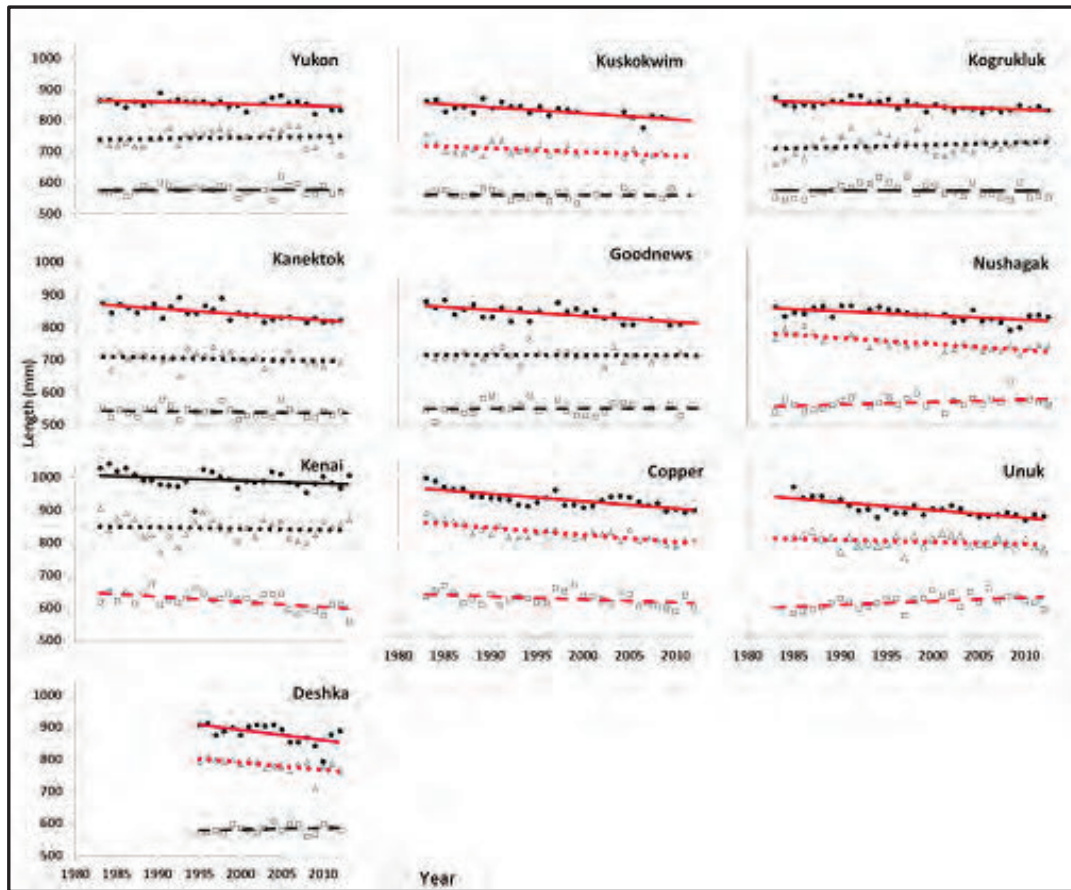


Figure 8. Linear regression of mean annual length (mm) Chinook salmon by stock, age class, and year. Closed circles ● and solid line \_\_\_ = 4-ocean, triangles ▲ and dotted line ..... = 3-ocean, open square □ and dashed line ... = 2-ocean. Red lines \_\_\_ indicate slopes significantly different from zero ( $P < 0.05$ ) Lewis et.al. (2015). Representative Chinook stocks from across Alaska. Top line in each graph is 4-ocean Chinook from 1980 to 2014, all of which show a decline in size. 3-ocean Chinook show mixed trends, whereas the lowest line, 2-ocean Chinook show little change in size over the same period.

Ruggerone and Connors<sup>41</sup> modeled relationships between pink salmon abundance and Chinook productivity and raised concerns that large pink cohorts, particularly when bolstered by hatchery production in odd years, might modify prey fields or impose density dependence that affects Chinook growth and maturation. However, these model-based hypotheses have been contested by more regionally focused empirical studies and do not align with geographic patterns of pink production—

<sup>41</sup> Ruggerone, G. T., & Connors, B. M. (2015). Productivity and life history of sockeye salmon in relation to competition with pink and sockeye salmon in the North Pacific Ocean

for example, the Eastern Bering Sea produces relatively few pinks compared with the Western Bering Sea and Russian Far East. (see fig.17, pg. 40).

Empirical research increasingly applies advanced tools—high-resolution oceanography, telemetry, acoustics, genomics, environmental DNA (eDNA), and satellite/archival tagging—to resolve how changing ocean conditions, prey communities, and predator dynamics jointly shape Chinook growth, survival, and life-history trajectories. Early results from these approaches emphasize spatially explicit variation in condition, diet, and migration pathways, and they highlight the importance of integrating predator dynamics with oceanographic and prey-base studies in stock assessments and management frameworks.

In synthesis, declines in age at maturity and size-at-age are reducing productivity and resilience across Chinook populations and complicating recovery efforts. The prevailing evidence points to multiple, interacting drivers—**extreme marine heating, altered prey fields, predator interactions, and freshwater stressors**—rather than a single dominant cause. While competition from pink salmon may influence local dynamics in some regions, the balance of regional studies indicates that extreme marine conditions together with freshwater factors are principal contributors to the observed declines. Continued integration of long-term monitoring with advanced observational technologies is critical to disentangle mechanisms and to inform adaptive management.

#### 4. Apex Predators: Salmon Sharks, Killer Whales, and Pinnipeds

Predation plays a major role in Chinook salmon survival and population dynamics throughout their life cycle.<sup>42,43,44</sup> The "critical size and period" hypothesis holds that growth and condition in the initial marine months strongly determine cohort survival: fish that reach a larger size by the end of their first summer have higher overwinter survival and greater chances of maturing. While mortality rates typically decline after that first winter at sea, mounting evidence shows that changing predator dynamics can significantly alter which fish survive to return as spawners. Recent research highlights the role of apex predators, particularly salmon sharks (*Lamna ditropis*) and killer whales (*Orcinus orca*).

<sup>42</sup> Sturdevant, M. V., Orsi, J. A., & Fergusson, E. A. (2012). Diets and trophic linkages of epipelagic fish predators in coastal Southeast Alaska during a period of warm and cold climate years, 1997–2011

<sup>43</sup> Beamish, R. J., & Mahnken, C. (2001). A critical size and period hypothesis to explain natural regulation of salmon abundance and the linkage to climate and climate change

<sup>44</sup> Duffy, E. J., & Beauchamp, D. A. (2008). Seasonal patterns of predation on juvenile Pacific salmon by anadromous cutthroat trout in Puget Sound

Salmon sharks in the North Pacific have been identified as important consumers of salmon, including Chinook. Nagasawa (1998)<sup>45</sup> estimated that salmon sharks could consume up to 12.6-25.2 million salmon annually in the North Pacific. Satellite-tagging studies by Carlisle et al. (2015)<sup>46</sup> reveal seasonal migrations of salmon sharks that closely track the distribution and timing of maturing salmon, indicating a strong top-down predator–prey coupling. Because sharks preferentially take larger individuals, increased shark predation can disproportionately remove the biggest, most fecund Chinook, shifting population size and age structure downward. Williams et al. (2018)<sup>47</sup> conducted a comprehensive diet study of salmon sharks in the eastern North Pacific and found that Pacific salmon, including Chinook, made up a significant portion of their diet, particularly during summer months.

Killer whales are another top predator whose population and feeding patterns can shape Chinook demographics. Orcas particularly the fish-eating "resident" ecotype, are known to be significant predators of Chinook salmon. Ford et al. (2010)<sup>48</sup> demonstrated that Chinook salmon are the preferred prey of resident killer whales in coastal waters of the northeastern Pacific, comprising over 70% of their diet in some areas.

Ohlberger et al. (2019)<sup>49</sup> published a groundbreaking study suggesting that increased predation by recovering populations of killer whales could be a major factor in the decline of Chinook salmon populations. Their research indicated that killer whale predation may be responsible for significant reductions in the abundance of large and older Chinook salmon across their range.

Building on this work, Oke et al. (2020)<sup>50</sup> used a modeling approach to estimate that killer whales may consume 2.7 to 5 million Chinook salmon annually in coastal waters of the northeastern Pacific. That magnitude of predation—focused on larger, more fecund individuals—has clear implications

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<sup>45</sup> Nagasawa, K. (1998). Predation by salmon sharks (*Lamna ditropis*) on Pacific salmon (*Oncorhynchus* spp.) in the North Pacific Ocean

<sup>46</sup> Carlisle, A. B., Goldman, K. J., Litvin, S. Y., Madigan, D. J., Bigman, J. S., Swithenbank, A. M., ... & Block, B. A. (2015). Stable isotope analysis of vertebrae reveals ontogenetic changes in habitat in an endothermic pelagic shark

<sup>47</sup> Williams, S. M., McHugh, M. J., Bester, M. N., Hofmeyr, G. J. G., & Pistorius, P. A. (2018). Salmon sharks: The apex predator you've probably never heard of

<sup>48</sup> Ford, J. K., Ellis, G. M., Olesiuk, P. F., & Balcomb, K. C. (2010). Linking killer whale survival and prey abundance: food limitation in the oceans' apex predator?

<sup>49</sup> Ohlberger, J., Schindler, D. E., Ward, E. J., Walsworth, T. E., & Essington, T. E. (2019). Resurgence of an apex marine predator and the decline in prey body size

<sup>50</sup> Oke, K. B., Cunningham, C. J., Westley, P. A. H., Baskett, M. L., Carlson, S. M., Clark, J., Hendry, A. P., Karatayev, V. A., Kendall, N. W., Kibele, J., Kindsvater, H. K., Kobayashi, K. M., Lewis, B., Munch, S., Reynolds, J. D., Vick, G. K., & Palkovacs, E. P. (2020).

for population productivity: selective removal of big, older spawners reduces average fecundity and can accelerate shifts toward earlier maturation and smaller body size. Taken together with evidence for elevated shark predation and climate-driven reductions in growth, these findings highlight how top-down forces can interact with bottom-up stressors to reshape Chinook life histories and complicate recovery efforts. Chasco et al. (2017)<sup>51</sup> developed an ecosystem model that incorporated apex predator effects and found that competition between recovering marine mammal populations and fisheries for Chinook salmon could be more intense than previously recognized.

Ohlberger et al. (2019) further explored the potential consequences of size-selective predation by killer whales on Chinook salmon populations. They found that intense predation on larger, older fish could lead to evolutionary changes in salmon life history, potentially contributing to the observed trends of earlier maturation and smaller size at age in Chinook populations. Numerous studies document the decline of size at age and decline of older-age chinook.

Manishin et.al. (2021)<sup>52</sup> used Salcha River Chinook as an indicator for Yukon River populations and found striking shifts in age structure, especially in northern Alaska where ocean-age-5 and older fish have become rare or absent. Their modeling indicates substantially higher mortality after the first winter at sea than previously estimated—an additional ~38% mortality among Chinook entering their third ocean year. The authors explicitly link their results to growing evidence of intense predation, noting consistency with studies implicating salmon sharks and marine mammals (including killer whales) as important sources of mortality.

These findings are supported by tagging and observational work. Seitz et.al. (2019)<sup>53</sup> using satellite tags, documented predation on ocean-age-3 Chinook by salmon sharks, providing direct empirical evidence that predators are removing mature, older fish at sea. Together, the modeling and tagging studies suggest that selective removal of larger, later-maturing individuals by predators can help explain the observed declines in size-and-age structure and the reduction in older age classes. In 2025, Alaska East Borough initiated a Chinook satellite tagging program; only three Chinook were tagged, one of which was consumed by a salmon shark several days later (personal communication)<sup>54</sup>

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<sup>51</sup> Chasco, B. E., Kaplan, I. C., Thomas, A. C., Acevedo-Gutiérrez, A., Noren, D. P., Ford, M. J., ... & Ward, E. J. (2017). Competing tradeoffs between increasing marine mammal predation and fisheries harvest of Chinook salmon

<sup>52</sup> Manishin, K. A., Cunningham, C. J., Westley, P. A., & Seitz, A. C. (2021). Can late stage marine mortality explain observed shifts in age structure of Chinook salmon?

<sup>53</sup> Seitz, A. C., Courtney, M. B., Evans, M. D., & Manishin, K. (2019). Pop-up satellite archival tags reveal evidence of intense predation on large immature Chinook salmon (*Oncorhynchus tshawytscha*) in the North Pacific Ocean

<sup>54</sup> Personal communication, Levy C. August 2025.

Pinniped predation is also affecting Chinook populations. Stellar sea lions, harbor seals, and grey seals have increased significantly over the past two decades while chinook populations are showing declines.

NOAA fisheries' 2020<sup>55</sup> report for the Western Distinct Population Segment (WDPS) Steller sea lion (*Eumetopias jubatus*) describes an annual population growth rate of 2.14 for non-pups and 1.78 for pups. More significantly along the migratory corridor of Chinook salmon from SE Alaska to the Western segment boundary on the Alaska Peninsula, growth rates are higher – 3.01 to 4.2 for non-pups, a rate that would double the population in roughly twenty years. NOAA's aggregate data for 2002-2017 estimate an increase from 30,000 to over 40,000 individuals. Since the 1970's new rookeries have been established in SE Alaska at Hazy Island in 1979, White Sisters in 1990, and Graves Rocks in the late 1990's further indicating population expansion (see Figures 9 & 10).

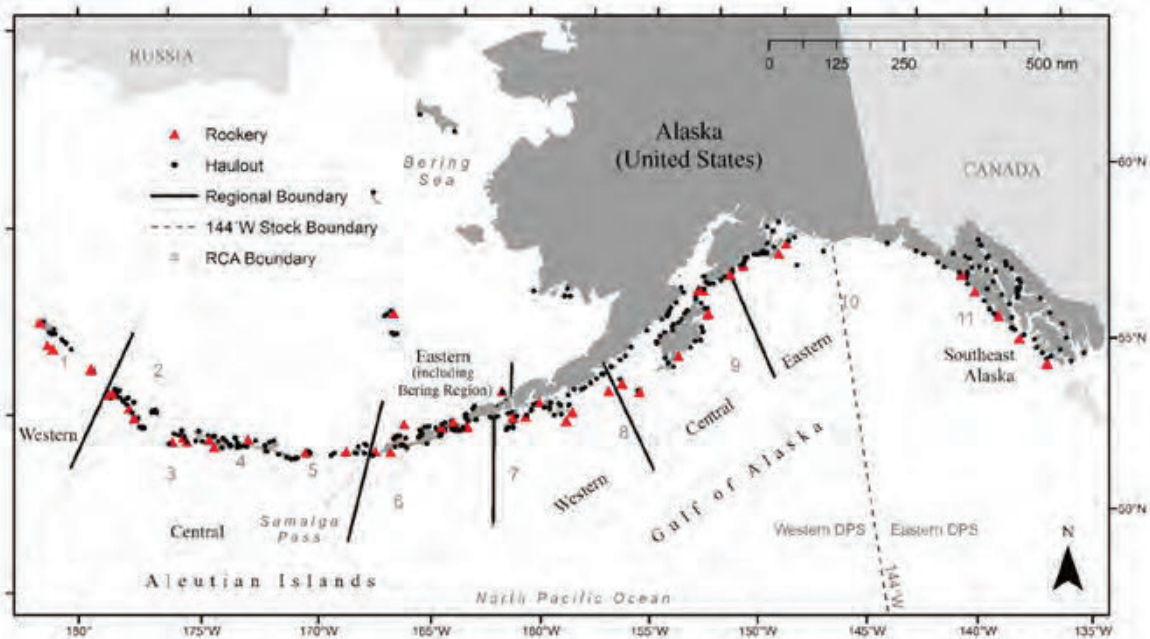


Figure 9. Map of Alaska showing the NMFS Steller sea lion survey regions, rookery cluster areas, rookery, and haul out locations. The line (144°W) separating the eastern and western DPSs also known as Cape Suckling.. Reproduced from Frit et.al. (2016c). NOAA Fisheries

<sup>55</sup> NOAA Fisheries, 2020. Western Distinct Population Segment Steller sea lion *Eumetopias jubatus* 5-Year Review : Summary and Evaluation

Area	Year Interval	Annual Rate of Change: Non-Pups	-95% CI	+95% CI	Annual Rate of Change: Pups	-95% CI	+95% CI
<b>Total U.S. Western DPS</b>	<b>2002-2017</b>	<b>2.14</b>	<b>1.49</b>	<b>2.78</b>	<b>1.78</b>	<b>1.19</b>	<b>2.34</b>
Eastern Gulf	2002-2017	4.21	2.04	6.26	2.65	0.99	4.63
Central Gulf	2002-2017	3.90	2.88	4.98	3.28	1.73	4.84
Western Gulf	2002-2017	3.01	1.50	4.56	3.65	2.31	5.12
Eastern Aleutians	2001-2016	1.75	0.37	3.13	3.10	2.13	4.00
Central Aleutians	2001-2016	<b>-0.67</b>	<b>-1.71</b>	<b>0.30</b>	<b>-1.29</b>	<b>-2.23</b>	<b>-0.16</b>
Western Aleutians	2001-2016	<b>-6.92</b>	<b>-8.41</b>	<b>-5.41</b>	<b>-7.52</b>	<b>-8.68</b>	<b>-6.59</b>

Figure 10. Annual rates of change (%y<sup>-1</sup> with 95% credible intervals) in counts of Stellar sea lion non-pups and pups in the U.S. portion of the WDPS modeled using ageTrend (with data from 1978 to 2017). Regional rates were calculated in the Gulf of Alaska regions for 2002-2017 and 2001-2016 for the Aleutian Island regions. Table reproduced from table provided by K. Sweeney, MML. NOAA Fisheries

NOAA Fisheries notes that pinniped predation is not identified as the primary driver of Chinook declines but increased pinniped numbers in regions that overlap critical Chinook migration routes or spawning areas, particularly in the Gulf of Alaska, could intensify predation pressure on vulnerable Chinook stocks.

Chasco et.al. (2017)<sup>56,57</sup> found that from 1975 to 2015 the biomass of Chinook salmon consumed by killer whales and pinnipeds increased from 6,100 to 15,200 metric tons, while in that same 40 year period human harvest of Chinook declined from 16,400 to 9,600 metric tons. Killer whales consumed the largest biomass, but seals consumed the greatest number of individual Chinook. The authors' key finding is that over the past 40 years Chinook total removals (harvest + consumption) have been driven primarily by pinnipeds and killer whales (see Figure 11). In a follow-up paper the authors conclude that the Marine Mammal Protection Act (1972) has been more successful than anticipated: killer whales and pinnipeds have recovered dramatically, with negative consequences for Chinook, coho, and sockeye populations.

<sup>56</sup> Chasco, B. E., Kaplan, I. C., Thomas, A. C., Acevedo-Gutiérrez, A., Noren, D. P., Ford, M. J., ... & Ward, E. J. (2017). Competing tradeoffs between increasing marine mammal predation and fisheries harvest of Chinook salmon.

<sup>57</sup> Chasco, B. et al. (2017). Estimates of Chinook salmon consumption in Washington State inland waters by four marine mammal predators from 1970–2015



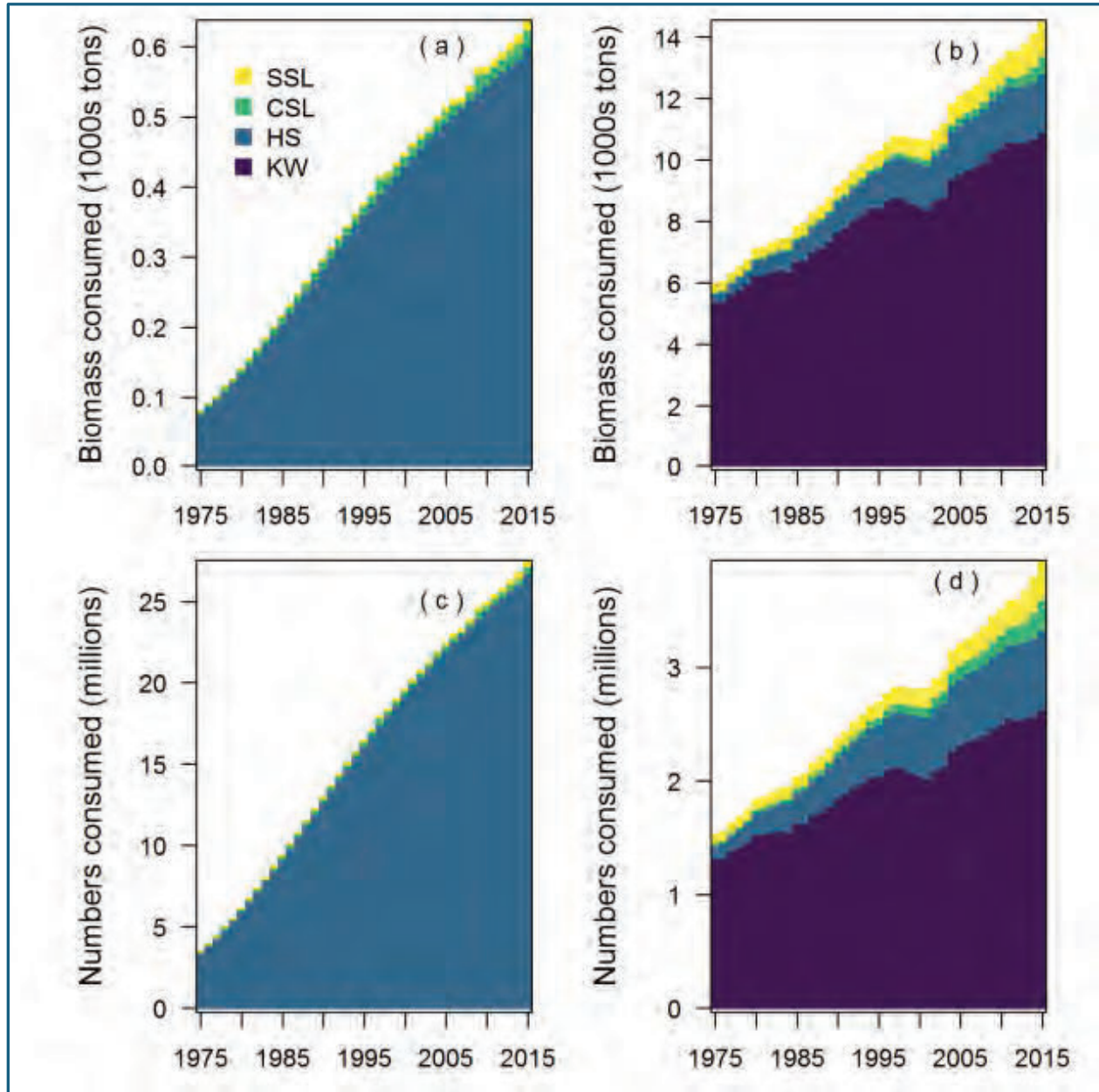


Figure 11. Consumption of Chinook salmon biomass((a) juveniles, (b) adults ocean age one and greater) and total numbers ((c) juveniles, (d) adults ocean age one and greater) by killer whales (KW), harbor seals (HS), California sea lions (CSL), and Stellar sea lions (SSL) from 1975 to 2015, Consumption is summed across all eight model areas. Figure from Chasco B. 2017. Note that the scales are different for each category. In all cases biomass of juveniles and adult Chinook consumed and total numbers of juvenile and adult Chinook consumed have more than doubled during this 40-year period.

Washington State Academy of Science 2022<sup>58</sup> convened an expert panel to assess pinniped abundance, the impact of pinniped predation on salmon populations, trophic relationships, and adaptive management options including lethal and non-lethal methodologies. The committee reviewed Chasco et al. (2017), NOAA fisheries research & monitoring, and much of the contemporary science cited in this section on apex predators.

The panel concluded that pinnipeds are primarily salmonivorous. Some individuals specialize by targeting smolts, while others preferentially target adult Chinook. The report's principal finding states:

*“.....the preponderance of evidence supports the hypothesis that current populations of pinnipeds are a contributing factor in the decline and depression of salmon populations in Washington State waters.”*

That conclusion does not automatically imply pinniped predation is equally significant in Alaska. However, NOAA's WDPS (2020) documents many of the same trends—substantial pinniped population increases, rookery expansion, elevated consumption, and regional Chinook declines—indicating pinnipeds are likely a contributing factor in Alaskan waters as well.

Converging model results and field observations suggest that post-first-winter mortality—driven in part by apex predators (killer whales, salmon sharks, seals, & Stellar sea lions)—may be an underappreciated driver of Chinook productivity declines. This underscores the need to integrate predator dynamics with oceanographic and prey-base studies when diagnosing population changes and designing management responses.

Future research directions include improving our understanding of the spatial and temporal dynamics of apex predator-prey interactions, quantifying and refining the relative impacts of different predator species on Chinook salmon populations.

## 5. Marine Food Dynamics

Recent research has highlighted the importance of marine food availability as a critical factor influencing the growth, survival, and productivity of Chinook salmon populations. Changes in ocean

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<sup>58</sup> Washington State Academy of Science 2022. Pinniped predation on salmonids in Washington Portions of the Salish Sea and Outer Coast

conditions and food web dynamics can significantly impact salmon health and condition. Recent marine heat waves in the Bering Sea and North Pacific Ocean have had significant impacts on Chinook salmon populations. These shifts are repeatedly linked to poorer fish condition, slower growth, and higher overwinter mortality for Chinook cohorts that enter a changed ocean environment.

Yasumiishi et al. (2020)<sup>59</sup> reported significant declines in the body condition of juvenile Chinook and chum salmon in the eastern Bering Sea during the marine heat wave years. They found that salmon had lower lipid content and reduced energy density compared to previous years, indicating poorer feeding conditions and a higher risk of overwinter mortality. These health condition declines likely translate into reduced early-marine survival and weaker cohort strength for affected years.

Building on this work, Murphy et al. (2021)<sup>60</sup> examined the impacts of the marine heat wave on the distribution and abundance of forage fish species that are important prey for salmon. They discovered that warming waters led to northward shifts in the distribution of key prey species, potentially creating a mismatch between salmon migration patterns and food availability.

Farley et al. (2020)<sup>61</sup> conducted comprehensive surveys in the Gulf of Alaska during the International Year of the Salmon expeditions. Their findings revealed that Chinook salmon caught during the marine heat wave years had significantly lower energy reserves compared to historical averages. This reduction in lipid stores likely drives salmon survival, maturation timing, and reproductive success, reinforcing the work of Yasumiishi and Murphy et.al.

These studies collectively demonstrate how extreme ocean conditions can exacerbate food limitations for Chinook and other salmon species, highlighting the vulnerability of these populations to climate-driven changes in marine ecosystems.

Shuntov and Temnykh (2011)<sup>62</sup> conducted extensive surveys in the western Bering Sea and provided valuable insights into the marine ecology of Pacific salmon, including Chinook. Their work

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<sup>59</sup>Yasumiishi, E. M., Farley, E. V. Jr, Maselko, J., Aydin, K. Y., Kearney, K. A., Hermann, A. J., Ruggerone, G. T., Howard, K. G., and Strasburger, W. W. 2020. Differential north–south response of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) marine growth to ecosystem change in the eastern Bering Sea, 1974–2010

<sup>60</sup>Murphy, James & Howard, Kathrine & Garcia, Sabrina & Moss, Jamal & Strasburger, Wesley & Sewall, Fletcher & Lee, Elizabeth. (2021). Juvenile Yukon River Chinook Salmon in a Warming Arctic..

<sup>61</sup>Farley, E.V., Jr., J.M. Murphy, K. Cieciel, E.M. Yasumiishi, K. Dunmall, T. Sformo, and P. Rand. 2020. Response of Pink salmon to climate warming in the northern Bering Sea.

<sup>62</sup>Shuntov, V. P., & Temnykh, O. S. (2011). Concerning modern concepts of the role of Pacific salmon in the ecosystems of the far eastern seas and the north Pacific Ocean

suggested that changes in ocean productivity and zooplankton community structure could have substantial effects on salmon feeding and growth. They noted that while overall biomass of forage resources might not have decreased significantly, shifts in the composition and distribution of prey species could create localized food limitations for salmon.

Shuntov et al. (2017)<sup>63</sup> extended this body of work by examining long-term shifts in the nekton community of the western Bering Sea and North Pacific and their links to salmon variability. They found that salmon abundance closely tracked changes in key prey groups—particularly small pelagic fishes and squid—illustrating how shifts at lower trophic levels propagate up the food web. Their results underscore that the ocean’s carrying capacity for salmon is not static but fluctuates with community composition and productivity, which are themselves sensitive to climate variability and marine heat events. Taken together with findings on reduced salmon energy density and altered prey fields during warm years (e.g., Yasumiishi et al. 2020), Shuntov et al. highlight the need to account for dynamic trophic interactions when assessing salmon production.

Daly et al. (2017)<sup>64</sup> examined juvenile Chinook diets off the coasts of Oregon and Washington and found that during years of poor ocean conditions—marked by reduced upwelling and warmer temperatures—diet diversity and prey quality declined. Reduced prey diversity and a shift toward lower-energy items imply nutritional stress during a critical growth window, which can reduce size at the end of the first summer and lower overwinter survival. This work reinforces findings from the Bering Sea and Gulf of Alaska: climate-driven changes in ocean physics and productivity can create bottom-up food limitations that directly reduce juvenile growth and cohort strength. Daly et al. highlights the value of integrated monitoring of ocean conditions, prey fields, and juvenile condition to anticipate poor survival years.

Ruggerone and Irvine (2018)<sup>65</sup> argue that increased abundance of pink and chum salmon, partly due to large-scale hatchery production, might be leading to food limitations for other salmon species, including Chinook. Their modeling speculates that competition from abundant pink and chum may

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<sup>63</sup> Shuntov, V., O. Temnykh, and O. Ivanov. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon (*Oncorhynchus* spp.).

<sup>64</sup> Daly, E. A., Brodeur, R. D., & Auth, T. D. (2017). Anomalous ocean conditions in 2015: impacts on spring Chinook salmon and their prey field.

<sup>65</sup> Ruggerone, G. T., & Irvine, J. R. (2018). Numbers and biomass of natural-and hatchery-origin pink salmon, chum salmon, and sockeye salmon in the North Pacific Ocean, 1925-2015

interact with poor ocean conditions to exacerbate Chinook declines in some systems. However, to reiterate by contrast, Daly and Shuntov's empirical work emphasizes bottom-up forcing,

Hertz et al. (2016)<sup>66</sup> used stable isotope analysis to examine the marine diets of Chinook salmon across the North Pacific and found pronounced regional and temporal differences in prey composition. Their results underscore that local oceanographic conditions strongly shape food availability, so populations occupying distinct oceanic niches experience different prey regimes and nutritional risks. Consequently, some Chinook stocks—those with more restricted or specialized ocean distributions—are likely more vulnerable to food-limitation during poor ocean years, highlighting the need for regionally targeted monitoring.

NOAA Fisheries research indicates that warming in the Bering Sea and Gulf of Alaska is shifting the timing and spatial distribution of zooplankton blooms, increasing the risk of a trophic mismatch between smolt ocean entry and peak prey availability (Yasumiishi et al., 2020)<sup>67</sup>. These changes—together with altered prey composition and reduced energy density of available forage—create acute early-marine stress for juvenile Chinook, undermining growth during the critical first summer at sea. Work from the Ocean Salmon Ecology Program corroborates these findings, documenting early-marine stressors in Yukon Chinook that are consistent with seasonal mismatches and lower prey quality.

Ohlberger et al. (2018)<sup>68</sup> proposed that size-selective mortality—driven by a combination of food limitations and elevated predation—helps explain the widespread decline in Chinook size-at-age. When high-quality prey is scarce, juveniles grow more slowly and cohorts enter the ocean in poorer condition; those nutritional stresses, combined with predators that preferentially remove larger fish, can favor earlier maturation at smaller sizes. Collectively, these and related studies show how extreme ocean conditions amplify food-limitation effects and make Chinook populations especially vulnerable to climate-driven changes in marine ecosystems.

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<sup>66</sup> Hertz, E., Trudel, M., Brodeur, R. D., Daly, E. A., Eisner, L., Farley Jr, E. V., ... & Harding, J. A. (2015). Continental-scale variability in the feeding ecology of juvenile Chinook salmon along the coastal Northeast Pacific Ocean

<sup>67</sup> Yasumiishi, E. M., Farley, E. V. Jr, Maselko, J., Aydin, K. Y., Kearney, K. A., Hermann, A. J., Ruggerone, G. T., Howard, K. G., and Strasburger, W. W. 2020. Differential north–south response of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) marine growth to ecosystem change in the eastern Bering Sea, 1974–2010

<sup>68</sup> Ohlberger, J., Ward, E. J., Schindler, D. E., & Lewis, B. (2018). Demographic changes in Chinook salmon across the Northeast Pacific Ocean. *Fish and Fisheries*, 19(3), 533-546

Interactions with pink salmon appear to be a minor factor in many regions: recent work by Yasumiishi et.al.(2024)<sup>69</sup> has not found consistent negative effects and in some analyses shows weak or even slightly positive associations, reinforcing that bottom-up ocean conditions and predator dynamics are the primary concerns.

Marine zooplankton dynamics associated with Prince William Sound pink salmon are consistent with findings from Yasumiishi and Shutov. Cooney (1993)<sup>70</sup> estimated pink fry consumption in PWS in the early 1990s—when pink production was comparable to 2025 levels—at 0.6–8% of total herbivore production and 2.0–32.2% of microzooplankton production. Those estimates assumed no pink salmon mortality; typically, early marine mortality is 50 to 90% within the first forty-five days (Parker, 1968)<sup>71</sup>. Applying realistic fry mortality reduces consumption to roughly 0.8-3.2% for herbivore production and 3.0-10.0% of microzooplankton - results are consistent with research done by Orsi et.al.<sup>72</sup> in Southeast Alaska.

Boldt et.al. (2002)<sup>73</sup> used a bioenergetic approach in PWS through a bioenergetic approach in the late 1990’s and estimated that aggregate primary and secondary (zooplankton) consumption by pink salmon was about 0.06-0.45% of annual zooplankton biomass for near shore and offshore areas. If standing zooplankton biomass were held constant for a ten-day period, pink salmon consumption would be roughly 15% of calanoid copepods and 19% of amphipods. However, calanoid copepods and amphipods are not static; reproduction, advection and upwelling continually replenish prey.

Prey	Density (#/m <sup>2</sup> )	Wet weight (×10 <sup>-3</sup> g)	Standing stock (g C/m <sup>2</sup> )	Pink salmon consumption (% of standing stock)
Large copepods	265.3928	0.6160	0.0093	1.51
Amphipods	31.8471	0.3910	0.0007	1.90
Cladocerans	7,452.2293	0.0700	0.0297	0.45
Larvaceans	2,813.1635	1.4870	0.2384	0.05

Figure 12. Estimates of zooplankton density (Purcell 2000), standing stock, and pink salmon consumption, assuming the area of PWS is 8.8x10<sup>9</sup> m<sup>2</sup> (Grant and Higgins 1910), and a carbon to wet weight conversion factor of 0.0898

<sup>69</sup> Yasumiishi, E. M., C. J. Cunningham, E. V. Farley, L. B. Eisner, W. W. Strasburger, J. A. Dimond, and P. Irvin. 2024. Biological and environmental covariates of juvenile sockeye salmon distribution and abundance in the southeastern Bering Sea, 2002-2018

<sup>70</sup> Cooney R. T., 1993 A theoretical evaluation of the carrying capacity of Prince William Sound, Alaska, for juvenile Pacific salmon

<sup>71</sup> Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia

<sup>72</sup> Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions

<sup>73</sup> Boldt, J.L., Haldorson, L.J., 2002. A bioenergetics approach to estimating consumption of zooplankton by juvenile pink salmon in Prince William Sound, Alaska.

*for large calanoid copepods, 0.0949 for amphipods, and 0.0844 for other prey (Omori 1969). Large copepod, amphipod, cladoceran (Boldt 2001) and larvacean (K. Coyle, U of Alaska Fairbanks.*

Boldt et.al. conclude: “This study indicates that juvenile pink salmon did not consume a large proportion of zooplankton biomass or production in PWS.”

A 2005 study by Cross et.al.<sup>74</sup>, using bioenergetics modelling examined instantaneous zooplankton biomass and pink salmon consumption in near shore and offshore regions of PWS and estimated pink salmon consumed 64-107% of their theoretical maximum prey consumption – values not representative of open-ocean dynamics. The researchers acknowledged that PWS is not a closed system and “advection and production of zooplankton continually replenish the forage base”.

Collectively, these studies indicate that while local and short-term consumption by pink salmon can be substantial, longer-term and basin-scale estimates typically indicate only a modest proportion of total zooplankton production is consumed. Considering the importance of zooplankton standing stock dynamics to wild and enhanced salmon, PWSAC has maintained consistent zooplankton sampling at all release sites for decades. The PWSAC data shows variable but consistently high spring zooplankton densities.

## **6. Marine Harvest, Interception, and Bycatch of Chinook Salmon**

Chinook salmon are subject to directed harvests such as sport & sport charter, and S.E. troll; and non-directed or incidental marine harvests such as seine, gillnet, or trawl fisheries. Interception fisheries are defined as Chinook harvested in marine or freshwater fisheries prior to arriving at its natal spawning grounds. Chinook harvested in marine waters or downriver in the Yukon or Stikine Rivers on their migration to spawning grounds, tens of miles or hundreds of miles away, are considered interception fisheries, or sometimes called mixed stock fisheries.

Commercial and recreational fisheries targeting Chinook salmon in marine waters are important economic drivers in many Alaskan coastal communities. These fisheries have faced increasing restrictions in recent years due to declining Chinook abundance. Purse seine fisheries in S.E. Alaska, and Kodiak are required to release incidental harvest of Chinook 28” in length or greater, often coined non-retention.

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<sup>74</sup> Cross, A.D., D.A. Beauchamp, K.W. Myers, and J.H. Moss. 2005. Consumption demand of juvenile pink salmon in Prince William Sound and the coastal Gulf of Alaska in relation to prey biomass

The Pacific Salmon Commission (PSC) plays a crucial role in Chinook salmon harvest in the Pacific Northwest and Alaska. The PSC's Chinook Technical Committee (2020)<sup>75</sup> reported that coast-wide Chinook salmon catches have generally declined since the 1970s and 1980s, with some fluctuation. This decline is largely due to reduced abundance and stricter harvest regulations aimed at protecting vulnerable populations.

Chinook salmon harvests have been particularly low in recent years. The Alaska Department of Fish and Game (2021)<sup>76</sup> reported that commercial harvests of Chinook salmon in 2020 were among the lowest on record, continuing a trend of below-average productivity over the past decade.

The Bering Sea pollock fishery has been a focus of bycatch reduction efforts. Stram and Ianelli (2015)<sup>77</sup> provided a comprehensive review of Chinook salmon bycatch management in this fishery, including the implementation of catch limits and incentive programs to reduce bycatch. These measures have generally been effective in reducing but not eliminating Chinook bycatch, with annual catches decreasing from peak years of over 120,000 fish in the early 2000s to an average of around 20,000 in recent years (North Pacific Fishery Management Council, 2022)<sup>78</sup>.

However, concerns remain about the impacts of this bycatch on specific salmon populations. Guthrie et al. (2021)<sup>79</sup> used genetic stock identification techniques to determine the origins of Chinook salmon caught as bycatch in the Bering Sea. They found that while the bycatch included salmon from a wide geographic range, some vulnerable stocks, particularly from western Alaska, were disproportionately represented in some years.

Chinook salmon bycatch also occurs in Gulf of Alaska groundfish fisheries, including those targeting pollock, Pacific cod, and rockfish. Whittle et al. (2019)<sup>80</sup> analyzed bycatch patterns in these fisheries and found significant variability both spatially and temporally. The North Pacific Fishery

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<sup>75</sup> Pacific salmon commission chinook technical committee report, Annual Report of catch and escapement for 2019. TCChinook (20)-01

<sup>76</sup> Alaska Department of Fish and Game. (2021). Chinook Salmon Stock Status and Research in Southeast Alaska. Technical Report.

<sup>77</sup> Stram, D. L., & Ianelli, J. N. (2015). Evaluating the efficacy of salmon bycatch measures using fishery-dependent and -independent data

<sup>78</sup> North Pacific Fisheries Management Council Report 2022. //npfmc.b-cdn.net/wp-content/PDFdocuments/bycatch/BeringSeaSalmonBycatchFlyer.pdf

<sup>79</sup> Guthrie, C. M., Nguyen, H. T., Guyon, J. R., Cunningham, C. J., Hamon, T. R., & Templin, W. D. (2021). Genetic stock composition analysis of Chinook salmon bycatch in the 2019 Bering Sea groundfish fisheries.

<sup>80</sup> Whittle, J. A., Fissel, B. E., Dalton, M. G., Garber-Yonts, B. E., Lee, S. T., & Kasperski, S. (2019). Socioeconomic effects of Chinook salmon bycatch management measures in the Gulf of Alaska groundfish trawl fishery.



Management Council has implemented bycatch limits for these fisheries as well, with closures occurring if limits are reached.

High seas driftnet fisheries historically caught significant numbers of Chinook salmon, but these fisheries were largely banned in the early 1990s. However, IUU (Illegal, Unreported, and Unregulated) fishing remains a concern. A study by Pramod et al. (2014)<sup>81</sup> estimated that IUU fishing in the North Pacific could still be impacting salmon populations, though quantifying these impacts remains challenging.

Chinook directed fisheries, bycatch, and interception fisheries are regulated and well documented by harvest number and genetic stock groups. These fisheries have been active for decades and in some cases over a hundred years and these relatively small harvests compared to predation by apex predators, do not explain the decline in Chinook over the past two decades. In S.E. Alaska several Chinook stocks are rebounding and have been removed from stock of concern status. It may be that the negative Pacific Decadal Oscillation (PDO)<sup>82</sup> is swinging back to a more positive productivity regime, although the PDO index is thought to be less predictive in the advent of large marine heat waves, strong El Ninos, and changes in the North Pacific Gyre Oscillation.

## 7. Freshwater Habitat Changes

Freshwater habitats in most of Alaska remain largely pristine, with a few notable exceptions- such as the northern pike invasion in Cook Inlet and localized mining impacts along remote stretches of the Yukon River, as documented in the State of Alaska response to WFC<sup>83</sup>. Even so, Chinook salmon face growing challenges from changing freshwater temperatures.

Recent studies report a range of effects in both spawning and rearing areas, including warmer summer temperatures that can reduce embryo and juvenile survival, promote earlier fry emergence and smolt outmigration which increase the risk of mismatches with ocean prey. Additionally, altered flow regimes from changing precipitation and glacial melt degrade rearing habitat (Howard et al.

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<sup>81</sup> Pramod, G. & Nakamura, Katrina & Pitcher, Tony J. & Delagran, Leslie, 2014. Estimates of illegal and unreported fish in seafood imports to the USA

<sup>82</sup> Mantua, N. J., S. R. Hare, Y. Zhang, J. M. Wallace and R. C. Francis (1997): A Pacific interdecadal climate oscillation with impacts on salmon production.

<sup>83</sup> State of Alaska letter September 6, 2024 Request for information, 90-Day Finding on a Petition to List Gulf of Alaska. Page 22.

2015)<sup>84</sup>. These freshwater stressors, while occurring against a backdrop of generally intact habitat, compound marine-driven pressures and contribute to reduced Chinook productivity. Howard et.al. also noted increased summer water temperatures, which can exceed thermal tolerances for Chinook salmon, particularly in low-flow conditions.

The retreat of glaciers and loss of snowpack are reducing the buffering of stream flows and temperatures, resulting in more extreme low-flow events during summer months. This can lead to the drying of critical spawning and rearing habitats, as documented by von Biela et al. (2020)<sup>85</sup> in their study of the Knik River system.

von Biela et.al. (2020)<sup>86</sup> in another paper that year- *Evidence of prevalent heat stress in Yukon River Chinook salmon* reached three major clear conclusions: (1) water temperatures around 18°C approximate a threshold for heat stress in adult Chinook during the spawning period; (2) summer water temperatures routinely exceeded that threshold each July over the last two decades; and (3) molecular indicators—gene transcription patterns and protein expression—demonstrate widespread physiological heat stress in those fish (see map next page).

Subsequent observations by von Biela, Feddern, and colleagues document lethal or near-lethal spawning temperatures in multiple interior systems, reinforcing their findings. These temperature extremes offer a more direct mechanistic explanation for the pronounced Chinook and chum declines in the Yukon–Kuskokwim drainages than other hypotheses: acute heat can cause immediate mortality, while sublethal exposure reduces egg viability, lowers adult fecundity and condition, and degrades next-generation fitness through lower egg deposition and poorer offspring survival. Importantly, interior and northern Alaska rivers are warming faster than much of the rest of the state, increasing the frequency and severity of temperature exceedances during the critical spawning window. Taken together, the physiological, molecular, and observational evidence from von Biela and collaborators elevates freshwater thermal stress as a primary, geographically concentrated driver of population collapse in these interior systems—and a priority target for monitoring, vulnerability assessment, and adaptive management.

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<sup>84</sup> Howard, K. G., Dubois, L., & Falke, J. A. (2015). Assessing the thermal resilience of Alaska's Chinook salmon populations

<sup>85</sup> von Biela, V. R., Scheuerell, M. D., Buhle, E. R., & Hinton, S. E. (2020). Habitat metrics indicate juvenile Chinook salmon are more limited by degraded spawning habitats than early marine conditions.

<sup>86</sup> von Biela, V. R., Bowen, L., McCormick, S. D., Carey, M. P., Donnelly, D. S., Waters, S., Regish, A. M., Laske, S. M., Brown, R. J., & Larson, S. (2020). Evidence of prevalent heat stress in Yukon River Chinook salmon.

Murdoch et al. (2024)<sup>87</sup> in their study *Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity* corroborate von Biela's findings further up the Yukon River in Canada. Using a multi-stage analysis, they show that positive drivers of Yukon Chinook productivity include robust snowpack and cooler winter freshwater temperatures, while the strongest negative influences are wetter rearing-season precipitation, warmer upriver temperatures, accumulated rearing degree-days, and earlier ice-out. Importantly, pink salmon abundance ranked among **the least influential variables** in their models. Together with von Biela's physiological and molecular evidence of heat stress, Murdoch et al. strengthen the conclusion that freshwater thermal and hydrological changes—rather than interspecific competition with pinks—are primary drivers of the severe productivity declines in Yukon River Chinook.

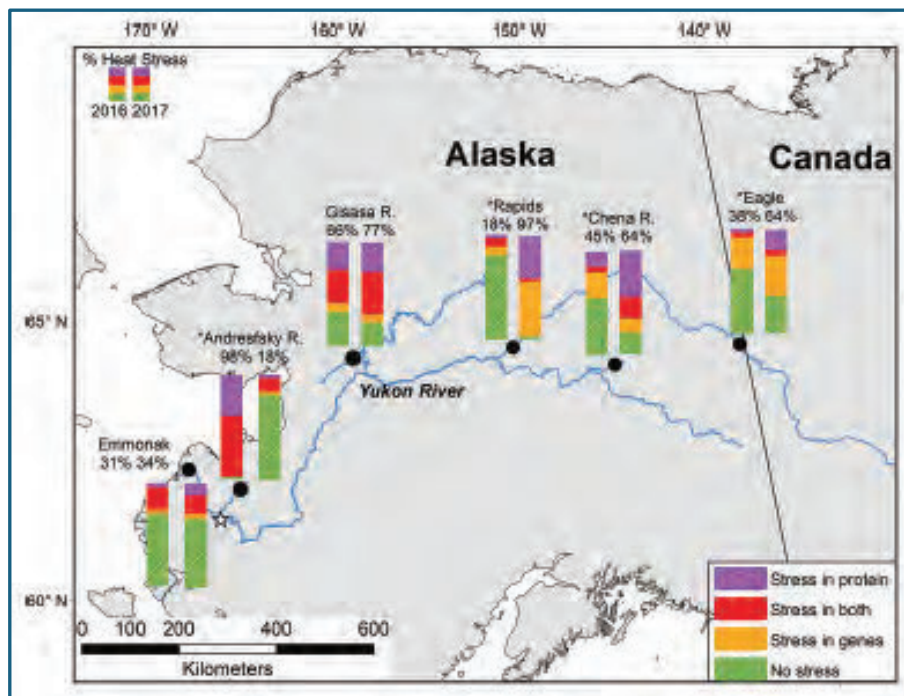


Figure 13. A map depicting the percentage of Chinook salmon in each capture location (black circles) and year with evidence of heat stress. Paired stacked bar charts reflect the heat stress classifications from gene transcript and HSP70 protein for fish captured in summer 2016 (left) and 2017 (right). Fill reflects the proportion of individuals in each of the four heat stress categories: hatched green – no evidence of heat stress in either gene transcript or HSP70 protein; gold – heat stress identified only in gene transcript; red – heat stress identified in gene transcript and elevated HSP70 protein; and purple – heat stress identified only by elevated HSP70 protein. Numbers near each bar are the sum across the three categories that identified heat stress presence. From von Biela 2020<sup>73</sup>. **Extreme high heat stress** in 2016 for Andreasfshy (98%), Gisasa (66%), and in 2017 for Gisasa (77%), Rapids (97%), and Chena (64%).

<sup>87</sup>Murdoch, A., B.M. Connors, N.W.R. Lapointe, J. Mills Flemminge, S.J. Cooke, and C. Mantyka-Pringle, Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity 2024.

In addition to climate change, human activities are transforming some freshwater habitats in ways that impact Chinook salmon. These impacts may be relatively small in the context of Alaska’s mostly pristine habitat, but the results can be locally important. A report by the Alaska Department of Fish and Game highlighted several key threats, including urbanization, resource extraction, and infrastructure development, pointing out that these can degrade riparian areas, increase sedimentation, and alter hydrology.

Dunker et al. (2018)<sup>88</sup> and Deacy et al. (2021)<sup>89</sup> document how localized, human-induced habitat alterations—river modification, resource extraction, land-use change, and invasive species—have harmed Chinook in Alaskan watersheds. These changes reduce spawning success, lower juvenile survival, and alter migration timing and pathways, which can compound climate-driven stresses and increase vulnerability for already at-risk populations.

Mining in the Yukon River basin poses a localized but important threat to Chinook spawning and rearing habitat. Schoen et al. (2017)<sup>90</sup> and Scanlon et al. (2021)<sup>91</sup> document how mining operations can increase sediment loads and release heavy metals into tributaries, degrading water quality and physical habitat in affected reaches. Elevated turbidity and sediment deposition can smother redds and reduce egg and alevin survival, while contaminants such as mercury and other metals can bioaccumulate and produce sublethal physiological and behavioral effects that reduce juvenile survival and adult fitness.

Over the past two decades the Anchorage Bowl and Cook Inlet region have experienced the introduction of invasive northern pike (*Esox lucius*) and an aquatic plant Elodea, —that degrade Chinook freshwater habitat and alter predator–prey dynamics. Elodea chokes waterways, reduces flow, and can lower dissolved oxygen, degrading rearing conditions for juvenile salmon. Northern

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<sup>88</sup> Dunker, K. J., Sepulveda, A. J., Massengill, R. L., & Rutz, D. S. (2018). The response of northern pike and other aquatic taxa to a rapidly changing environment in the Susitna River, Alaska.

<sup>89</sup> Deacy, W. W., Armstrong, J. B., Leacock, W. B., Robbins, C. T., Larrivee, D., & Gustine, D. D. (2021). Landscape heterogeneity shapes the thermal portfolio of a mobile consumer.

<sup>90</sup> Schoen, E. R., Wipfli, M. S., Trammell, E. J., Rinella, D. J., Floyd, A. L., Grunblatt, J., ... & Platte, R. M. (2017). Future of Pacific salmon in the face of environmental change: Lessons from one of the world's remaining productive salmon regions.

<sup>91</sup> Scanlon, B., Frenette, M., Minuk, L., Twardek, W., Chu, C., & Smokorowski, K. (2021). Evaluating the Impacts of Mining Disturbances on Chinook Salmon (*Oncorhynchus tshawytscha*) Populations in the Yukon River Basin

pike, which are native to northern and western Alaska but invasive in Southcentral Alaska, thrive in shallow, low-flow, vegetated waters and are effective predators on juvenile Chinook (Dunker et al., 2018<sup>92</sup>; Jalbert et al., 2021<sup>93</sup>; Inskip, 1982<sup>94</sup>; Stuby, 2023<sup>95</sup>). Northern Cook Inlet (NCI) is unique in the Gulf of Alaska in that the freshwater predation regime has shifted substantially over recent decades; the establishment of pike in key rearing habitats likely contributes to local declines in juvenile abundance and recruitment. Though these impacts are geographically localized, they can have outsized effects where they coincide with other stressors, underscoring the need for targeted monitoring, control efforts, and habitat restoration in invaded systems. The impact of northern pike on Alexander Creek Chinook productivity has been evident over the past two decades, which coincides with the northern pike invasion (figure 14).

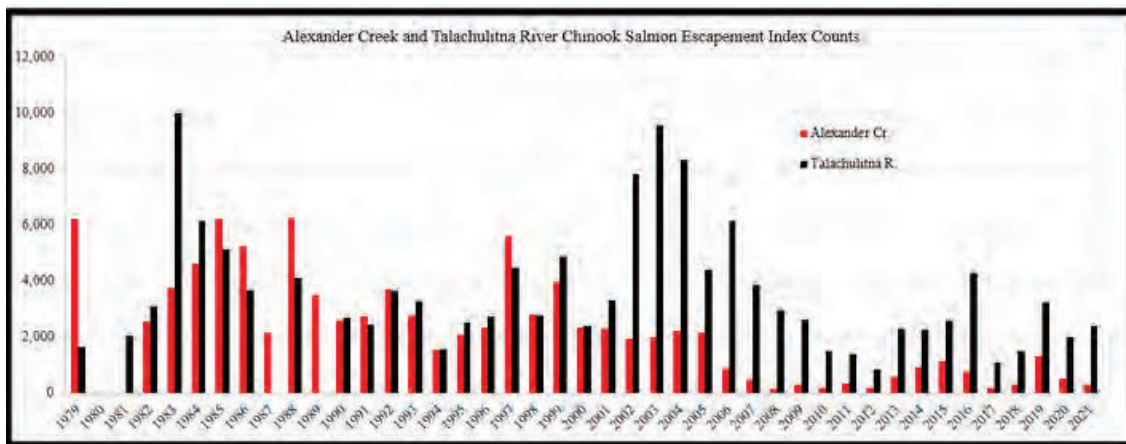


Figure 14. Comparison of Chinook salmon escapement index counts in Alexander Creek (northern pike present) and Talachulitna River (no northern pike present), 1979-2021. (from ADF&G) Severe Chinook decline beginning in 2006 in Alexander Creek, whereas Talachulitna River did not sustain comparable decline.

## 8. Impact of Pink Salmon on Chinook and Ocean Carrying Capacity

Conjectures that abundant pink salmon (*Oncorhynchus gorbuscha*) are driving Chinook declines has received substantial attention in the media, but the evidence is speculative and context-dependent.

<sup>92</sup> Dunker, K. J., Sepulveda, A. J., Massengill, R. L., & Rutz, D. S. (2018). The response of northern pike and other aquatic taxa to a rapidly changing environment in the Susitna River, Alaska

<sup>93</sup> Jalbert, C. S., Falke, J. A., López, J. A., Dunker, K. J., Sepulveda, A. J., & Westley, P. A. H. (2021). Vulnerability of Pacific salmon to invasion of northern pike (*Esox lucius*) in Southcentral Alaska

<sup>94</sup> Inskip, P. D. (1982). Habitat suitability index models: Northern pike.

<sup>95</sup> Stuby, L. Fishery Management Report for Sport Fisheries in the Yukon Management Area, 2017, Alaska

Conner et.al. (2024)<sup>96</sup>, argue that warming oceans disproportionately favor pink salmon: they have the broadest environmental tolerances, the simplest spawning requirements, and consequently the greatest capacity for rapid numerical expansion among Pacific salmon. That perception is often conflated with hatchery effects, yet most pink salmon in the North Pacific and Bering Sea are wild (~85%)—Southeast Alaska returns (harvest + escapement) can exceed 100 million adults in some years, and roughly 97% of those are wild; the Alaska Peninsula also supports very large pink cohorts without any hatchery inputs.

Ecologically, large pink cohorts may, in theory, reduce food availability, although work by Orsi et.al. (2005)<sup>97</sup> demonstrate little reduction in zooplankton standing biomass. Many empirical and modeling studies point to bottom-up ocean conditions and predator dynamics as the dominant drivers of Chinook performance. Several regional analyses (e.g., Morita et al., Yasumiishi, Murdoch et al., NOAA/ADF&G task-force findings) show either weak or inconsistent relationships between pink abundance and Chinook productivity; in most regions pinks appear to have little measurable impact, while in others they may exacerbate food-limitation during years of poor ocean productivity.

Heard et.al.<sup>98</sup> estimated that 30 billion pink and chum salmon fry enter the Bering Sea and North Pacific Ocean each year, 25 billion of these are from wild streams, intertidal habitat, and rivers, while the other 5 billion pinks, chum, sockeye, Chinook, and coho are from Russian, Japanese, Canadian, PNW, and Alaska hatchery programs. Of the hatchery fish, Russia releases ~1.2 billion pinks, Japan releases ~1.3 billion chum fry, and Alaska releases 1 billion pinks and 0.8 billion chum salmon.<sup>99</sup> In concurrence with Heard, Ruggerone and Irvine (2018) estimated that 85% of pink salmon abundance is wild.<sup>100</sup> Looking at total nektonic production which includes squid and all fishes, salmon is only 3.4% of this biomass and pink salmon is less than 1%. This indicates that pink salmon have low to moderate impacts on oceanic food webs, and they respond to, rather than control, changes in ocean

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<sup>96</sup> Conners, B.M., Ruggerone, G.T., & Irvine, J.R. 2024. Adapting management of Pacific salmon to a warming and more crowded ocean

<sup>97</sup> Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions.

<sup>98</sup> Heard, W. R. 2011. A comparison of salmon hatchery programs in Alaska and Japan, p. 71-78 In R. Stickney, R. Iwamoto, and M. Rust (editors)

<sup>99</sup> North Pacific Anadromus Fisheries Commission, Annual Report 2022

<sup>100</sup> Ruggerone, G. T., & Irvine, J. R. (2018). Numbers and biomass of natural-and hatchery-origin pink salmon, chum salmon, and sockeye salmon in the North Pacific Ocean, 1925-2015

productivity. Pauley et.al. (1996) looked at North Pacific Ocean mass balancing and estimated total salmon biomass consumes < 1% of the estimated zooplankton biomass.<sup>101</sup>

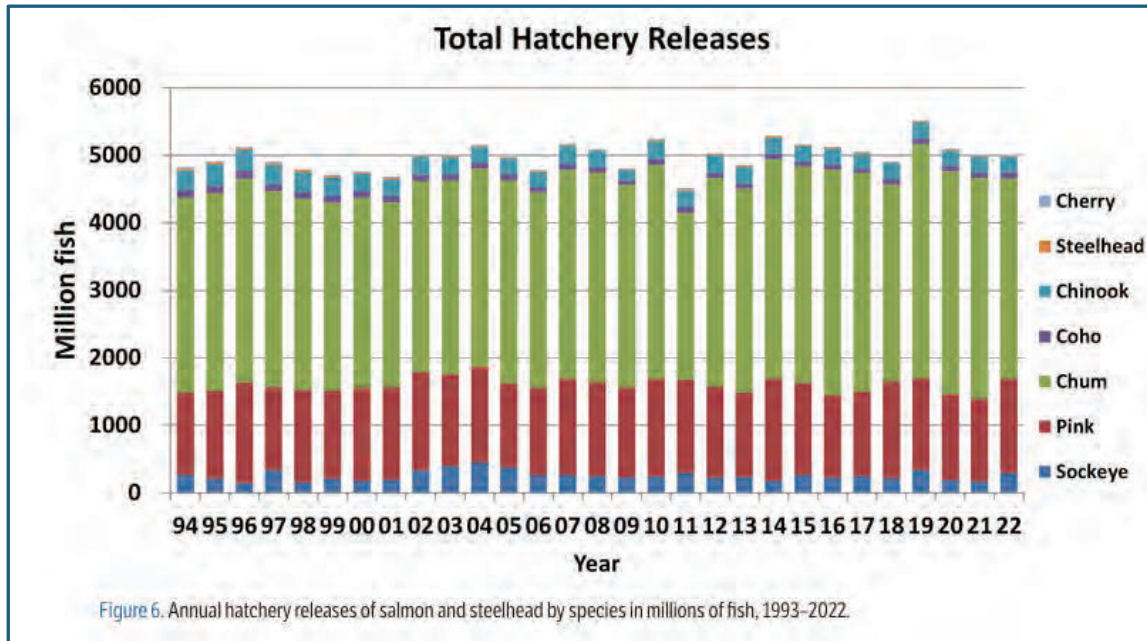


Figure 15. Annual hatchery releases of salmon and steelhead trout by from Russia, Japan, U.S., Korea, and Canada in millions of fish, 1993-2022. NPAFC Note the release of fry has been stable at 5 billion for three decades

**Wild pink salmon** have surged in recent decades, with Alaska returns peaking in the early-to-mid 2010s—2013 saw a record 219 million pinks (Ruggerone and Irvine 2018). More recently, productivity has shifted to the western Bering Sea, where Russian harvests exploded between 2018–2023 and reached a record 500 million pinks in 2018 (about 2.3 times Alaska’s record). This dramatic increase in abundance has prompted concern about potential competition and other ecological interactions in the marine environment (see map graphic on page 39). Importantly, hatchery production from Alaska and Russia accounts for only about 15% of pink salmon returns (and an even smaller share of total catch plus escapement), so most of the recent growth has occurred in wild populations.

<sup>101</sup> Pauley, D., V. Chrisensen, and N. Haggan. 1996. Mass-balance models of Northeastern Pacific ecosystems

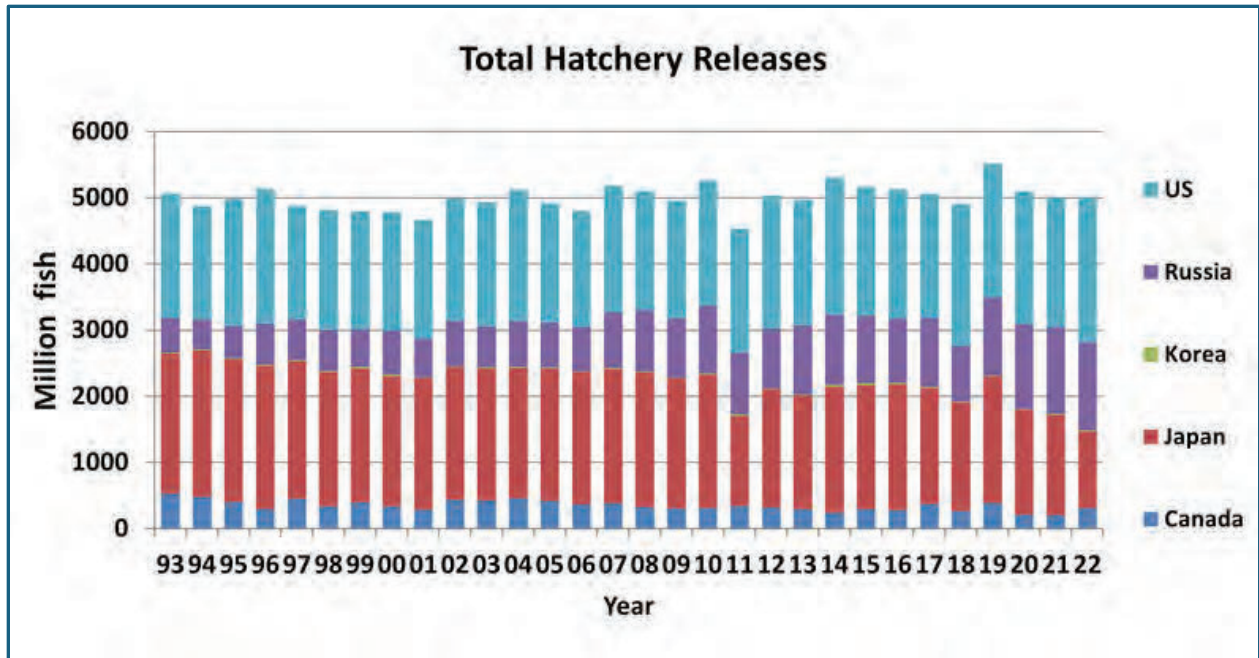


Figure 16. Annual hatchery releases of salmon and steelhead from Russia, Japan, U.S., Korea, and Canada by species in millions of fish, 1993-2022, NPAFC

Bottom line: pink salmon abundance may be a contributing, regional stressor to chum and sockeye—especially in enclosed or highly productive rearing areas or in poor-productivity years, but it is not the primary, statewide cause of Chinook declines.



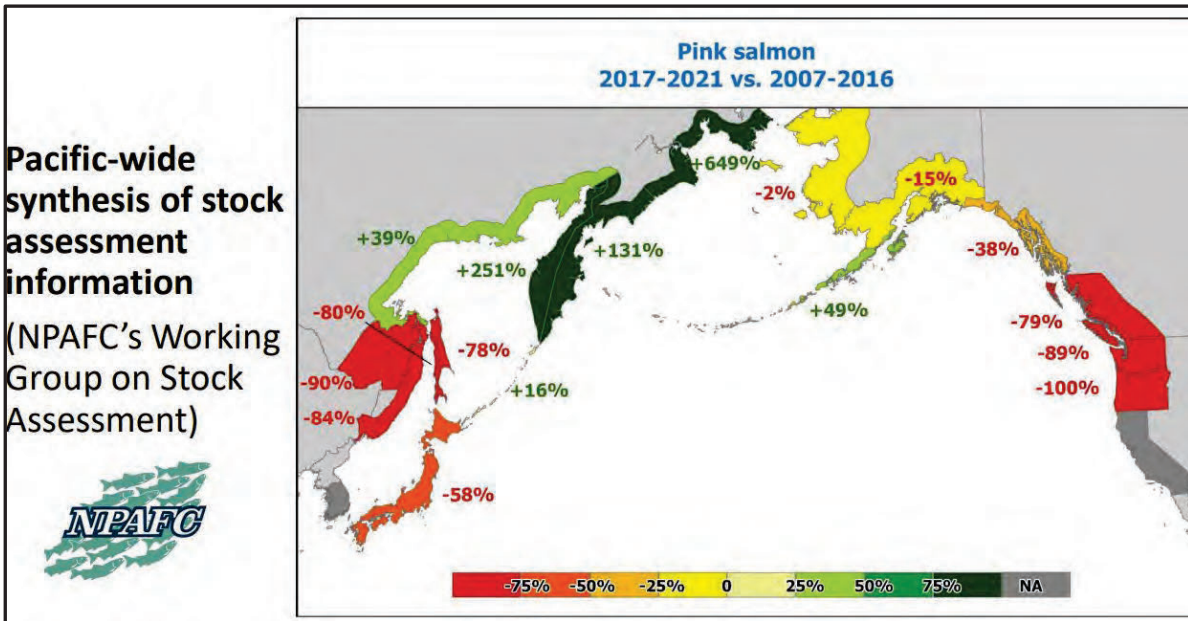


Figure 17. Pacific ocean productivity is not a fixed value, but rather a dynamic interplay of environmental factors such as water temperature, upwelling, sea ice, El Nino, La Nina, Pacific gyre, among others, and biological factors such as primary and secondary productivity, nektonic biomass such as squid, pollock and capelin. This graphic depicts pink salmon harvest and escapement from around the Pacific Rim 2017-2021 compared to 2007-2016. The northwest Bering Sea systems (Russian) recorded their highest returns ever in 2018, over two times Alaska's record year in 2011. Note the Alaska Peninsula is doing relatively well compared to the rest of Alaska in the past seven years. In the past many scientists believed the Pacific Decadal Oscillation, a 20 to 30 year periodicity phenomenon, drove productivity, sometimes favoring the Pacific Northwest while Alaska suffered, and then flipping to favoring Alaska.

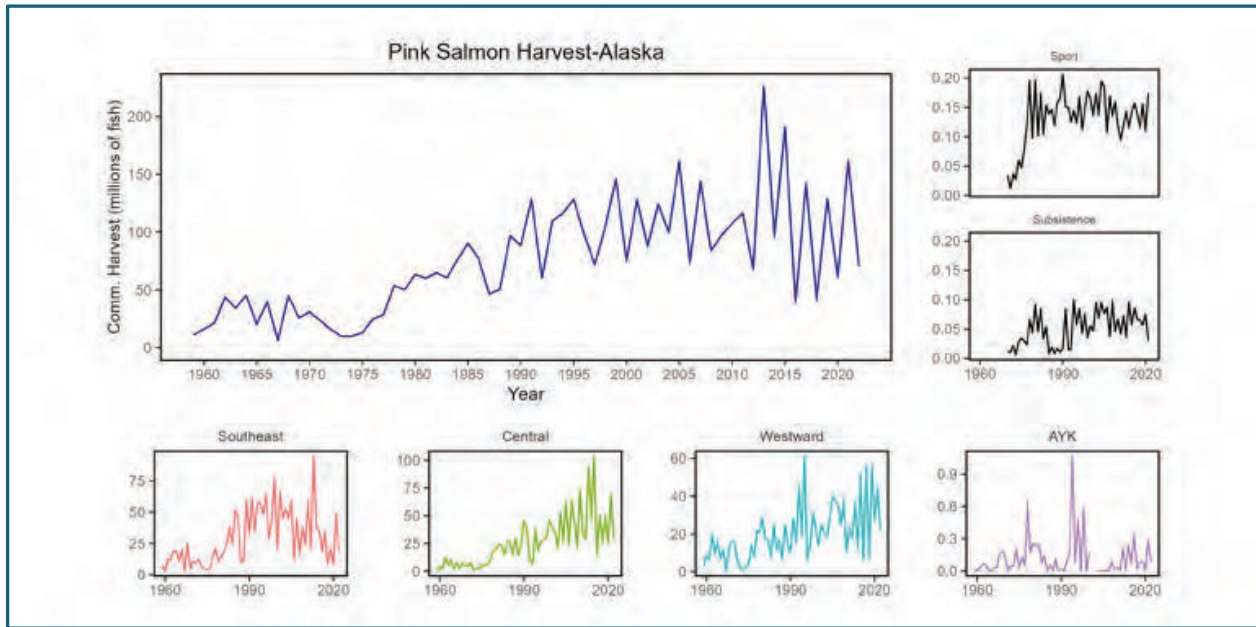


Figure 18. Number (millions) of pink salmon harvested in Alaska (1959-2023 as reported annually to NPAFC). Series include total commercial harvest (main panel), commercial harvest for ADF&G Commercial Fisheries Region (lower panels), and sport and subsistence harvest through 2021 (side panels). Note change in scale of Y-axis. Data source: ADF&G, adapted from NPAFC (2023). Odd-even year pattern evident in most years, odd-year 2013 record

A modeling study by Ruggerone and Connors (2015)<sup>102</sup> looked at the relationship between pink salmon abundance and the growth and survival of other salmon species, including Chinook, coho, and sockeye salmon. They found a correlative relationship that high pink salmon abundance can negatively impact the growth of these other salmon species during their critical early marine life stages. However, numerous researchers conducting empirical studies have found neutral and, in some cases, positive correlations with pink and Chinook salmon growth<sup>103</sup>.

<sup>102</sup> Ruggerone, G. T., & Connors, B. M. (2015). Productivity and life history of sockeye salmon in relation to competition with pink and sockeye salmon in the North Pacific Ocean

<sup>103</sup> Yasumiishi, E. M., C. J. Cunningham, E. V. Farley, L. B. Eisner, W. W. Strasburger, J. A. Dimond, and P. Irvin. 2024. Biological and environmental covariates of juvenile sockeye salmon distribution and abundance in the southeastern Bering Sea, 2002-2018

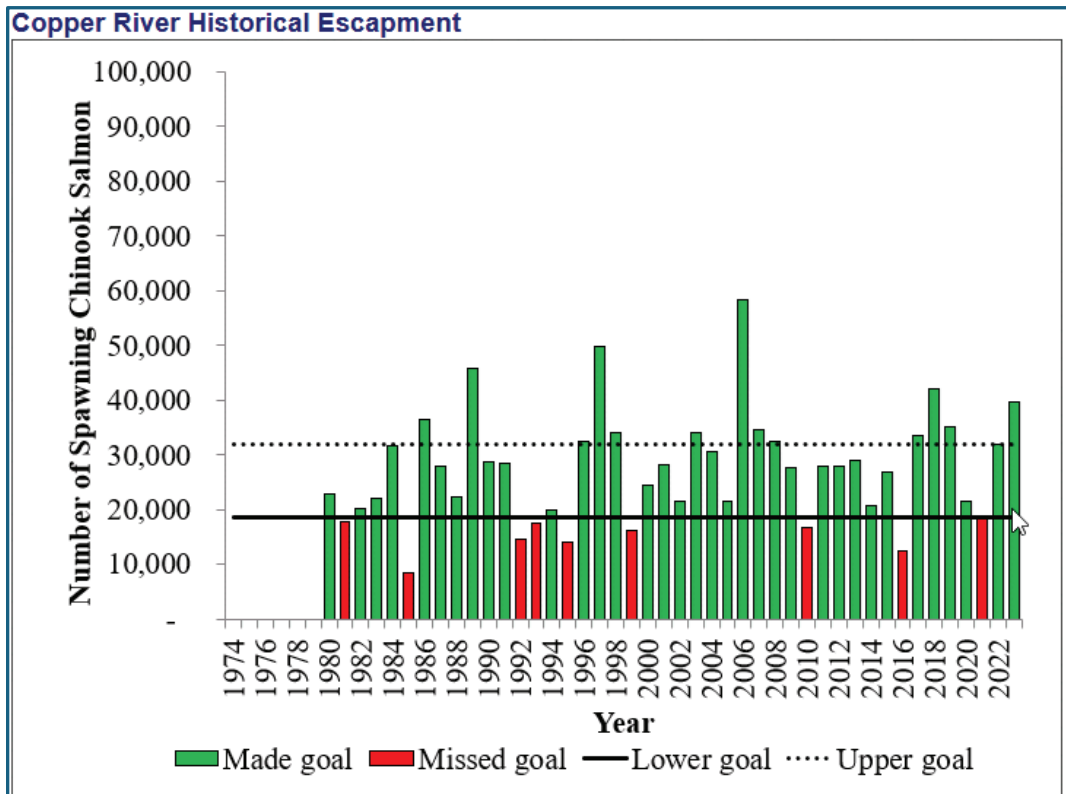
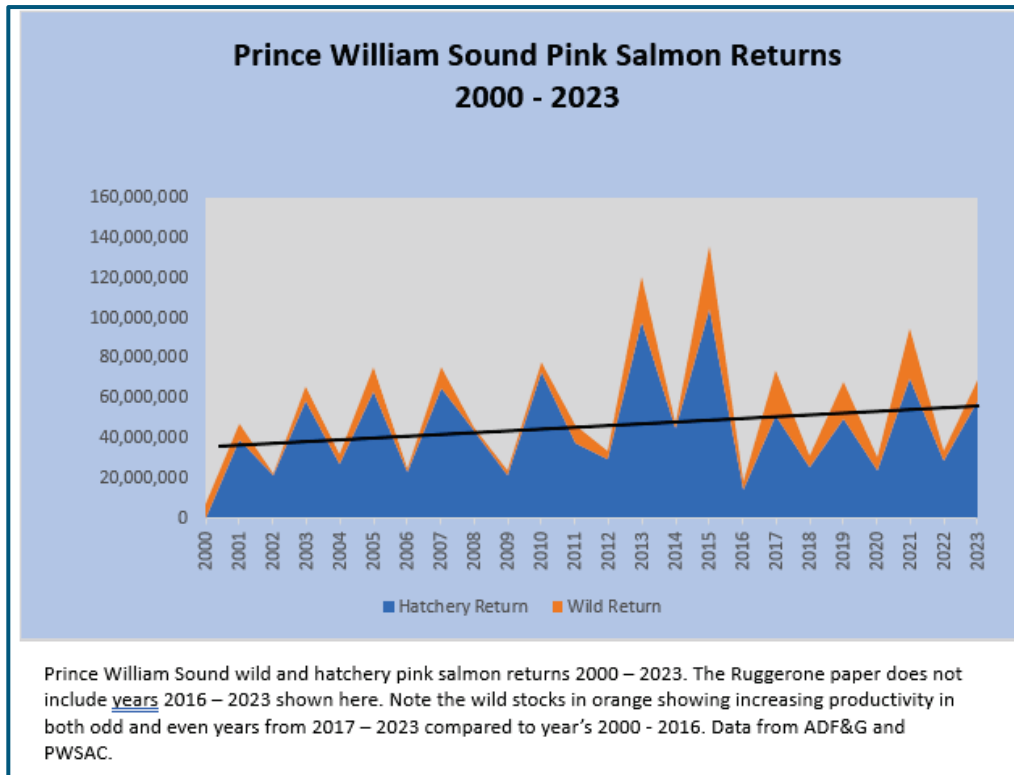


Figure 19. Copper River Chinook escapement from 1974 to 2023 showing most years within the escapement range goals. Escapements have averaged just over 29,500 Chinook salmon since 1999, near the upper escapement goal. Another 8,000 to 12,000 Copper River Chinook are harvested annually by all user groups.

The most proximate pink salmon enhancement programs in PWS were initiated in the 1970’s and at full production by 1990. Each spring wild and hatchery pink salmon fry biomass enters PWS and constitutes a large biomass compared to the Copper River spring Chinook smolt biomass. Copper River Chinook, as spring smolt, would be considerably larger in size, than two-gram pink salmon. There would be little diet overlap between pinks and Chinook at this stage as reported earlier. Furthermore, Copper River escapements since 1980 tell the story best pinks and Chinook comingle sustainably in PWS.



*Figure 20. Wild pink salmon in PWS are trending up especially compared to the early 2000's. Figure 9 on the previous page shows Copper River Chinook making the lower escapements goal for most years, coinciding with a decade of increasing pink productivity.*

The hypothesis by Ruggerone posits that juvenile pink salmon biomass, which tends to dominate the nearshore marine environment, may deplete the available prey resources through increased prey competition. If true this can lead to reduced growth and potentially lower survival rates for other salmon species, especially those that occupy similar ecological niches.

However, Wertheimer et al. 2018<sup>104</sup> in High Ocean Biomass states marine habitats of Chinook salmon related to depth distribution and migration patterns are diverse and often distinct from most other Pacific salmon. Juvenile Chinook salmon distribute deeper than coho and other juvenile salmon in their first summer and fall at sea (Orsi and Wertheimer 1995; Beamish 2011). Immature Chinook

<sup>104</sup>Wertheimer A. & Heard B., 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

salmon are associated with colder temperatures and deeper depths than other salmon species (Walker et al. 2007; Walker and Myers 2009; Riddell et al. 2018).

Marine diets of Chinook salmon are distinctly different than diets of pink, chum, and sockeye salmon and more similar to coho salmon (Brodeur et al. 2007; Riddell et al. 2018). Juvenile (first-ocean year) Chinook salmon in coastal waters initially have highly varied diets composed of fish, zooplankton, and insects, then become predominately piscivorous in coastal habitats (Brodeur et al. 2007).

ADF&G summed up a well-documented alternative view from Ruggerone in their letter to WFC<sup>105</sup>:

*“Life history theory predicts slower growth and later age at maturity in prey limited situations, such as found for Japanese chum salmon in the North Pacific (Morita et al. 2005), the opposite of the observation that Chinook salmon are maturing at younger ages. Increased abundance of pink salmon is a commonly posited mechanism for reduced growth and productivity in salmon (e.g., Buckner et al. 2023; Ruggerone and Goetz 2004). However, in the Gulf of Alaska, juvenile, immature, and maturing salmon growth and condition have been shown to be driven by bottom-up forces in the ocean, meaning that fluctuations in the primary productivity, not the abundance of other salmon species, would limit juvenile fish growth (Daly et al. 2019b). During 2012 and 2013, there was no bottleneck in the prey resource for pink, chum, and sockeye salmon (Daly et al. 2019a), demonstrating that these species were **not competing for resources with Chinook salmon**. During 2015–2016 when top-down pressures were thought to have controlled forage fish abundance in the northern Gulf of Alaska, the rearing area for many Alaska Chinook salmon populations (Larson et al. 2014), (including pink salmon) were not the suspected cause (Arimitsu et al. 2021). Estimates vary among Alaskan populations, but Oke et al. (2020) used length declines from many populations and fecundity data from two time points (1986 and 2005) from one river (Yukon; Jasper and Evenson 2006) to estimate the median reduction over the last 30 years in eggs-per-female for Chinook salmon at 15%, statewide. Even if egg deposition declined 15%, escapement goals designed to ensure high fisheries yields would be ample to maintain reproductive output well above levels that might threaten population viability.”*

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<sup>105</sup> State of Alaska letter September 6, 2024 Request for information, 90-Day Finding on a Petition to List Gulf of Alaska

Research conducted during International Year of the Salmon (IYS) and earlier Russian studies provide additional understanding of the complex interactions between pink salmon and other salmon species, as well as the overall ecosystem-level effects.

For example, Shuntov and Temnykh (2011)<sup>106</sup> argued that the ocean carrying capacity for Pacific salmon is not necessarily fixed, and that the ecosystem can potentially support higher total salmon abundance, including both pink and other salmon species. They suggested that the impact of pink salmon on other salmon may be more nuanced and context-dependent rather than simple competition for resources.

In a follow-up study, Shuntov et al. (2017)<sup>107</sup> further explored the trophic relationships among Pacific salmon in the Far Eastern seas and North Pacific Ocean. They found that while there is some dietary overlap among salmon species, the degree of competition varies depending on specific oceanographic conditions and food web dynamics. The Shuntov et.al. paper was conducted during the juvenile pink salmon rearing year for the record 500 million 2018 Russian return.

A study by Kaeriyama et al. (2012)<sup>108</sup> found that Chinook and pink salmon have relatively limited dietary and depth niche overlap in the North Pacific Ocean, indicating that direct competition for resources may not be a significant factor. This suggests that the potential impacts of pink salmon on Chinook salmon may be more complex and mediated through indirect, ecosystem-level interactions.

von Biela et al. (2020)<sup>109</sup> looked at the importance of habitat quality indicators at Knik River, Alaska, including redd superimposition (density of salmon nests), water temperature, and stream flow. These indicators were used to assess the quality of spawning habitats for Chinook salmon. The researchers also looked at indicators of early marine habitat quality, such as sea surface temperature and upwelling, to understand the influence of these factors on juvenile Chinook salmon including juvenile abundance, size, and condition. The study found that indicators of spawning habitat quality

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<sup>106</sup> Shuntov, V. P., & Temnykh, O. S. (2011). Concerning modern concepts of the role of Pacific salmon in the ecosystems of the far eastern seas and the north Pacific Ocean.

<sup>107</sup> Shuntov, V., O. Temnykh, and O. Ivanov. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon (*Oncorhynchus* spp.).

<sup>108</sup> Kaeriyama, M., Seo, H., Kudo, H., & Nagata, M. (2012). Perspectives on wild and hatchery salmon interactions at sea, potential climate effects on Japanese chum salmon, and the need for sustainable salmon fishery management reform in Japan

<sup>109</sup> von Biela, V. R., Scheuerell, M. D., Buhle, E. R., & Hinton, S. E. (2020). Habitat metrics indicate juvenile Chinook salmon are more limited by degraded spawning habitats than early marine conditions

as outlined above were more consistently related to juvenile Chinook salmon abundance, size, and condition than indicators of early marine habitat qualities.

These results suggest that juvenile Chinook salmon in the Knik River system are more limited by degraded spawning habitats than by early marine conditions. This has important implications for understanding the key factors driving Chinook salmon productivity in Alaska. Overall, this study provides valuable insights into the relative importance of freshwater versus early marine habitat quality for juvenile Chinook salmon.

Finally, the international organization North Pacific Anadromous Fish Commission with a membership consisting of Canada, Japan, United States, Korea and Russia states in TECHNICAL REPORT 21 Review of Pink Salmon in the Pacific, Arctic, and Atlantic Oceans, 2023:

“Pink salmon spend approximately 18 months growing and rearing in the ocean but only weeks to a few months in freshwater before migrating to the ocean..... The ecosystem consequences of interactions between expanding numbers of pink salmon, especially in certain years (as odd- and even-numbered years have different pink salmon abundances, depending on the geographic area), and other aquatic species **remains a topic of scientific debate**. Further research is needed, especially as pink salmon access new areas where effects may differ from those in areas of traditional occupancy. In the ocean, pink salmon overlap in diet with many other species of fish and high abundances of pink salmon can deplete food resources. When numerous, pink salmon may affect the growth or mortality of non-salmon species, including fish, seabirds, and marine mammals, due to potential competition for zooplankton and other prey species. **However, the ocean remains highly productive and pink salmon only consume a small fraction of the resources compared to more abundant species (e.g., walleye pollock)**. Pink salmon are also flexible foragers, eating a variety of prey and finding preferred feeding areas best suited to their traits. Indeed, the foraging areas and feeding habits among Pacific salmon species often indicate **complimentary, rather than competitive, interactions.**”

The weight of empirical evidence from international scientists, NOAA Fisheries, the NPAFC, and ADF&G indicates that pink salmon—whether wild or hatchery-origin—are not the primary driver of Alaska Chinook declines. Multiple, independent lines of research point to a suite of stronger, geographically variable stressors: pervasive freshwater heat stress in western and interior Alaska; rising selective mortality from apex predators (notably resident killer whales, salmon sharks and pinnipeds) that disproportionately remove older, larger Chinook; long-standing, large-scale

productivity cycles; rapid loss of Bering Sea ice and recurrent marine heat waves; and shifts in ocean prey communities that reduce early marine growth and overwinter survival.

Taken together, these factors—acting across life stages and interacting in complex ways—better explain the widespread reductions in size-at-age, age at maturity, and cohort strength observed from Ketchikan to Kotzebue. Pink salmon may contribute locally or episodically to competition or trophic change, but the preponderance of data supports a multifactorial, climate- and predator-driven explanation for Chinook declines. The implication for management is clear: effective recovery strategies must address the multiple oceanic and freshwater drivers simultaneously, prioritize region-specific vulnerabilities (for example, interior river thermal stress and predator impacts), and integrate continued monitoring and adaptive actions rather than focusing narrowly on pink salmon abundance.

Pink salmon's success reflects their ecological plasticity: broad environmental tolerances, rapid life cycle, and relatively low natal-stream fidelity let them exploit changing ocean and coastal conditions more readily than other salmon species. That plasticity is an evolutionary advantage—enabling large, fast-responding populations—but it also fuels concern, because booming pink runs can amplify visible ecosystem changes and prompt questions about impacts on co-occurring species. In short, their adaptability is both the trait that makes them resilient under rapid change and the reason they are often singled out in debates about marine-ecosystem dynamics.

A final note of optimism: most Chinook stocks are meeting escapement goals across the state, and the number of "stocks of concern" is declining. Natural swings in ocean productivity are beginning to favor the North Pacific, and several Southeast Alaska stocks (Chilkat, Unuk, Chickamin) have recently been removed from the stocks-of-concern list, with more recoveries possible in the coming years. The Kenai River Chinook met its escapement goal in 2025. These improvements show that when effective management, intact habitat, and favorable ocean conditions align, Chinook populations can rebound.



## 9. Conclusions

Chinook salmon declines across Alaska reflect a multifaceted complex in which interacting oceanic, freshwater, and biotic factors combine to reduce cohort strength, body size, and age at maturity. High-seas surveys from the International Year of the Salmon and NOAA Fisheries document spatial heterogeneity in condition and prey fields, with Gulf of Alaska Chinook generally exhibiting lower energy densities than conspecifics in more western regions. Early marine growth—size attained by the end of the first summer at sea—emerges consistently as a key determinant of overwinter survival and cohort productivity, and is tightly linked to temperature, prey availability and composition, and timing of ocean entry.

Concurrent trends include widespread declines in size-at-age and shifts toward younger age at return (notably increased proportion of 4-year-olds), with attendant reductions in per-spawner fecundity and population resilience. Counterintuitively, two-ocean Chinook have not declined in size. Evidence indicates these trends are driven by multiple interacting mechanisms rather than a single cause: extreme marine heating and altered prey communities; deleterious freshwater conditions (reduced streamflow at spawning, increase autumn rearing streamflow, spawner size, release of sequestered heavy metals, ice sheet timing); and biological interactions most particularly predation. Apex predators and pinnipeds have increased regionally and can exert substantial consumptive pressure; model and empirical studies implicate predator-driven mortality as an important contributor to total Chinook removals alongside reduced human harvest. Competition hypotheses, particularly those implicating pink salmon and hatchery production remain regionally variable and are not uniformly supported by empirical data. Hatchery pink salmon are a small biomass compared to wild pinks, and miniscule compared to total nektonic biomass.

Advances in observation and analytical tools (high-resolution oceanography, telemetry, acoustics, genomics, eDNA, and tagging) are beginning to resolve spatially explicit links among ocean conditions, prey fields, predator dynamics, and Chinook life histories. To disentangle causal pathways, it is essential that integrated long-term ocean and near-shore surveys continue to couple predator dynamics, prey community assessment, and freshwater metrics.

## Stocks of Concern (as of February 2025)

System	Species	Area	Year Designated <a href="#">[a]</a>	Level of Concern	Year Last Reviewed <a href="#">[b]</a>
Chilkat River	Chinook	Southeast	2017	Delisted	2024
King Salmon River	Chinook	Southeast	2017	Management	2024
Unuk River	Chinook	Southeast	2017	Delisted	2024
Stikine River	Chinook	Southeast	2021	Management	2024
Andrew Creek	Chinook	Southeast	2021	Management	2024
Chickamin River	Chinook	Southeast	2021	Delisted	2024
Taku River	Chinook	Southeast	2021	Management	2024
Chuitna River	Chinook	Cook Inlet	2010	Management	2023
Theodore River	Chinook	Cook Inlet	2010	Management	2023
Alexander Creek	Chinook	Cook Inlet	2010	Management	2023
East Susitna River	Chinook	Cook Inlet	2019	Management	2023
Kenai River (late run)	Chinook	Cook Inlet	2023	Management	2023
Karluk River	Chinook	Kodiak	2010	Management	2023
Ayakulik River	Chinook	Kodiak	2019	Management	2023
Chignik River	Chinook	Chignik	2023	Management	2022
Nushagak River	Chinook	Bristol Bay	2022	Management	2022
Yukon River	Chinook	Yukon	2000	Yield	2022
Norton Sound Sub-district 5 & 6	Chinook	Norton Sound	2003	Yield	2022

[\[a\]](#)Indicates start of Alaska Board of Fisheries cycle in which Stock of Concern was designated (e.g. 2024/2025 BOF cycle = 2024).

[\[b\]](#) Indicates start of Alaska Board of Fisheries cycle in which Stock of Concern was last reviewed (e.g. 2024/2025 BOF cycle = 2024).

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March 2, 2026

**To: The Alaska Board of Fisheries**

**Re: Comments on Proposal 186 Central District Drift Gillnet Fishery Management Plan**

We respectfully request that the Board decline to adopt Proposal 186 during this out-of-cycle meeting and instead address this issue during the next regular Upper Cook Inlet (UCI) cycle in 2027.

Proposal 186 does not arise from a sudden conservation emergency or a newly discovered biological crisis. The concerns cited in support of this proposal, incomplete coho escapement counts at the Deshka and Little Susitna weirs, environmental conditions affecting weir operations, and changes associated with the federal EEZ drift gillnet fishery, are not new or unforeseen developments.

The operational challenges at both the Deshka and Little Susitna weirs have been well documented for multiple years. High July water temperatures, delayed fish movement, late-summer rain events, and flooding have repeatedly interrupted weir operations and resulted in incomplete counts. These monitoring limitations were present during the last UCI cycle and were known to the Department and the Board. They do not represent a new biological event warranting out-of-cycle regulatory action.

The recent federal administration of the EEZ drift gillnet fishery does not constitute an unforeseen effect under the Board's out-of-cycle criteria. Prior to 2024, those same EEZ waters were harvested under State management, and the sockeye harvest from those areas was included in total harvest calculations used for management decisions, including application of the drift gillnet one-percent rule. The recent shift in regulatory oversight did not introduce new harvest areas, new fishing efforts, or new biological impacts. It represents a change in administrative authority, not a new conservation circumstance or an unforeseen management consequence.

Proposal 186 would impose significant area-based commercial fishing restrictions that carry clear allocative implications. Issues of allocation and long-term management structure are precisely the types of matters intended for full consideration during a regular UCI meeting, where all stakeholders can participate and the Board can review comprehensive data.

While coho escapement concerns should continue to be monitored carefully, the Department retains existing in season management authority to respond to conservation needs through emergency orders. There is no demonstrated crisis requiring immediate regulatory restructuring outside of the normal cycle.

For these reasons, we respectfully request that the Board defer action on Proposal 186 and consider the matter during the 2027 Upper Cook Inlet regular meeting, where it can be fully evaluated within the proper management and allocative context.



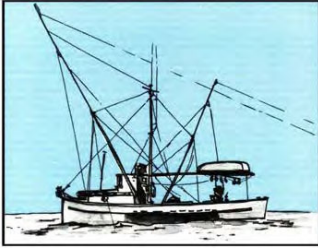
Norm Darch  
Executive Director

**Submitted by:** Dustin Slinker  
Alaska Sport Fishing Association  
**Community of Residence:** Anchorage

Proposal 186

A great number of the members of the Alaska Sport Fishing Association have enjoyed many years of fishing the Matsu Valley Drainage of the Northern Cook Inlet for wild Chinook and Coho Salmon. Wild salmon continue to struggle to make their way to the Northern Cook Inlet Drainages. We truly hope the board will act in favor of proposal 186 and allow wild salmon stocks to return to the Northern Cook Inlet. The below escapements goals over the past three seasons for coho should be alarming enough.

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**Alaska Trollers Association**

130 Seward #205  
Juneau, AK 99801  
(907) 586-9400  
alaskatrollers@gmail.com  
www.aktrollers.org

March 2, 2026

Art Nelson, Executive Director  
Honorable Board of Fisheries Members  
Alaska Board of Fisheries  
333 Raspberry Road  
Anchorage, AK 99518-1565

Re: Comments on the Statewide Finfish and Supplemental Issues

Dear Mr. Nelson and Honorable Board of Fisheries Members,

Please find the comments below from the Alaska Trollers Association (ATA) for the Statewide Finfish and Supplemental Issues meeting scheduled for March 17 – 21, 2026. ATA represents the trollers who participate in the small boat Southeast Alaska fishery in an area that stretches from Dixon Entrance to Cape Suckling. Trollers catch one salmon at a time, and pride themselves in delivering the highest quality salmon on the market. The troll fleet is a major economic contributor in Southeast Alaska as 85% of our permit holders are Alaska residents. Our fishery supports many Alaskan families who reside in small towns where there are few other opportunities and ATA is proud to have represented the troll fleet since 1924.

Thank you for your time and consideration of our comments,

Patrick Baum

President, Alaska Trollers Association

**Proposal Comments**

<u>Proposal</u>	<u>ATA position</u>	<u>Comments</u>
170	oppose	<p>ATA opposes this proposal for the reasons described below and urges the Board of Fisheries members to oppose the proposal or take no action.</p> <p>This proposed cut to hatchery production is not based on scientific evidence and instead relies on a heavily speculative correlation. At three recent Board of Fisheries meetings no action was taken on similar proposals. The proposer offers no justification for the reduction or explanation of the expected outcome with such a cut to hatchery production.</p> <p>Reducing hatchery chum production will have significant negative economic consequences for all user groups, processors and communities in Southeast Alaska. The cut to pink and chum production will impact opportunities for trollers to harvest these species and limit the ability of hatcheries to produce other important species like coho and king salmon because there will be less revenue available from cost recovery to support these programs. This reduction would make it more difficult for trollers to make a living, driving more permit holders out of business.</p>
176, 177, and 178	oppose	<p>ATA opposes these proposals and encourages the Board of Fisheries to do the same.</p> <p>These proposals would result in an increased harvest of king and coho salmon which are critical for us to make a living as trollers. Some fishermen are better at catching fish than others and these proposals would allow the good fishermen to harvest the fish for others on the boat that are otherwise unable to catch their bag limits.</p> <p>These proposals are authored by charter industry stakeholders and in Southeast Alaska this sector harvests a large portion of the sport fishing allocation of king salmon. The growth of this sector in recent years has resulted in the sport fishery exceeding their allocation several times. It has also resulted in the reallocation of king salmon from the commercial troll fishery to the sport fishing allocation at the recent Board of Fisheries meeting in Southeast Alaska.</p>
179	oppose	<p>ATA opposes a statewide annual limit on king salmon because it does not work in Southeast Alaska. In Southeast Alaska our king salmon quota is based on an allocation set through the Pacific Salmon Treaty process. The department sets annual harvest limits based on the overall quota. Furthermore, in Southeast Alaska an angler cannot retain a king salmon under 28 inches.</p>



**Proposal Comments Continued – Alaska Trollers Association**

<b><u>Proposal</u></b>	<b><u>ATA position</u></b>	<b><u>Comments</u></b>
180	oppose annual limit / support reporting requirement	ATA opposes a statewide annual limit on king salmon because it does not work in Southeast Alaska with our obligations under the Pacific Salmon Treaty. However, we do support the requirement to e-report king salmon harvest or requirement to submit an annual sport fishing harvest record for king salmon to ADF&G. We need better, real-time data on king salmon harvested in the sport fisheries so we can improve the management of our king salmon fisheries.
181	support	ATA supports the department's proposal to update the definition of sport fishing gear so that there is less confusion and the definition is aligned with statute.
183	support	ATA supports the department's proposal that allows sport fishing regulations and bag limits to be easily enforced. Allowing someone to mutilate a fish to avoid a citation is unfair to other users and this practice should be prohibited as it will be if this proposal passes.
184	support	ATA supports the department's proposal to update the sport fishing definition of rockfish so that it is consistent with the definition that is used in the commercial and personal use fisheries. This makes sense from a management perspective.



**Alaska Whitefish Trawlers Association**

PO Box 991 | Kodiak, Alaska 99615  
Ph: (907) 654-9888 | <http://www.alaskawhitefishtrawlers.org>

March 2, 2026

Alaska Board of Fisheries  
Board Support Section  
ATTN: BOF Comments  
P.O. Box 115526  
Juneau, AK 99811-5526

*Submitted via online portal*

Re: Opposition to Proposals 11, 163, 164, 165

Dear Chair Van Carlson-Van Dort:

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based association representing commercial harvesters that fish for pollock, Pacific cod, rockfish, flatfish, halibut, sablefish, Tanner crab, and tender for salmon. AWTA businesses are family-owned and operated commercial fishing businesses, and most of our vessel owners, captains, and crew live in Kodiak with their families. Fish caught by AWTA members is primarily delivered to shore-based plants in Kodiak, helping to make Kodiak a top-ten commercial fishing port in the U.S.<sup>1</sup> that relies on a diverse mix of fisheries, including trawl groundfish, salmon, crab, halibut, and sablefish. Trawl fisheries generally operate throughout the year and deliver enough landings to keep shore-based processing plants operating, which provides a place for all gear types and fisheries to deliver.

**AWTA Opposes Proposals 11, 163, 164, and 165**

**Proposal 11** seeks to close all waters of Alaska west of 170° W. longitude to commercial groundfish fishing with nonpelagic and pelagic trawl gear. AWTA members rely on trawl fisheries and oppose any proposal that categorically shuts down trawling in areas currently open to trawl gear. This proposal does not identify actual problems caused by trawling, relying instead on innuendo and inaccurate assumptions rather than science. This approach hurts the Alaska seafood brand and all Alaskan commercial fisheries. The Alaska Department of Fish and Game (Department) Staff Comment report<sup>2</sup> itself says negative impacts from trawl gear to golden king crab seafloor habitat are merely **implied**, and that potential benefits stemming from this proposal are largely unknown and difficult to assess<sup>3</sup>. In other words, there is no actual and known reason to close this area to trawling, and if the closure is put in place there will be no way to tell if it “worked.” In the meantime, Alaskan fishermen using trawl gear will lose fishing area and opportunity.

<sup>1</sup> NOAA Fisheries, *Fisheries of the United States 2023*

<sup>2</sup> Alaska Department Of Fish And Game Staff Comments On Commercial Regulatory Proposals Committee Of The Whole For The Alaska Peninsula, Aleutian Islands, Bering Sea, And Chignik Pacific Cod Alaska Board Of Fisheries Meeting Anchorage, Alaska, October 30–31, 2025 (Staff Comments)

<sup>3</sup> Staff Comments at page 53

AWTA Comments to Alaska BOF March 17-21, 2026 meeting  
March 2, 2026  
Page 2 of 3

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The proposal also glosses over the fact that extensive protected areas already exist within state-waters in the Aleutian Islands District west of 170. Table 29 in the Staff Comments<sup>4</sup> shows the already small amount of area currently open to trawl gear, ranging from 6% to 38%. What is not as clear from Staff Comments is that impacts from this proposed closure will fall predominantly on small Alaska-based trawlers who generally need to operate closer to shore because they are smaller, and deliver to shore-based plants. In addition, the community of Adak has been working to re-open its processing plant and closing this area to trawl gear is going to hurt that effort by limiting fleets that have historically delivered to Adak. We are not suggesting this proposal should only be applied to the larger trawl catcher-processors, catcher-processors maintain and expand markets for Alaskan seafood and smaller operations benefit from this activity. Proposal 11 has no documented or known benefits, and if approved it will hurt Alaskan coastal communities and Alaskan fishing businesses.

Most members of the trawl catcher-processor and Golden King Crab fleets fishing in this area have been actively working together to improve communication and avoid gear conflicts. It is not clear that the F/V Alaska Trojan<sup>5</sup> has been participating in this collaborative effort. Crab bycatch by trawl catcher-processors is low, with Table 30 in Staff Comments showing zero crab bycatch in four out of six years between 2020-2025<sup>6</sup>. We encourage the Board to allow the existing communications and voluntary collaboration between the fleets to continue, rather than imposing a closure that will hurt Alaskan communities and fishing businesses.

**Proposals 163 and 164** would establish a new presumption that all trawl gear operated in state waters is bottom-contact gear, and require the Department to approve (currently non-existent) monitoring technology that could prove absence of bottom contact to rebut the presumption. There are multiple problems<sup>7</sup> with this approach, but primarily these proposals as drafted would impose an impossible compliance standard, require technology that does not exist, and essentially shut down trawl in state waters. AWTA members rely on trawl, as do communities like Kodiak, Sand Point, and Unalaska, and we strongly oppose both of these proposals.

There seems to be an assumption that trawlers operating in the Gulf of Alaska (GOA) and Prince William Sound (PWS) regularly put their pelagic nets on the bottom. This is not accurate. The seafloor in the GOA and PWS are rocky, and our pelagic nets are relatively delicate. Contact with the bottom (or sunken ship wrecks) shreds our nets, requiring time-consuming and expense repairs

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<sup>4</sup> Staff Comments at page 50, Table 29

<sup>5</sup> Proposal 11 notes that it was submitted by Linda Kozak on behalf of the F/V Alaska Trojan

<sup>6</sup> Staff Comments at page 44 Table 30. There was no crab bycatch in 2020, 2022, 2023 or 2025, and one crab caught as bycatch in 2024. In 2021 there were 396 crab caught as bycatch, making the average across the six-year period 66 crab per year.

<sup>7</sup> These proposals also seem to rely on the assumption that all trawl gear, and impacts therefrom, are the same, which is not accurate. Pelagic, (or midwater) trawl gear is very different from bottom gear, is designed to operate differently in the water column, and it does not make sense to conflate the two. The way trawl gear behaves in the water also depends on vessel towing speed, trawl doors and how they are configured, type and configuration of trawl net, currents, tide and more. The proposals seem to assume a gear standardization that does not currently exist.

AWTA Comments to Alaska BOF March 17-21, 2026 meeting  
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or replacement, and lost fishing time. On average a pelagic trawl net alone for our members costs \$110,000, and we are not going to intentionally damage an expensive piece of gear.

**Proposal 165** asks the Department to establish criteria for salmon excluder devices and maintain a list of approved excluders. The proposal itself demonstrates a lack of understanding and collaboration with trawl operations. First, salmon excluder devices are already widely used in both Bering Sea and Gulf of Alaska pollock trawl operations. Secondly, we do not go to the trawl gear store and buy standard off-the-shelf nets; every trawl operation has a different gear setup that works for that particular vessel. Excluders that work in the Bering Sea on Bering Sea trawlers do not function the same in GOA trawl operations. As a result, it would be difficult to develop and maintain a list of “approved excluders” as outlined in Proposal 165- that is simply not how trawl gear works. The technology of excluders is also continually evolving and improving, and it would be unfortunate to delay implementation of more effective excluder devices simply because they are not on a list. Getting an excluder added to this list will require time-consuming field testing, as per the proposal, as well as an indeterminate approval process, and ultimately slow innovation.

Finally, we note that trawl fisheries off Alaska are subject to extensive management measures and habitat protections through federal management, including identification and protection of Essential Fish Habitat through a rigorous and peer-reviewed scientific process. We support sustainable management of all of Alaska’s fisheries, provided management is science-based and supported by actual data and information, not just inuendo and implications.

Thank you for the opportunity to comment.

Sincerely,



Patrick O'Donnell, President  
Alaska Whitefish Trawlers Association  
Owner/Operator of F/V Caravelle

**Submitted by:** Frances Alderson

F/V Ocean Cape

**Community of Residence:** SITKA

Dear Chair Carlson Van-Dort and Board members,

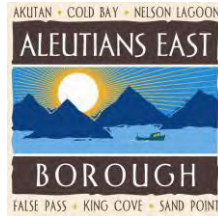
I am a 30 year resident of Sitka, Alaska and I've been personally and financially invested in Alaska's commercial fisheries since 1986. I am writing to express my support for proposals 163,164 and 165. These three proposals place reasonable requirements on pelagic trawl fisheries. Alaska fisheries across the board have had to adhere to updated monitoring requirements. It is onerous and expensive but it is necessary. If we all want to be able to keep fishing we ALL need to invest in the developing technologies that allow us to harvest our resources in the most sustainable manner possible. Fishermen don't like change. You know that. But if the industry is going to continue to develop new aggressively effective ways of harvesting fish, we need an investment in accountable monitoring as well. Please support proposals 163,164 and 165.

Thank you for your time,

Frances Alderson

F/V Ocean Cape

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March 2, 2026

Alaska Board of Fisheries  
 Marit Carlson-Van Dort, Chair  
 Via email: dfg.bof.comments@alaska.gov

RE: Opposition to Proposals 163-165

Chair Carlson-Van Dort and Board Members,

The Aleutians East Borough is the municipality that represents the coastal communities of Akutan, King Cove, Sand Point, False Pass, Nelson Lagoon, and Cold Bay. **We would like to provide comments on our opposition to Proposals 163, 164, and 165.** The Borough and its communities are entirely fisheries-based economies; commercial fishing provides employment for residents, subsistence for families, and fish tax revenue to support community services. Though the Borough relies heavily on fish tax from salmon, taxes are also generated the rest of the year from other species such as pollock, cod, sablefish, and crab.

The Borough also has year-round residents that operate small <58' multi-gear vessels homeported in King Cove and Sand Point, that participate in pollock and Pacific cod trawl. The <58' trawl fleet has historically averaged 18 vessels, but has since dropped to 11 vessels in 2025, the lowest participation on record. These vessels deliver to shoreside processors in Sand Point and False Pass, where additional fish tax revenue is also generated for those communities. Operating these plants in the winter provides employment opportunities and economic activity, and the trawl fishery provides a critical level of volume needed for processors to provide markets for other lower volume fisheries.

By redefining all trawl gear as non-pelagic, **Proposal 163 is another attempt to oversimplify a complex problem, and circumvent all of the work currently happening to solve this exact issue.** Pelagic trawl gear is used for pollock, and bottom trawl gear is used for Pacific cod. These are two very different fisheries with very different gear that operate differently in the water and conflating the two is not an effective management strategy. This proposal is designed to set up the Alaska Department of Fish and Game (ADF&G) and the fishing fleet for failure. It outlines programs that ADF&G either doesn't have the authority to create or have the funds to pay for and doesn't yet have the tools to enforce. There is already a significant effort underway by industry and scientists through the North Pacific Fishery Management Council process to conduct gear innovation, further define trawl gear and develop meaningful enforcement based on evidence. An approach that considers the wide range of vessel size and type, gear used, area of operation, and behavior, all of which contribute to how, when and to what degree a vessel might have bycatch or contact the seafloor.

**As it stands, Proposal 163 and 164 would effectively shut down the small boat pollock trawl fishery in the Western Gulf of Alaska (WGOA), as the majority of the 58' fleet harvest comes from state waters.** While the majority of the pollock and Pacific cod trawl fisheries occur in federal waters, the area inside state waters is critically important, and nearly all of the state waters portion in the WGOA is from the <58' fleet, roughly 95% and 91% respectively across the 10-year average. The local WGOA fishermen rely on state waters for several reasons: as refuge in bad weather; as an area they can use to avoid bycatch; and to compete with larger vessels that have more options for fishing offshore. The majority of state waters are already closed to bottom trawling. One exception is the small area in the WGOA, where access is restricted to vessels that are <58', a [measure established in 2010 by the Board of Fisheries](#) to protect these small vessels who are fishing for Pacific cod.

For the same reasons as above, Proposal 164 is another “catch-all” provision that is not within the authority of ADF&G, provides no clear guidance on how such a costly program would be funded and maintained, and does not have currently achievable objectives. As a prior Principal Investigator of the WGOA trawl electronic monitoring project for federal fisheries, I am well aware of the immense scope and cost of implementing a monitoring program which took nearly 6 years to implement. The reason that program was successful, was by having full and voluntary support of the fleet, outlining the specific objective (EM for compliance with full retention requirements and counting and sampling onshore), determining data review protocols and costs, and thoughtfully designing a program that accounted for the nuances of different fisheries. This guaranteed the end result was a meaningful improvement that truly achieved the stated goal of monitoring and was usable by federal managers, not just a big brother surveillance tactic. Combined, these two proposals will put pollock vessels and fishery managers in a position to fail, effectively eliminating the pollock fishery for small boat fishermen in the WGOA.

Regarding Proposal 165, we are always in support of finding innovative tools to improve fishing practices. However, we are not in support of bluntly requiring a tool across all fisheries before it has been vetted for use in those fisheries. Salmon excluders are widely used, but they are often used on larger vessels with different horsepower and towing behavior than small vessels. It is unclear whether salmon excluders are actually effective for small vessels, and may perform worse than nets without excluders. Furthermore, the relative volume of pollock in large vessel trawl is much greater than that of a small vessel, so the impacts of pollock that leak from an excluder will be disproportionately worse for a small vessel. This is important for both the fishermen and meeting bycatch objectives, because pollock escaping in great number just mean the vessel is on the water fishing longer (not good for bycatch). Until it is demonstrated that salmon excluders are effective for all types of small vessels and don't exacerbate the problem, we cannot support forcing WGOA fishermen to bear this burden although some are continuing to explore, research and share viable options for small vessels on their own.

We recognize this a complex issue and it will require everyone working together to solve it in a meaningful way. These proposals may have good intentions, but they are not implementable. They will only serve to hurt the small local fleet, communities and Alaskans.

Sincerely,



Charlotte Levy, Fishery Analyst  
Natural Resources Department

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Pete Alexson. I have fished Kodiak for salmon for the past 38 years. I live year-round in Homer, Alaska, and I operate a seiner called the Nanvak.

I oppose Proposals 170, 171, and 172. In Kodiak, processors have struggled to stay afloat, with companies selling out or disappearing. Fish volume is vital to keep processors operating—without processors, there is no commercial fishery. Reducing hatchery production risks a devastating outcome for the processing sector and, as a result, for fishermen and coastal communities that depend on that infrastructure.

Living in Homer, I have seen what just two hard salmon seasons can do to a local economy. These proposals would compound instability and make recovery harder.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Pete Alexson  
Homer, Alaska (Kodiak fishery participant)

[REDACTED]



March 2, 2026

Dear Members of the Board of Fisheries:

My name is Grace Allan. I am a commercial fisherman, longtime community member of Kodiak, and small business owner. I operate the F/V Alyssa Claire.

I recently purchased my own salmon seiner after years of fishing in multiple fisheries. These proposals would make it feel as though the State of Alaska does not support young fishermen taking financial risk in an already challenging industry. Profit margins for new entrants are thin, and unjustified cuts to hatchery programs increase that risk significantly.

Kodiak depends heavily on salmon fishing. The summer fishery provides income that supports local businesses, schools, healthcare providers, and long-term residents. If adjustments to hatchery programs are necessary, they should be gradual and based on sound scientific evidence, not broad reductions without clear data.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Grace Allan  
Kodiak, Alaska



**Submitted by:** Amber Allen

**Community of Residence:** Willow, AK.

I support proposals 163, 164, 165, and 186. We have owned and operated a small sport fishing guide service in the Mat-Su Valley for going on 18 years now. It is imperative for the Board of Fish to pass proposals 163, 164, and 165, which will ban trawling in state waters in all Oceans in Alaska 3 miles from shore. Trawling is devastating the populations of salmon returning to Alaska rivers, especially the Mat-Su Valley and if something doesn't happen, the next generation is not going to get to fish for King Salmon or Coho Salmon. Proposal 186 restrictions central district commercial fishing from fishing a mixed stalk fishery, by making them fish further out where Red Salmon are more prone to migrate. This will allow more coho/silver salmon to return to the Mat-Su Valley rivers, In the passed 12 years, sometimes the central district commercial fisherman are able to catch 180,000 silvers in one day of fishing in these mixed stalk fisheries, when coho are supposed to be a sport use fish, by commercial fishing regulations.

**Submitted by:** Ben allen

**Community of Residence:** Willow, alaska

There needs to be additional conservation of fishery resources, the current management strategy and implementation is not working. My problem is the least impactful user groups are bearing the greatest burden. Restricting in river users has been a failed strategy. I haven't been able to harvest King salmon on willow creek since 2012. I live on Willow Creek full time. You are not allowed to even catch and release kings with a barbless hook on Willow creek, but nets are allowed to drag the bottom of the ocean within 3 miles of shore. Please pass 163,164 & 165.

The Cook Inlet commercial drift gill net fishery is an unsustainable fishery. This fishery has gotten out of hand with kenai sockeye escapement. The last truly good year of coho to the deshka and little Susitna was in 2018. Go figure the kenai red run was weak in 2018 and the central district didn't fish as hard. For the last several years management has blatantly disregarded the central district drift gillnet fishery management plan guidelines as outlined in page 21 of the regulation booklet. Proposal 186 if adopted, will put a plan in place that will allow all user groups to participate and have opportunity. I have lost track of the EOs closing and restricting the little su and deshka coho sportfishery, but nearly ever since 2012. It's a problem that's not going away unless additional conservation where the greatest consumption occurs ( central district). Fish where there is the greatest concentration of the fish you are targeting- not in the middle of Cook Inlet in a mix stock fishery.

Please adopt 186

**Submitted by:** Spencer Allen

**Community of Residence:** Homer, AK

Good afternoon,

My name is Spencer Allen. I have been an Area E drift gillnet permit owner and operator since 2003. I became an Alaska resident in 1990 and have also crabbed, long lined, seined all across the state. My son is also a fisherman and is trying to buy in. I am committed to sustainable and viable Alaskan fisheries. Below are my thoughts on the following proposals.

Proposal 170: I oppose proposal 170. This will have a negative impact on PWS hatcheries and lower the fish available for common property harvest. This will lead to a larger concentration of boats and increase pressure on wild stocks. Hatchery chum is a primary income source for myself and much of the fleet. A reduction will only harm my fishery with no known benefits.

Proposal 171: I oppose proposal 171. This proposal is open ended and does not have a clear directive. If passed it will destabilize the PWS hatcheries that are designed to support wildstocks and benefit all user groups. Wild and hatchery fish have been interacting for decades and there have been no negative effects.

Proposal 172: I oppose proposal 172. Pink and Chum production has been stable for years. This is too broad of a restriction and does not leave production levels to the ones best informed to make these decisions.

Proposal 187: I oppose proposal 187. This would shut down commercial fishing opportunities in an extremely remote and not fully utilized fishery. There is no conservation concern and fish and game already has the power to change the district lines to adjust for shifts in the river.

Other proposals :

I support Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear:;

I support Proposal 165 – Require salmon excluders for pelagic trawl gear:;

I support Proposal 174 – Seine vessel/skiff engine operation requirements:;

I support Proposal 175 – Dipnet mesh and configuration requirements: ,

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish:

Thank you for your consideration,

Spencer Allen

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PC25

**Submitted by:** Brenda Ambrose

**Community of Residence:** Ruby

Stop trawling in AK waters. AK constitution states resources to be protected and managed for residents/subsistence... not out of state enterprises or commercial interests. Kings and chums will either go extinct or can follow the turnaround seen in South America. I want my children to experience sport and subsistence fishing and expect leaders to protect these resources for future generations.

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PC26

**Submitted by:** Bethany and Luther Andersen

**Community of Residence:** Kasilof

STOP the destruction of the ocean ecosystem ! Trawlers are not sustainable and they destroy coral beds, kill marine Maness of all sizes, create wanton waste by discarding dead 'carbon ch' they don't want. For too long 'agencies' have turned a blind eye. This HAS TO STOP!

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kavik Anderson, and I am a commercial fisherman based in Kodiak, Alaska. I fish with the Katie Lady, Kestrel, and Cindria Gene.

I would lose opportunity to fish if hatchery production is reduced. These proposals would mean less fish across the dock and reduced opportunity for fishermen and communities that rely on consistent access to salmon.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kavik Anderson  
Kodiak, Alaska



**Submitted by:** Greg Arthur

**Community of Residence:** Anchorage

I would like to partially support and partially oppose Proposal 175 that would modify the definition of dip net mesh size and configuration. I support reducing the maximum mesh size to 3.5" in an effort to reduce entanglement of Chinook salmon. I also want to recognize that this does put an economic burden on participants of dip net fisheries given that everyone would need to invest in a new mesh bag for their dip net.

I strongly oppose changing the definition to exclude the use of a rope tied to a vessel that is participating in the dip net fishery. As written the proposal states that it avoids extending the functional length of the net handle. Unless someone's submerged the net handle and was holding it under the water, this is functionally impossible and doesn't make sense as written. Eliminating the use of a rope also significantly reduces the availability and access to this fishery to people with disabilities or who are smaller in stature. All Alaskans should have the opportunity to participate in this fishery and this proposed change to the gear type definition puts an undue burden on the residents of the state participating in this fishery.

Proposal 175 should be amended to only reduce the maximum mesh size from 4.5" to 3.5". The additional proposed language should be removed.

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**ASHBURN & MASON P.C.**

MATTHEW T. FINDLEY • LAURA (DULIC) FISHER • STEPHANIE X. HUANG  
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March 2, 2026

*Via BOF Online Submission Form*

Chairwoman Märit Carlson-Van Dort  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Public Comments of Ashburn & Mason, P.C., Counsel for Prince William Sound Aquaculture Corporation in Opposition to Proposals 170, 171, and 172 (Comment Due Date: March 2, 2026)**

Dear Chairwoman Carlson-Van Dort and Members of the Board of Fisheries,

Ashburn & Mason, P.C., counsel to Prince William Sound Aquaculture Corporation (“PWSAC”), submits the following opposition and public comments to the above-referenced proposals.

### **INTRODUCTION**

In anticipation of the March 2026 Statewide Finfish and Supplemental Issues Meeting, Proponents have submitted three proposals to the Board of Fisheries (“Board”)—Proposals 170, 171, and 172 (collectively, the “Proposals”)—related to limiting hatchery operations. These proposals are not new ideas—rather, they again seek to have the Board override and usurp authority belonging to the Alaska Department of Fish and Game (“Department”) regarding hatchery operations. The proposals are summarized as follows:

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- **Proposal 170:** Proponent asks the Board to “[r]educe the permitted egg take level of each hatchery permit containing pink and chum salmon by 25% of the current permitted capacity for those species.”
- **Proposal 171:** Proponent asks the Board to “[a]mend Prince William Sound hatchery permits to reduce pink salmon egg take capacity . . . sufficient to reduce straying into Lower Cook Inlet streams to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan.”
- **Proposal 172:** Proponent asks the Board to “establish[] a moratorium on any increase in egg take of [pink and chum salmon] . . . relative to permitted levels as of 2025” and to keep the moratorium in place until more conclusive scientific studies on hatchery-wild salmon effects could be done and hatchery policies could be updated.

In submitting these proposals, Proponents ask the Board to: (1) exceed its statutory authority and override the hatchery permitting decisions of the Department, which AS 16.10.440(b) expressly prohibits; (2) arbitrarily limit hatchery production without persuasive or credible evidence that doing so will result in any benefit, while the overwhelming evidence is that enacting these proposals will cause immediate and significant harm; (3) override the legislature’s express decision to support hatchery activities; (4) financially ruin hatcheries statewide; and (5) cause severe economic harm to all the permit holders, crew, businesses, and communities that rely on a healthy and robust

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commercial fishing industry in Prince William Sound (the “Sound” or “PWS”), Kodiak, and Southeast Alaska.

The comments here focus on the primary reason these proposals must be rejected—*the Board simply does not have the statutory authority to act on any of them.* To be clear, however, there is no current scientifically validated evidence offered in support of these proposals, and the studies these proposals claim are needed regarding hatchery-wild effects *are already underway.* Proponents—who have biased special interests—are simply conjecturing that released hatchery fish in Prince William Sound and Southeast Alaska are the cause of fisheries declines and closures *statewide*, including fisheries in Western Alaska hundreds of miles from the hatcheries in question. For example, there is no credible evidence that reducing pink and chum egg take levels by 25% would actually have a positive effect on Alaska wild salmon stocks (Proposal 170). The proposal simply suggests that the Board take action and see what happens. In addition, asking the Board to reduce egg take capacity to reduce straying to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan is unsupportable and implausible without further scientific study, as current scientific studies have not confirmed what levels of straying are detrimental to wild stocks (Proposal 171). Finally, placing a moratorium on any increases in pink and chum egg take levels to allow for completion of further scientific studies is unnecessary, as the Department already balances such considerations when it issues hatchery permits and directs further scientific study (Proposal 172).



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Putting aside all these scientific failings, again, *the Board lacks statutory authority to amend hatchery permits and override the permits issued by the Department in the manner advocated by Proponents.* As set forth in detail below, the legislature made an express policy decision to create and support a statewide hatchery system, and it invested the Department (not the Board) with the legal duty to oversee all aspects of hatchery creation, operation, and production,<sup>1</sup> including but not limited to how many fish hatchery operators are allowed to incubate and release each year. By statute, the Department, not the Board, regulates hatchery activities that directly impact production levels, such as the harvest of eggs from hatchery broodstock.<sup>2</sup>

The Board, on the other hand, is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve, including commercial, personal use, sport, subsistence, and hatchery cost recovery.<sup>3</sup> The Department and the Board have respected and abided by this division of labor and authority for over 35 years. To our knowledge, the Board has never before attempted to second guess a decision by the Department to authorize a specific level of egg take in a hatchery permit.

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<sup>1</sup> AS 16.10.400–.480; 5 AAC 40.005–.990.

<sup>2</sup> AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 AAC 40.840.

<sup>3</sup> *E.g.*, AS 16.05.251.

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The Proposals seek to disrupt this well-established division of authority by interjecting the Board into the realm of production management. Specifically, the Proposals ask the Board to limit or unilaterally reduce in an arbitrary and draconian fashion egg take levels from hatchery broodstock, which is squarely within the Department's sphere of authority and expertise, and outside the Board's jurisdiction over allocation of harvest levels.

Only one of the proposals, Proposal 172, cites any authority that would allow the Board to take the requested actions here, but both citations are inapposite. *First*, AS 16.05.251(a)(9) grants the Board authority to enact new regulations for "prohibiting and regulating the live capture, possession, transport, or release of native or exotic fish or their eggs." However, and importantly, *the same statute* further down in paragraph (f) notes that the Board "may *not* adopt regulations or take action regarding the issuance, denial, or conditioning of a permit under [the hatchery permitting statute], . . . [or] the construction or operation of a farm or hatchery . . ." (emphasis added). Thus, the Board may not rely on this statute to approve proposals regarding hatchery permitting and operations. *Second*, AS 16.10.440(b) only addresses the Board's limited authority to enact new regulations to amend hatchery permits regarding the "source and number of salmon eggs," so long as the regulation does not interfere with the Department's issuance or denial of permits required under AS 16.10.400. These provisions in no way grant the Board authority to override Department permitting decisions and try and shut down hatchery operations by fiat.

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Indeed, when AS 16.10.440(b) was enacted in 1979, the legislature’s reference to “the source and number of salmon eggs” referred to the collection of *wild* salmon eggs, before the hatcheries’ cost recovery operations had been fully established. Back in 1979, collection of salmon eggs from wild stocks involved the harvest of wild salmon in wild systems. In those early days, egg take from wild salmon hypothetically could have affected the Board’s allocative decisions. By contrast, hatchery egg take today is conducted from returning hatchery broodstock, captured in terminal harvest areas, not in wild systems, with little or no allocative implications.

To remove any doubt, the Department and the Attorney General’s office both opposed a similar proposal in 2023 to reduce Cook Inlet hatchery production by 75 percent because “the Board is not authorized to take action that effectively revokes or prevents the issuance of a permit,”<sup>4</sup> and because “to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions by the department for which there is specific statutory authority would upset the balance of the statutory scheme chosen by the legislature.”<sup>5</sup> Likewise, the Department has filed comments here opposing Proposals 170, 171, and 172.

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<sup>4</sup> Attorney General’s Office Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023.

<sup>5</sup> Department Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023 (quoting Department of Law Memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997)).

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### **ABOUT ASHBURN & MASON AND PWSAC**

Ashburn & Mason is submitting these comments, which focus on the relevant statutes, regulations, and established administrative practice, as a supplement to the comments submitted directly by PWSAC and other regional private nonprofit hatchery organizations, such as Valdez Fisheries Development Association (“VFDA”), Kodiak Regional Aquaculture Association (“KRAA”), and Northern Southeast Regional Aquaculture Association (“NSRAA”). Ashburn & Mason has represented PWSAC since its creation in 1974. Our firm worked closely with PWSAC’s visionary founders in the legislative process that resulted in the creation of the private nonprofit hatcheries (“PNPs”) and regional aquaculture associations, now codified at AS 16.10.375, *et seq.*

PWSAC’s founders were commercial fishers and community leaders who were responding to repeated wild salmon run failures and the resulting economic distress throughout the Prince William Sound region in the early 1970s. Working together, the fishermen, local community representatives, the Department, and key legislators developed an innovative legal framework for the creation and operation of the state’s PNPs and regional aquaculture associations.

Over the past 50+ years, the statewide hatchery system has been a resounding success and is an integral part of Alaska’s world class sustainable fisheries. Alaska’s hatcheries have generated tens of millions of dollars of economic benefit every year spread across all user groups, supplementing, but not displacing, the sustained yield of Alaska’s

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wild salmon stocks. In fact, all of PWSAC’s hatcheries were started with salmon eggs collected originally from local wild stocks. The genetics of all Prince William Sound hatchery fish are therefore traceable back to local streams.

## DISCUSSION

### **I. THE BOARD DOES NOT HAVE VETO AUTHORITY OVER HATCHERY PRODUCTION PERMITS**

#### **A. The Department Commissioner Has Primary Authority Over Hatchery Permitting and All Hatchery Operations**

##### 1. History and Purpose of the Hatchery Program

The desire of Alaskans to manage their abundant salmon fisheries was a driving force behind Alaska Statehood.<sup>6</sup> The importance of protecting and developing natural resources such as salmon is embedded in the Alaska Constitution, which directs the

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<sup>6</sup> *E.g., Pullen v. Ulmer*, 923 P.2d 54, 57 n.5 (Alaska 1996); Alaska Legislative Affairs Agency, *Alaska’s Constitution: A Citizen’s Guide* at 4 (6th ed. 2025), available at [https://akleg.gov/docs/pdf/citizens\\_guide.pdf](https://akleg.gov/docs/pdf/citizens_guide.pdf) (Many Alaskans concluded “that the federal government’s vigilance as a trustee of the public interest was really a cloak for the interests of bureaucrats and economics of nonresident corporations exploiting those resources (principally Seattle and San Francisco salmon canning companies and east coast mining conglomerates).”); HOUSE COMM. ON INTERIOR AND INSULAR AFFAIRS, *Act Providing for the Admission of the State of Alaska into the Union of 1957*, H.R. REP. No 85-624 (1958) (The Statehood Act “will enable Alaska to achieve full equality with existing States, not only in a technical juridical sense, but in practical economic terms as well. It does this by making the new State master in fact of most of the natural resources within its boundaries . . . .”); Univ. of Alaska Anchorage, Institute for Social and Economic Research, *Salmon Fish Traps in Alaska* at 14 (1999), available at [https://iseralaska.org/static/legacy\\_publication\\_links/fishrep/fishtrap.pdf](https://iseralaska.org/static/legacy_publication_links/fishrep/fishtrap.pdf) (“Alaska political entrepreneurs used the [fish] trap issue to rally the citizens of the territory around the quest for statehood.”).

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legislature to “provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters.” It also requires the legislature to make decisions that “provide for the maximum benefit of its people.”<sup>7</sup> The Alaska Constitution proclaims that “fish, wildlife, and waters are reserved to the people for common use,”<sup>8</sup> and dictates that “[f]ish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.”<sup>9</sup> Further, the Constitution expressly references the goal of “promot[ing] the efficient development of aquaculture in the State,” and protecting Alaska’s economy from outside interests:<sup>10</sup>

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood *and to promote the efficient development of aquaculture in the State.*

By the early 1970s, salmon runs were in steep decline throughout Alaska. In Prince William Sound, seining did not open at all in 1972 and 1974 due to dangerously low wild stock returns. In response, the State of Alaska resolved to restore the salmon fisheries. A

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<sup>7</sup> Alaska Const. art. VIII, § 2.

<sup>8</sup> Alaska Const. art. VIII, § 3.

<sup>9</sup> Alaska Const. art. VIII, § 4.

<sup>10</sup> Alaska Const. art. VIII, § 15. The Constitution has since been amended to provide for the limited entry permit system now in place, *see infra* note 12, but the reference to promoting the “efficient development of aquaculture” remains unchanged.

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constitutional amendment provided the basis for limited entry legislation for commercial fisheries,<sup>11</sup> and the state hatchery program was initiated through the creation of the Fisheries Rehabilitation & Enhancement Division (“FRED”).<sup>12</sup>

Under AS 16.05.020, the Commissioner must “manage, protect, maintain, *improve, and extend* the fish, game . . . of the state in the interest of the economy and general well-being of the State.” The Department is further required to: “develop and continually maintain a comprehensive, coordinated state plan for the orderly present and long-range rehabilitation, *enhancement*, and development of all aspects of the state’s fisheries for the perpetual use, benefit, and enjoyment of all citizens,” and “through rehabilitation, *enhancement*, and development programs do all things necessary to ensure perpetual *and increasing production* and use of the food resources of state waters and continental shelf

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<sup>11</sup> AS 16.43.400 *et seq.* Alaska’s limited entry fishery essentially provides that only permit holders may engage in commercial fishing. The granting of these permits, and the management of the commercial fisheries, are tightly regulated by numerous state agencies including the State Commercial Fisheries Entry Commission (“CFEC”), the Alaska Department of Fish & Game, and the Board of Fisheries. *See generally Johns v. CFEC*, 758 P.2d 1256, 1263 (Alaska 1988) (“The Limited Entry Act has two purposes: enabling fishermen to receive adequate remuneration and conserving the fishery.”).

<sup>12</sup> AS 16.05.092. As explained more fully below, FRED no longer exists as a distinct division within the Department. However, the operation (though not the ownership) of most or all of the original hatcheries owned and operated by FRED has been transferred to the regional aquaculture associations, under long-term professional services agreements. PWSAC, for example, currently operates the Cannery Creek, Main Bay, and Gulkana Hatcheries, all of which were constructed and initially operated as FRED hatcheries in the early 1970s.

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areas.”<sup>13</sup> Similarly, the Department is required generally to “manage, protect, maintain, *improve, and extend* the fish, game and aquatic plant resources of the state in the interest of the economy and the general well-being of the state.”<sup>14</sup> The Department is also generally charged to do everything possible to assist with hatchery operations.<sup>15</sup>

In addition, the legislature created the Fisheries Enhancement Revolving Loan Fund to promote the enhancement of Alaska’s fisheries by, among other things, providing long-term, low-interest loans for hatchery planning, construction, and operation.<sup>16</sup> PWSAC has received significant support from this program over the years, particularly for capital investments.

In 1974, the FRED state-owned and managed hatchery program was expanded to include private ownership of salmon hatcheries with the passage of the Private Non-Profit (PNP) Hatchery Act.<sup>17</sup> The Act stated that its purpose was to “authorize the private ownership of salmon hatcheries by qualified non-profit corporations for the purposes of contributing, by artificial means, to the rehabilitation of the State’s depleted and depressed

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<sup>13</sup> AS 16.05.092(1) and (3) (emphasis added).

<sup>14</sup> AS 16.05.020(2) (emphasis added).

<sup>15</sup> AS 16.10.443.

<sup>16</sup> AS 16.10.500–.560; *see generally* Alaska Division of Investments, “Loan Programs: Fisheries Enhancement,” available at <https://www.commerce.alaska.gov/web/inv/LoanPrograms/FisheriesEnhancement> (last visited Feb. 25, 2026).

<sup>17</sup> These provisions are now codified at AS 16.10.375 *et seq.*



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salmon fishery.” Further, as noted above, a separate fisheries enhancement loan program was created in 1976 to provide state financing for nonprofit hatcheries.<sup>18</sup>

Over time, the State has transferred operation of some of the FRED hatcheries to other entities, including the nonprofit hatcheries operated by the regional aquaculture associations, concluding that it would be more cost-effective for these hatcheries to be operated by the regional associations. The legislature specifically authorized the subcontracting of state hatcheries in 1988,<sup>19</sup> acknowledging that after 17 years of the State planning, building, and operating hatcheries, Alaska sought an even more efficient way of ensuring a healthy, robust, and sustainable salmon fishery.<sup>20</sup>

Alaska law provides that the hatcheries may only be non-profit.<sup>21</sup> By design, the hatcheries are allowed to recover operating and capital expenses, as well as costs for

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<sup>18</sup> AS 16.10.500 *et seq.*; see also *State Commercial Fisheries Entry Comm’n v. Carlson*, 65 P.3d 851, 867 (Alaska 2003) (“The state operates a revolving loan fund to support investments in developing and operating fish hatcheries and other fish enhancement projects.”).

<sup>19</sup> AS 16.10.480.

<sup>20</sup> Alaska’s partnership with the nonprofit hatcheries is unique. Almost all states operate hatcheries of some kind (salmon, trout, walleye, catfish, etc.), but no state operates a hatchery program like Alaska’s, and no state works with private nonprofit entities to assist the state government in its hatchery programs. By way of example, California has 21 state hatcheries (<https://wildlife.ca.gov/Fishing/Hatcheries>), Oregon has 33 state hatcheries (<http://www.dfw.state.or.us/fish/hatchery/>), and Washington has 76 state hatcheries (<https://wdfw.wa.gov/fishing/management/hatcheries/facilities?county=All>), and all of these hatcheries are operated by the government.

<sup>21</sup> See AS 16.10.380; AS 16.10.400(a).

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research and development and expansion of the production system, including wild stock rehabilitation work.<sup>22</sup> The system is designed to provide benefits to the common property resource users. The nonprofit regional aquaculture associations have no stockholders, owners, or members. Today, regional aquaculture associations, from Southeast Alaska to Kodiak, including PWSAC, produce hatchery salmon for common property fisheries.

Thus, the Alaska Constitution, combined with numerous statutes, including those creating the Alaska Department of Fish and Game,<sup>23</sup> the Limited Entry Act,<sup>24</sup> the Private Non-Profit Hatcheries Act,<sup>25</sup> and the Fisheries Enhancement Revolving Loan Fund,<sup>26</sup> together demonstrate a strong and long-standing state policy in Alaska of promoting hatchery development for the purpose of enhancing and ensuring the long-term vitality of Alaska's fisheries.

2. The Department Strictly Regulates All Aspects of Hatchery Creation, Operation, and Production

The Alaska Department of Fish and Game has been charged by the Alaska legislature with final authority over how many fish hatchery operations are allowed to

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<sup>22</sup> AS 16.10.455.

<sup>23</sup> AS 16.05.010 *et seq.*; *see also* 5 AAC 40.100–.990.

<sup>24</sup> *Supra* note 12.

<sup>25</sup> AS 16.10.375–480.

<sup>26</sup> AS 16.10.500–.560.

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incubate and release each year,<sup>27</sup> and to regulate all other details of hatchery operation.<sup>28</sup>

Pursuant to AS 16.10.375, the Commissioner must designate regions of the state for salmon production and develop a comprehensive salmon plan for each region through teams consisting of Department personnel and nonprofit regional associations of user groups. The Commissioner also has the task of classifying an anadromous fish stream as suitable for enhancement purposes before issuing a permit for a hatchery on that stream.<sup>29</sup>

Of particular relevance to the issues presently before the Board, AS 16.10.400(g) requires a determination by the Commissioner that a hatchery would result in substantial public benefits and would not jeopardize natural stocks. The Department is also required to conduct public hearings near the proposed hatcheries and to consider comments offered by the public at the hearings before issuance of a permit.<sup>30</sup>

All state hatcheries are operated pursuant to a permit issued by the Department.<sup>31</sup> Standard permit conditions include: (1) provisions that eggs used for broodstock come from a source approved by the Department;<sup>32</sup> (2) no placement of salmon eggs or resulting

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<sup>27</sup> AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 AAC 40.840.

<sup>28</sup> AS 16.10.375–.480; 5 AAC 40.005–.990.

<sup>29</sup> AS 16.10.400(f).

<sup>30</sup> AS 16.10.410.

<sup>31</sup> AS 16.10.400; AS 16.40.100–.199; 5 AAC 40.110–.240.

<sup>32</sup> AS 16.10.445. This requirement is related to regulations regarding fish transport permitting. *See* 5 AAC 41.001–.100. These regulations provide that no person may

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fry into waters of the state except as designated in the permit; (3) restrictions on the sale of eggs or resulting fry; (4) no release of salmon before department inspection and approval; (5) destruction of diseased salmon; (6) departmental control over where salmon are harvested by hatchery operators; and (7) hatchery location to prevent commingling with wild stocks.<sup>33</sup>

Further, there is an intricate system of basic and annual hatchery plans that are reviewed annually by the Department and provide for performance reviews, and in appropriate cases, permit alterations.<sup>34</sup> The basic management plans include a complete description of the facility, including the special harvest area, broodstock development schedules, and description of broodstock and hatchery stock management.<sup>35</sup>

Year-to-year hatchery production is regulated through the annual management plans (“AMPs”) approved and adopted by the Department. For example, each year, PWSAC and the other PNPs across the state work with the Department, which ultimately formulates

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transport, possess, export from the state, or release into the waters of the state any live fish unless that person holds a fish transport permit issued by the Commissioner.

<sup>33</sup> See generally Steven G. McGee, *Salmon Hatcheries in Alaska – Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks*, 44 American Fisheries Society Symposium 317, 327 (2004).

<sup>34</sup> 5 AAC 40.800–.990. As noted above, there is also an extensive Regional Comprehensive Planning Program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. This process creates Regional Planning Teams who are charged to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and supplement natural production . . .” 5 AAC 40.340.

<sup>35</sup> See generally McGee, at 329.

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an AMP for each hatchery. That plan, among other things, determines the number of eggs the hatchery will collect, how the eggs will be collected, the number of fish it will incubate, and how many fish will be released from the hatchery.<sup>36</sup> The AMP also addresses how PNP's will conduct their cost recovery harvest at each hatchery and other specifics of hatchery operation.<sup>37</sup>

**B. The Board Cannot Override Annual Hatchery Production Permits Issued by the Department**

1. The Board's Statutory Role Is To Allocate Harvest and Fishery Resources Between User Groups.

The Board of Fisheries is established by AS 16.05.221, “[f]or purposes of the conservation and development of the fishery resources of the state.”<sup>38</sup> In general terms, the Board's duties complement those performed by the Department. Historically, the Board's statutory authority has been understood as a mandate to allocate fisheries resources between and among the various user groups and gear types. The Board's primary function is to: (1) establish fishing seasons; (2) set quotas, bag limits, and harvest levels; (3) determine allowable fishing means and methods; and (4) generally manage the commercial, subsistence, and sport fisheries of the state.<sup>39</sup> To the best of our knowledge,

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<sup>36</sup> 5 AAC 40.840.

<sup>37</sup> McGee, at 329.

<sup>38</sup> AS 16.05.221.

<sup>39</sup> AS 16.05.251.

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the Board has always deferred to the Department's expertise and experience with respect to the detailed management of hatchery permitting and production levels.

2. The Board May Not Second Guess or Override Department Hatchery Permitting Decisions.

As set forth above, the Department oversees and permits hatcheries, and the Board allocates any resulting harvest. Any effort by the Board to override the Department's permitting decisions and hatchery oversight would be overstepping the Board's statutory bailiwick. Indeed, the legislature expressly limited the Board's authority over hatchery permitting in AS 16.05.251(f), which provides (emphasis added):

Except as expressly provided in AS 16.40.120(e) [authorizing board regulations for the conservation, maintenance and management of species for which an acquisition permit is needed] and AS 16.40.130 [authorizing regulations for the importation of aquatic plants or shellfish for stock], the *Board of Fisheries may not adopt regulations or take action regarding the issuance, denial, or conditioning of a permit under AS 16.40.100 or AS 16.40.120, the construction or operation of a farm or hatchery required to have a permit under AS 16.40.100, or a harvest with a permit issued under AS 16.40.120.*

Consistent with this provision, the legislature also provided in AS 16.10.440(b) that the Board "may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400–16.10.470."

The Proponents here will likely argue that AS 16.10.440(b) grants the Board the authority to upend the Department's carefully constructed regulatory framework governing

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hatchery production and veto Department permitting decisions.<sup>40</sup> As an initial matter, the plain text of the statute does not authorize the generalized across-the-board percentage reduction set forth in Proposal 170, the ambiguous “changes” in PWS hatchery production “sufficient to reduce straying” into Lower Cook Inlet streams set forth in Proposal 171, or the sweeping moratorium set forth in Proposal 172 that would limit the Department’s decisions on hatchery permitting. Rather, the statute’s grant of authority to the Board is very narrow and only allows the Board to, “after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs . . . .” Under this provision, any Board regulation must amend a *specific permit* and only then modify a specific “*number of salmon eggs.*” Thus, it does not allow Proposal 170’s

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<sup>40</sup> AS 16.10.440 provides in full:

(a) Fish released into the natural waters of the state by a hatchery operated under AS 16.10.400–16.10.470 are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.

(b) The Board of Fisheries may, after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest. The Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400–16.10.470.

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across-the-board percentage reduction to all hatchery permits, which is not a well-considered amendment to a specific permit that would implement a scientifically-validated-alternate-egg-take number.

Even less does the statute allow for the far more ambiguous actions recommended by Proposals 171 and 172, which essentially presume, without evidence, negative outcomes for scientific studies that have yet to be done. For example, Proposal 171 cites to a 2018 Otis study which observed hatchery salmon straying from PWS to Lower Cook Inlet streams at an alleged average of 22%.<sup>41</sup> The proposal then demands that PWS hatchery salmon straying levels be at or below the “levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan,” which recommends a straying level “below 2% of the wild-stock escapement over the long term.”<sup>42</sup> However, the very 2018 Otis study that Proponent cites to in support of Proposal 171 *explicitly states* that “it is not clear what level of straying is benign and what levels should be prevented to avoid

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<sup>41</sup> Otis, Edward O. *et al.*, *Observations of Pink Salmon Hatchery Proportions in Selected Lower Cook Inlet Escapements, 2014-2017* (Oct. 2018) (ADF&G Special Publication No. 18-11), available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/ws/SP18-11.pdf>. While Proponent alleges straying at 22%, the undersigned could not determine how Proponent got to that number based on the study.

<sup>42</sup> ADF&G, *Prince William Sound/Copper River Phase 3 Comprehensive Salmon Plan* at 25 (Oct. 1994) (ADF&G Special Publication No. 23), available at <https://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesPlanningRegional.enhance>.



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potentially negative impacts,” and that “threshold” straying levels will “likely differ by species, population, and perhaps even population segment (e.g., intertidal vs. river spawners), which further complicates the interpretation of straying results.”<sup>43</sup> Regardless of the science available, however, it is the Department’s wheelhouse, not the Board’s, to make decisions based on the available science and issue hatchery permitting and operations decisions as part of its comprehensive regulatory regime. These proposals are no more than the attempts of special interest groups to subvert the Department’s statutory permitting power through a novel application of a statute in a manner contrary to the legislature’s carefully crafted balance between the Department and the Board that has served all stakeholders well for decades.

In addition, any argument that AS 16.10.440(b) gives the Board broad powers over hatchery egg take numbers reads it out of context and is inconsistent with its historical origins. Under Alaska law, AS 16.10.440(b) must be construed in light of the overall statutory scheme governing Alaska’s salmon hatcheries,<sup>44</sup> its legislative history and

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<sup>43</sup> Otis et al., at 10.

<sup>44</sup> E.g., *Monzulla v. Voorhees Concrete Cutting*, 254 P.3d 341, 345 (Alaska 2011) (citing *In re Hutchinson’s Est.*, 577 P.2d 1074, 1075 (Alaska 1978) (discussing the doctrine of *in pari materia*: the “established principle of statutory construction that all sections of an act are to be construed together so that all have meaning and no section conflicts with another”)).

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intent,<sup>45</sup> and over 40 years of consistent administrative interpretation and practice, during which the Board (to our knowledge) has never attempted to use this statute as the basis for usurping the Department's traditional control over hatchery production.<sup>46</sup>

The current version of section 440(b) was enacted in 1979 when the hatchery system was in its infancy. Most hatchery egg take was from wild stocks, not returning hatchery fish, which is how egg take is conducted today. The thinking at the time was that salmon eggs harvested from wild stocks were still a "public resource" while the fish were swimming in wild systems, and the harvest of wild fish for egg take had allocation implications that could potentially fall within the Board's purview. In contrast, today's egg take procedures are conducted almost exclusively from returning hatchery broodstock that are captured in the special harvest areas directly in front of the hatcheries. At that point, the hatchery salmon cease to be a public resource, and their capture and the collection of their eggs have very limited allocative implications.

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<sup>45</sup> *E.g.*, *Native Vill. of Elim v. State*, 990 P.2d 1, 5 (Alaska 1999); *Kochutin v. State*, 739 P.2d 170, 171 (Alaska 1987) (citing *Hammond v. Hoffbeck*, 627 P.2d 1052, 1056 & n.7 (Alaska 1981)).

<sup>46</sup> *E.g.*, *Marathon Oil Co. v. State, Dep't of Nat. Res.*, 254 P.3d 1078, 1082 (Alaska 2011); *Premera Blue Cross v. State, Dep't of Com., Cmty. & Econ. Dev., Div. of Ins.*, 171 P.3d 1110, 1119 (Alaska 2007) (courts defer to reasonable agency determinations that implicate agency expertise); *Bullock v. State, Dep't of Cmty. & Reg'l Affairs*, 19 P.3d 1209, 1219 (Alaska 2001) (holding that agency decisions based on "long-standing, consistent, and widely known" interpretations of agency expertise should be given "great weight").

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Further, as the Department Commissioner explained to the Board addressing a 2018 emergency petition asking the Board to intervene in hatchery permitting, “the Board’s authority over the possession, transport and release of live fish had not been delegated to the department when AS 16.10.440(b) was amended.”<sup>47</sup> In 1976, AS 16.10.440 read:

- (a) Fish released into the natural waters of the state by a hatchery operator under secs. 400-470 of this chapter are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.
- (b) The board may promulgate regulations necessary to implement secs. 400-470 of this chapter.

This statutory language generated significant confusion given the overall authority vested in the Commissioner to manage the creation, operation, and permitting of nonprofit hatcheries discussed above. How were hatcheries to operate if both the Board and the Commissioner had overlapping authority? The statute was thus amended in 1979 to answer this question and make clear that all aspects of hatchery permitting and operations lay with the Commissioner, and it left the allocation of the fish in the common property water to the Board of Fisheries.

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<sup>47</sup> Memorandum from Sam Cotton, Commissioner, to John Jensen, Chair, dated January 14, 2018, Re: Emergency Petition to the Alaska Board of Fisheries requesting the Board to reverse a department decision to allow a 20 million increase in the number of pink salmon eggs to be harvested by VFDA in 2018.

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The legislative history of the 1979 amendment to section 440(b) confirms this intent and demonstrates that this statutory language was never intended to be used by the Board as a backdoor means of overriding the Department's permitting authority or limiting hatchery production. The Resources Committee's letter of intent on HB 359, which included the language in question, states as follows:

There are three other major changes made by the bill:

Section 2 of the bill amends AS 16.10.440(a)(b). The amendment clarifies the role of the Board of Fisheries. The role of the Board of Fisheries as envisioned by the original legislation was to regulate the *harvest* of salmon returning to the waters of the state. That role extends to regulating those fish which are returning as a result of releases from natural systems and also from hatchery releases. There are provisions in other specific locations for the harvest of salmon by the hatchery operator for sale, and use of the money from that sale, for the specific purposes as stated in AS 16.10.450. The added language clarifies that the Board of Fisheries may adopt regulations relating to the *harvest* of the fish by hatchery operators at the specifically designated locations. The Board of Fisheries in the past year or two has enacted regulations relating to those harvests for several of the private nonprofit hatcheries in the state.<sup>48</sup>

The exclusive reference to regulation of harvest, and the absence of any mention of production controls, corroborates the conclusion that the legislature never intended to authorize the Board to limit hatchery production, regulation of which is delegated to the Department under the statutes and regulations discussed above.

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<sup>48</sup> Alaska House Journal, March 15, 1979, pp. 601–02 (emphasis added).

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The Board's traditional function has always been to allocate harvests among competing user groups, not to regulate production of fish. This legislative history, with its emphasis on "harvest," is also consistent with PWSAC's long-held belief (apparently shared by the Department) that Section 440(b) was intended to cover egg take from wild salmon streams, not to apply to egg take from returning hatchery fish.

Further corroboration of this conclusion is found in AS 16.10.445(a), which unambiguously requires the Department, not the Board, to "approve the source and number of salmon eggs taken under AS 16.10.400–16.10.470," and in AS 16.05.251(a)(9), which grants the Board limited authority to "prohibit[] and regulat[e] the live capture, possession, transport, or release of *native or exotic fish or their eggs*" (emphasis added). Read together, these provisions demonstrate that the Department has overarching authority on the taking of all salmon eggs (wild or hatchery) while the Board's statutory authority is limited to native/exotic eggs.

Additional evidence that the Department, not the Board, is responsible for regulating hatchery egg take can be found at 5 AAC 41.001 *et seq.* For example, 5 AAC 41.005 prohibits the release of hatchery fish without a permit issued by the Commissioner. Regulation of egg take and release of the resulting salmon fry are obviously two sides of the same coin. The regulatory scheme clearly and consistently assigns exclusive

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responsibility for regulating those two closely related hatchery activities to the Commissioner.<sup>49</sup>

Given the legislative history, the 30-plus-year pattern of administrative interpretation, the anomalous language in Section 440(b) regarding regulations to “amend . . . the terms of the permit,” and the Department’s mandate vis-à-vis Section 445(b), it is quite clear that the Board has little to no role in regulating hatchery production, including, but not limited to, egg take permit restrictions.

Moreover, regulation of hatchery production by the Board would overlap and almost certainly conflict with the comprehensive and detailed hatchery regulations that are currently in place and operating effectively. As noted above, the Department has a rigorous permitting process for new hatcheries.<sup>50</sup> There is an extensive Regional Comprehensive Planning program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. By regulation, the responsibility of the Regional Planning Teams is to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and *supplement* natural production . . . .”<sup>51</sup> As mentioned earlier, there is also an intricate system of basic and annual hatchery plans that are reviewed annually by the Department,

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<sup>49</sup> E.g., 5 AAC 41.090 (granting the Commissioner authority to delegate provisions under 5 AAC 41 to persons within *the Department*).

<sup>50</sup> 5 AAC 40.110–.245.

<sup>51</sup> 5 AAC 40.340 (emphasis added).

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performance reviews, and, in appropriate cases, permit alterations.<sup>52</sup> Production levels are carefully monitored by the Department under these regulations and adjusted if necessary for economic or biological reasons.

In summary, the Department’s extensive statutory and regulatory authority for micro- and macro-hatchery regulations is legislatively defined and quite clear. There is little room for the Board to insert itself into the Department’s very public hatchery regulatory process without unintended and unpredictable collateral consequences that could, and likely would, destabilize a carefully balanced, predictable regulatory regime that has, again, served stakeholders well for decades.

**C. Both the Department and the Attorney General’s Office Concluded that a Similar Past Proposal Was Beyond the Board’s Authority**

In late 2023, the same Proponent of Proposal 170 here introduced an almost identical proposal (Proposal 43) to the Board to reduce hatchery production of pink salmon in Cook Inlet to 25% of the year 2000 production level.<sup>53</sup> The Attorney General’s office filed comments that this proposal was likely “beyond the Board’s authority, which is

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<sup>52</sup> See 5 AAC 40.185; 5 AAC 40.840; 5 AAC 40.860; 5 AAC 40.245.

<sup>53</sup> Proposal 43 for Lower Cook Inlet Finfish Board Meeting, at 41-42 (Nov. – Dec. 2023), available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI\\_all.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI_all.pdf).

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limited by AS 16.05.251(f) and AS 16.10.400 – 16.10.440.”<sup>54</sup> These comments went on to note that the Board:

[D]oes have authority to prohibit and regulate the capture, possession, transport or release of native or exotic fish or their eggs, AS 16.05.251(9), and to amend by regulation the terms of hatchery permits relating to the source and number of salmon eggs, harvest by hatchery operators, and locations for harvest, AS 16.10.440(b), *which may indirectly affect hatchery production*.<sup>55</sup>

Likewise, the Department *affirmatively opposed* Proposal 43, quoting a prior Attorney General informal opinion from 1997 that “we do not believe the Board may either (1) adopt regulations that effectively veto or override a fundamental department policy decision regarding whether to authorize the operation of a particular hatchery or (2) adopt regulations preventing the department from exercising its authority to permit a hatchery operation,” and that “to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions by the department for which there is specific statutory authority would upset the balance

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<sup>54</sup> State of Alaska Department of Law, Comments on Proposals for the November 28 – December 1, 2023 Board of Fisheries Meeting for Lower Cook Inlet Finfish, at 3 (Nov. 22, 2023) (commenting on Proposal 43), available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/dol-memo-lci.pdf>.

<sup>55</sup> *Id.* at 4 (emphasis added).



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of the statutory scheme chosen by the legislature.”<sup>56</sup> The Department also favorably quoted the informal opinion’s statement that “a Board amendment that puts a hatchery out of operation might be construed as an effective revocation or denial of a hatchery permit, an action that is expressly prohibited by AS 16.10.440(b).”<sup>57</sup> The Department concluded:

The department **OPPOSES** this proposal. Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will have a positive impact on wild salmon stocks.<sup>58</sup>

The same reasoning applies here. There is no credible, scientifically validated evidence whatsoever that such a dramatic decrease in hatchery egg take across all pink and chum hatcheries in Alaska—as proposed by Proposal 170—will have any impact, positive or negative, on wild stocks, while conversely it would have catastrophic economic effects on the hatcheries themselves and the many that depend on them for sustenance and their

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<sup>56</sup> Department Comments on Proposal 43, Lower Cook Inlet Finfish Board Meeting, at 95-98 (Nov. – Dec. 2023), available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/rc2\\_staff\\_comments\\_lci.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/rc2_staff_comments_lci.pdf) (quoting State of Alaska Department of Law, Memorandum on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production, at 12 (Nov. 6, 1997) (“1997 AG Opinion on Board Authority”), available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/hc/law.pdf>).

<sup>57</sup> *Id.* at 97-98 (quoting 1997 AG Opinion on Board Authority, at 13).

<sup>58</sup> *Id.* at 98 (emphasis in original).

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livelihoods. This is a matter of simple arithmetic and should be undisputed. Further, this draconian permit cut would have the precise impact of both overriding fundamental Department policy decisions on hatchery production and could potentially put one or more hatcheries out of operation entirely, thus effectively revoking their permits.

**D. The Department Has Historically Opposed Proposals Similar to the Current Proposals as Misguided and Beyond the Board’s Authority**

After opposing Proposal 43, discussed in the previous section, the Department continued to maintain the same position on other proposals similar to the current hatchery-related proposals, especially Proposal 170, concluding that they are beyond the Board’s authority.<sup>59</sup> It has also repeatedly referenced the prior 1997 Attorney General opinion, which states that “Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized.”<sup>60</sup>

For example, in response to another proposal (Proposal 78) in late 2024, which proposed reducing PWS and VFDA hatchery pink and chum permitted egg take by 25%, the Department again concluded:

The department **OPPOSES** this proposal. Hatchery egg-take levels are established through an iterative process involving department staff and

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<sup>59</sup> Department Comments on Proposal 78, Prince William Sound and Upper Copper/Upper Susitna Rivers and Shellfish (Except Shrimp) Board Meeting, at 197-200 (Dec. 2024), available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/pws/rc2\\_staff-comments\\_12-3-24.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/pws/rc2_staff-comments_12-3-24.pdf).

<sup>60</sup> *Id.* at 199 (quoting 1997 AG Opinion on Board Authority, at 2).

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stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks. The commissioner can amend a permit if the hatchery is not in the public's best interest or to mitigate the adverse effects of the hatchery operation. If there is a compelling reason to amend the terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will reduce adverse effects on wild stocks. This proposal did not provide evidence to support that current permitted pink and chum salmon egg-take levels adversely affect wild stocks, in or outside the Prince William Sound enhancement area.

If the board were to adopt this proposal, there would need to be a discussion of how to apportion the egg-take cap because egg-take capacity is set on each hatchery permit. A straight 25% cut to each species at each hatchery may have unintended effects on the production of other species of salmon and may affect harvest allocation, which are a primary concern of the boards of the PNP corporations.<sup>61</sup>

Likewise, and most recently, the Department opposed Proposal 156 in early 2025 that again sought to “[r]educe the permitted egg intake of pink and chum salmon of each applicable Southeast hatchery for pink and chum salmon by 25%.”<sup>62</sup> The Department again stated:

The department **OPPOSES** this proposal because the changes to Alaska hatchery salmon production envisioned by this proposal are likely to have little effect on marine competition among salmon species. The department recognizes that straying of hatchery-produced chum salmon in Southeast Alaska has impacted the ability to assess status of wild chum salmon returns in some areas and is analyzing this problem to determine whether changes to

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<sup>61</sup> *Id.* at 200 (emphasis in original).

<sup>62</sup> Department Comments on Proposal 156, Southeast Alaska King Salmon, Groundfish, and Shellfish Board Meeting, at 215-19 (Jan. – Feb. 2025), available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2\\_staff-comments\\_12-30-24.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/se/rc2_staff-comments_12-30-24.pdf).

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hatchery release practices could reduce straying of hatchery produced chum salmon. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks and the commissioner can amend a permit if the hatchery is not in the best interest of the public or to mitigate the adverse effects of the hatchery operation. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will reduce adverse effects on wild salmon stocks. No evidence was provided in this proposal to support that current permitted pink and chum salmon egg-take levels adversely affect wild stocks, in or outside the southeast enhancement area.

If the board were to adopt this proposal, there would need to be a discussion of how to apportion the egg-take cap because egg-take capacity is set on each hatchery permit. A straight 25% cut to each species at each hatchery may have unintended effects on production of other species of salmon and may have harvest allocation affects, which are a primary concern of the boards of the PNP corporations.<sup>63</sup>

In short, the Department has been consistent in its position on proposals seeking to disrupt the regulatory balance between the Department and the Board mandated by the legislature.

#### **E. The Department Submitted Comments Opposing All Three Proposals Here**

Consistent with past practice above, the Department has again submitted comments opposing Proposals 170, 171, and 172 here.<sup>64</sup>

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<sup>63</sup> *Id.* at 218-19.

<sup>64</sup> Department Comments on Proposals 170, 171, and 172, Statewide Finfish and Supplemental Issues Board Meeting, at 85-99 (Mar. 2026), available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/state/adfg-staff-comments\\_2-27-26.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/state/adfg-staff-comments_2-27-26.pdf).

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Regarding Proposal 170, the Department states:

The department **OPPOSES** this proposal as written. Although there are a significant number of publications on interactions between hatchery production and wild stocks of salmon, very few are directly applicable to Alaska's salmon populations. Salmon hatcheries outside of Alaska are used to mitigate lost production (e.g., reduced spawning habitat and dams), have different harvest management plans for adult returns, and are not subject to the same precautionary statutes, regulations, and policies as Alaska hatcheries. Alaska policies were designed to avoid past mistakes of hatchery programs operating in the contiguous United States. The publications that do focus on Alaska hatchery/wild interactions have primarily been correlative studies that infer negative interactions at sea, despite multiple other potential causes that may lead to the same result. Over the past 50 years of Alaska hatchery production, the department has strived to meet the legislature's directive to enhance Alaska's salmon fisheries, while at the same time protecting wild stocks. The department will continue to closely monitor the hatchery program and take steps to address concerns if there is a compelling reason to amend the terms of a hatchery permit based on data that provide clear evidence the amendment will have a reasonable probability of measurably reducing identified adverse effects on wild salmon stocks. The permitted capacity of pink and chum salmon has remained the same since 2019. When the department has detected impacts of hatchery fish on wild stocks, such as in the case of Crawfish Inlet, where straying hatchery chum salmon impeded the department's ability to estimate area wild stock escapement, the department took action to reduce hatchery releases in the area. Effectiveness of this hatchery release reduction will be evaluated in coming years.<sup>65</sup>

Regarding Proposal 171, the Department states:

The department **OPPOSES** this proposal because there is not a mechanism relating Prince William Sound (PWS) hatchery pink salmon egg-take levels to the amount of PWS hatchery pink salmon present in Lower Cook Inlet streams. It is likely that factors other than egg-take level exert influence on the rate of straying. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery

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<sup>65</sup> *Id.* at 88.

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operations are permitted with consideration of minimizing impact on wild salmon stocks, and the commissioner can amend a permit if the hatchery is not in the best interest of the public. The commissioner may alter the permit to mitigate the adverse effects of the hatchery operation. The department will continue to closely monitor the hatchery program and take steps to address concerns if there is a compelling reason to amend the terms of a hatchery permit that is based on analysis of data and provides clear evidence the amendment will have a reasonable probability of measurably reducing identified adverse effects on wild salmon stocks. The department's current hatchery/wild interaction study is working to establish baseline genetic data, which, when applied to the overall conclusions of the study, will guide the department in production decisions. The permitted capacity of pink salmon in Prince William Sound has remained the same since 2019.

When the department has detected impacts of hatchery fish on wild stocks, such as in the case of Crawfish Inlet, where straying hatchery chum salmon impeded the department's ability to estimate area wild stock escapement, the department took action to reduce hatchery releases in the area. Effectiveness of this hatchery release reduction will be evaluated in coming years.

If the board were to generate a regulation to reduce pink salmon egg-take numbers, it should also consider the effect that changes to permitted egg capacity will have on the hatchery association's financial stability, its ability to produce other species of salmon, and the resulting changes to allocation of harvest among gear groups. Each hatchery association takes these things into account when annually reviewing hatchery production.<sup>66</sup>

Regarding Proposal 172, the Department's opposition is almost identical to its opposition to Proposal 171:

The department **OPPOSES** this proposal. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks and the commissioner can amend a permit if the hatchery is not in the best interest of the public or to mitigate the adverse effects of the hatchery operation. The department will continue

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<sup>66</sup> *Id.* at 95.

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to closely monitor the hatchery program and take steps to address concerns if there is a compelling reason to amend the terms of a hatchery permit that is based on analysis of data, and provides clear evidence the amendment will have a reasonable probability of measurably reducing identified adverse effects on wild salmon stocks. The permitted capacity of pink and chum salmon has remained the same since 2019.

When the department has detected impacts of hatchery fish on wild stocks, such as in the case of Crawfish Inlet, where straying hatchery chum salmon impeded the department's ability to estimate area wild stock escapement, the department took action to reduce hatchery releases in the area. Effectiveness of this hatchery release reduction will be evaluated in coming years.<sup>67</sup>

In summary, the Department's opposition to these Proposals mirrors the comments here regarding the Board's statutory authority and the lack of evidence that any of these Proposals will have a positive impact on the problems they are meant to address.

## **II. THE BOARD DOES NOT HAVE AUTHORITY TO PROMULGATE NEW HATCHERY PERMITTING REGULATIONS AS PROPOSED BY PROPOSALS 170, 171, AND 172**

Proposals 170, 171, and 172 seek to have the Board promulgate new regulations regarding hatchery permitting. All three proposals ask either for statewide reductions in hatchery permit egg take or for a reduction in PWS hatchery permit egg take. However, in neither circumstance can the Board issue regulations to do so. Rather, as explained in detail above, any such authority lies with the Department. Furthermore, past proponents of similar proposals have sought to have the Board *amend* existing regulations to allow for a

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<sup>67</sup> *Id.* at 98-99.

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reduction in egg take, but as explained below, the Board can neither amend nor create such regulations.

Previously, the proponent of Proposal 78 in late 2024 proposed similar reductions in hatchery production in both Cook Inlet and Kodiak,<sup>68</sup> both times seeking to amend 5 AAC 40.820, which addressed the creation of hatchery basic management plans *statewide*.<sup>69</sup> In likely recognition that the Board may not amend a statewide regulation to

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<sup>68</sup> Proposal 59 for 2024 Kodiak Meeting to amend 5 AAC 40.820 to “[r]educe hatchery production to 25% of the year 2000 production as promised in 2000,” available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/kodiak\\_all.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/kodiak_all.pdf); Proposal 43 for 2023 Lower Cook Inlet Finfish Board Meeting to amend 5 AAC 40.820 to “[a]mend the Cook Inlet Salmon Enhancement Allocation Plan to specify pink salmon production, as follows: Reduce hatchery production to 25% of the year 2000 production as promised in 2000,” available at [https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI\\_all.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI_all.pdf).

<sup>69</sup> 5 AAC 40.820 provides:

(a) A hatchery operator shall manage the hatchery and its salmon returns in accordance with a basic management plan approved by the commissioner. Before the public hearing held under 5 AAC 40.210 on the proposed hatchery, department staff, in conjunction with the applicant, shall develop a draft basic management plan that includes a facility development schedule of no more than five years. Department staff and the applicant shall present the draft basic management plan and facility development schedule at the public hearing and shall make copies available for public review and comment at the hearing.

(b) If, following the public hearing, the commissioner decides to issue a permit for the proposed hatchery, department staff shall finalize the basic management plan and facility development schedule after all comments have been considered. The final basic management plan, which includes a facility development schedule, describes the conditions under which the permit will be implemented, and is an addendum to the permit.



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address hatchery permitting in specific regions, that proponent changed tactics and sought to amend a Prince William Sound-specific regulation addressing hatchery fish. But the fundamental problem remained that there was no place in the Board regulations addressing amendment of hatchery permits. That proponent sought to shoehorn the permit amendment into an unrelated regulation, but it simply could not do so. As discussed above, the Board lacks statutory authority to set egg take policy for returning hatchery fish, full stop. Here, none of the three Proposals pertain to the Board's harvest allocation authority, and thus the Board has no authority to promulgate the types of regulations the Proponents seek.

Moreover, the Board *cannot* have such authority, because it would be completely untenable for two agencies—the Board and the Department—to each have authority to set egg take policy for returning hatchery salmon. Stakeholders must be able to rely on the policy set by the agency with statutory decision-making authority for short-, medium-, and long-term planning purposes. Here, that agency has always been the Department. The stakes are too high to change the status quo for the sake of implementing experimental policies advocated for by special interest groups through statutes that the legislature had always intended to govern the Board's authority to regulate harvest allocation, not egg take from returning hatchery salmon.

### **CONCLUSION**

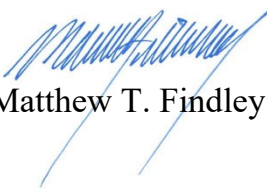
Back in the early 1970s, Prince William Sound experienced recurring wild salmon run failures, which caused serious financial distress throughout the region. In response,

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the framers of the Constitution and the Alaska Legislature took active and far-sighted steps to first establish a state-run hatchery system and, shortly thereafter, the private non-profit and regional hatchery regime that has consistently stabilized the runs and enhanced salmon harvests throughout the state since 1974. Overall, Alaska's hatcheries have been a remarkable success and have helped the state's salmon resources to thrive and expand over the past 50 years, creating millions of dollars of positive economic impact, without any demonstrable harm to wild salmon stocks. From the very beginning, every aspect of Alaska's hatcheries' creation, operation, and production have been closely supervised and regulated by the Department, with harvest area and allocation decisions made by the Board. This division of responsibility has served Alaska well for many years, and there is no good reason to abandon it now.

For these reasons, and consistent with the comments of the Department, the Board should reject Proposals 170, 171, and 172.

ASHBURN & MASON, P.C.



Matthew T. Findley



Stephanie X. Huang

**Submitted by:** Avery Ault

**Community of Residence:** Homer

I am in full support of prop 177 for the conservation of or local fish species. It will limit the amount of damage to fish that's get released, those fish can be kept. And it will ensure a fair fishing practice for disabled of injured clients on guided angler boats.

**Submitted by:** Erik Bakke

**Community of Residence:** Homer

I want no trawling in state waters. Trawling is too destructive, our fisheries are too valuable, and so many are already struggling. It's mind boggling that you allowed trawling in PWS this year.

If you're going to allow pelagic trawling, it should be severely constrained. To that end:

Proposal 11 - Support

Proposal 163 - Support

Proposal 164 - Support

Proposal 165 - Support

Proposal 166 - Support

Proposal 167 - Support

Proposal 168 - Support

Proposal 169 - Support

Other proposals:

Proposal 173 - Support

Proposal 174 - Support

**Submitted by:** Kent Barkhau

Woodstock Fisheries LLC

**Community of Residence:** Sitka

Thank you for the opportunity to submit comments prior to board deliberation. My name is Kent Barkhau. I have lived in Alaska for 46 years. Our family has depended on the health, diversity and abundance of our marine waters to provide a living that has allowed my wife and I to raise our family here. Our commercial fishing has been with hook and line for Sablefish, Halibut, and Salmon. In addition to the economic livelihood, our family greatly benefits and relies on subsistence harvest to sustain us.

I stand in support for proposals 163, 164, and 165.

Alaska State regulations currently prohibit seafloor contact by pelagic trawls. However, analysis and statements made to the North Pacific Fishery Management Council establish that there is substantial contact by "pelagic" trawls with the seafloor. Without corrective action this substantial bottom contact by "pelagic" trawls will

continue and seafloor ecosystems will continue to be degraded or destroyed in areas that have been identified for needed protection. These protected habitats contribute to ecosystem health and productivity in adjacent areas and indeed to a degree throughout the entire North Pacific.

We need enforceable and verifiable rules for keeping these nets off the sea floor. Industry will have to adapt to be able to do so or they should no longer be able to fish in these areas. Proposals 163 and 164 will provide this result.

I support proposal 165 as a "no-brainer" provided that the required salmon excluders result in a reduction in bycatch mortality of non target species of concern.

Thank you.

Kent Barkhau

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PC33

**Submitted by:** Filimon Basargin

**Community of Residence:** Homee

I support proposal sb 161 I have alongside trawlers most of my fishing career since 1989 I've seen the damage done by trawlers first hand I longlined alongside trawlers in 1993 and those areas are still dead due to the destruction of the ocean bed till this day there's no fish on Gore pt. I also fished alongside trawlers in Shelikoff straight the halibut highway of The Alaskan Gulf I seen first hand how much dead halibut gets dumped overboard and till this day Shelikoff strait is a dead zone as well no fish of any kind. I also fish Tanner crab on east side of Kodiak Ugak bay and Sitkalidak strait and trawlers didn't trawl between dangerous cape and Barnabas cape a little over two years the crab came back in massive numbers from being closed to a 6 million lb quota in 2 short years and when trawlers opened in that area went back to being closed in 2 short years. They admitted to dumping 15,000 crab per trawl set until it was diminished. It was like they planned to destroy our only fishery that we have in the winter. Thank you for the opportunity to submit my experience with trawlers and hopefully you will consider saving the last of Alaska's fisheries, coastline and the ocean floor before it's too late. Thank you!

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My name is Patrick Baum, and I am representing myself as an Alaskan resident. I am a lifelong Alaskan living in Juneau with my wife and two kids. I'm a recreational fishing and hunting license holder, a harvester of the land and sea, and I also fish commercially as a salmon troller. I care about maintaining opportunity and abundance for Alaskans while keeping management enforceable, fair, and grounded in conservation.

### **1) Trawling / Groundfish trawl proposals — SUPPORT (Proposals 11, 163–165)**

I support proposals that strengthen conservation safeguards and accountability for trawl operations in state waters. Where regulations prohibit seafloor contact, there must be monitoring and verification systems that can reliably demonstrate compliance. Measures that presume trawl gear in state waters is bottom-contact unless proven otherwise, or that require seafloor contact monitoring, directly address enforceability and protect benthic habitat and sensitive fisheries resources.

I also support practical bycatch-reduction tools such as requiring approved salmon excluders for pelagic trawl gear operated in state waters. This is a reasonable, performance-based approach that allows fishing to continue while reducing salmon interactions and improving public trust in management.

I further support protecting high-value habitat by limiting trawl effort where it threatens key stocks, including crab habitat concerns raised in Proposal 11.

### **2) Hatchery proposals — OPPOSE (Proposals 170–172)**

I oppose the hatchery proposals (statewide egg-take reduction and moratorium concepts). Proposals reducing permitted egg take for pink and chum by 25% statewide are overly broad and risk unintended consequences for Alaska communities and fisheries that depend on hatchery returns for economic stability and support services.

If changes are needed, they should be targeted, region-specific, and phased, with realistic timelines, and a focus on minimizing harm to working waterfront communities while addressing any demonstrated biological risk.

### **3) Sport bag/possession & annual-limit proposals - OPPOSE (Proposals 176–180)**

I oppose proposals that allow anglers on the same vessel to pool bag and possession limits. Pooling shifts regulations away from individual accountability, creates practical enforcement confusion (who "owns" fish onboard, and when seasonal limits are reached), and risks increasing total retention behavior in ways that are hard to track.

I also oppose a statewide annual Chinook limit approach as proposed. Chinook management is already highly complex across Alaska, and the proposal materials themselves acknowledge concerns about how statewide limits could affect allocations in regions tied to the Pacific Salmon Treaty framework.

A statewide annual cap may sound simple, and it could create inequities and unintended outcomes across the different regions and fisheries.

**Submitted by:** Aaron Bean

**Community of Residence:** Craig

Re: Proposals 163–165 – Types of Legal Gear (Bottom Trawling Restrictions in State Waters), Statewide Finfish and Supplemental Issues Meeting

Dear Board Members,

I strongly support a complete shutdown of bottom trawling within Alaska state waters, as proposed. No one is denying the destructive nature of bottom trawling in many parts of the world, nor claiming it is the sole cause of any fishery decline. In fact, numerous trawl fisheries have been shut down or severely restricted precisely because of their documented damage to seafloor habitats, biodiversity, and unsustainable bycatch. Prominent examples include:

- The U.S. West Coast, where more than 140,000 square miles of seafloor habitat are now closed to bottom trawling to protect essential fish habitat, corals, and sponges.
- The European Union’s 2023 action plan to end bottom trawling in all Marine Protected Areas by 2030, with leading nations like Greece (full ban by 2030, starting in national parks by 2026) and Sweden (ban adopted 2025) already acting.
- International high-seas efforts, including the 2025 IUCN resolution calling for a phase-out of bottom trawling on seamounts (now headed to the UN General Assembly).
- Ghana’s 2025 commitment at the UN Ocean Conference and new fisheries law banning bottom trawling and industrial fishing practices in expanded inshore exclusion zones.

Many other nations have taken similar steps for the same reasons. These actions show that where the science and impacts warranted it, closures happened—and one would think Alaska state waters deserve the same basic protection.

The push for blanket closures doesn’t fall short. It’s the solution.

The crashing Yukon and Kuskokwim salmon runs have zero trawling inside the rivers themselves. Yet those fish must migrate straight through the Bering Sea pollock grounds where the fleet operates. Genetic testing and observer data confirm that Western Alaska Chinook and chum salmon are taken as bycatch—thousands of fish in some years—even if that represents only about 1-2% of total mortality on average. When runs are already at historic lows (with Yukon chum subsistence fisheries closed for years), even that small, human-controlled fraction removes fish that rural communities desperately need for food security. It is not the main driver—climate is far bigger—but it is one we can actually manage and tighten.

Yet the North Pacific Fishery Management Council recognized this reality just last month (February 2026) when it voted to establish new Western Alaska chum salmon bycatch limits and partial corridor closures in the Bering Sea pollock fishery specifically to protect subsistence users. (I personally believe the measures as adopted will not meaningfully change outcomes, but the Council’s action itself proves the data justified addressing it.) Past effort reductions have not rebuilt stocks because climate change is the dominant factor—that is correct.

And we’re presupposing that climate factor. Presuming it is; which there’s much evidence to show that the government has failed to acknowledge natural cycles in the climate over millennia, as documented in traditional ecological knowledge that is ignored by the state of Alaska and the federal government.

We have no control over the climate; but we do have control over our behavior, and fisheries management is charged with preserving the resource for all Alaskans—not just commercial trawlers. The trawlers need to bear the burden of conservation along with the rest of the user groups. If subsistence is zero, bycatch should be zero. Hard stop.

No one is “picking a political villain.” (Though it is curious how quickly that label gets applied whenever anyone suggests the fleet should share the pain.) Alaskans are simply asking for the same consistent, science-based approach we already apply across every other stressor: climate, hatcheries, international interception, predation, freshwater habitat loss, and the bycatch/habitat effects of trawling.

Yes, the issue feels emotional when entire villages cannot put salmon on the table while the fleet continues to haul pollock. But the science is clear: we must manage all stressors, not just the ones that do not affect one particular fleet.

Supporting a full shutdown in state waters is the right first step. Let’s not pretend otherwise.

Thank you for considering this comment and for your service on the Board.

Sincerely,

/s/ Aaron D. Bean

Craig, Alaska

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PC36

**Submitted by:** Matthew Beck

**Community of Residence:** Palmer

I am a longtime valley resident and have watched our Coho stocks dwindle. Coho season used to be great and the previous safety corridor in Cook Inlet made a huge difference in the size of the returns. We would fish through August and September and our freezer was filled with local-caught cohos. Our friends from out of state would come visit and return home with full fish boxes. About 10 years ago, all that changed when the fish numbers dwindled. There are very few fish to be caught. Fishing guides and visitors have moved elsewhere. Our friends fish in Kodiak instead of the Mat-Su because the fish numbers aren’t that good. It’s hurting Alaska and the Mat-Su. I am in support of Proposal 186.

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PC37

**Submitted by:** Ben Behan

**Community of Residence:** Trempealeau, Wisconsin

Members of the Board,

My name is Ben Behan and I currently reside in Trempealeau, Wisconsin. This upcoming summer will mark my seventh season being a part of the commercial set gillnet fishery located in the Eshamy District of Prince William Sound. Additionally, I have participated in the commercial shrimp and drift gillnet fisheries in the sound as well as the various sport fisheries that the sound has to offer. I currently sit as the setnet seat on the PWSAC board of directors and am a member of both CDFU and the Prince William Sound Setnetters’ Association.

Proposal 164: SUPPORT

Proposal 165: SUPPORT

Proposals 170, 171 & 172: OPPOSE

I strongly oppose proposals 170-172 that seek to make overly aggressive cuts towards common property hatchery fish. Chum and Pink salmon are much more than just commercially harvested fish. While these species are part of the commercial fishery, they are also integral to sport and subsistence users, research, and monitoring.

Hatcheries play a vital role in coastal communities statewide for sport, subsistence and personal use harvesters alike. Proposals 170-172 would hinder all user groups by destabilizing the current infrastructure that hatcheries offer throughout many parts of rural Alaska.

Proposals 170-172 are impactful when taken away from fishing as a whole. These proposals attack the world class systems that the Alaska Department and Fish and Game has built and honored for decades. Consequently, these proposals inflict not regional but statewide restrictions that exclude the science based model that for years Alaska has relied on to manage its pristine fisheries that we all know and love.

It is without question that we as harvesters are always concerned about the abundance of salmon and our ability to participate in whichever user group we fall into. I believe that it is equally important to be concerned about, and adhere to, the public process that the state of Alaska's fisheries rely on to function, so that we as harvesters get the opportunity to participate in a fishery we love and care so much about.

Proposal 175: SUPPORT

Proposal 180: SUPPORT

Proposal 187: OPPOSE

Proposal 187 aims to close traditional fishing grounds for the sole benefit of one user group. There is neither a conservation nor an accessibility concern at play with this proposal. Commercial and sport users are able to harvest salmon at a rate that does not warrant a complete discontinuation of a historical fishing area for one user group.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Clay Bezenek, and I am a commercial fisherman, conservationist, and concerned citizen in Ketchikan, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals were implemented, they would directly harm the whole town, as every business would feel the economic impact, from the hatcheries to the fuel docks. All facets of our economic ladder would be negatively impacted.

As a harvester who cares greatly about our environment, I would support these proposals if someone could show me good scientific evidence that hatcheries are harming our salmon or ocean system. All I have seen so far are some potential causations that are unproven, while the hatcheries have made great efforts toward understanding issues associated with enhanced fish. I grew up in the Midwest where walleye enhancement was the norm. I am definitely on the side of solid science when making decisions concerning programs such as these.

Enhancement facilities are held to strict rules concerning releases, and if science proves them unworthy, then let us do something about it. But complaints about fish in people's backyards are not scientific grounds for these proposals — you would have to ask the eagles and bears if they want the hatcheries gone as well. I am also concerned about PNP hatcheries losing staff and historical knowledge if production is reduced.

This issue was brought up more in Southeast when king salmon numbers started falling in the 2010s. The king salmon numbers in our two biggest Southeast rivers have since increased to normal levels. I believe our general ocean conditions were the cause. The earth is always changing, and ebbs and flows are a normal result.

The best example of hatchery value is how wild fish are no longer pressured nearly as much as in the pre-hatchery days when that was all there was to catch. Our southern Southeast fisheries used to hit the local and northern British Columbia fish hard. Now people target enhanced fish primarily and leave the wild fish pretty much alone. The wild fish down here are doing really well.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed

continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Clay Bezenek  
Ketchikan, Alaska



**Submitted by:** Keith Billi

**Community of Residence:** Petersburg

I am opposed to 170, 171, and 172.

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**Submitted by:** David Blake

**Community of Residence:** St. Maries, ID and Cordova AK

My name is David Blake. I have been an Area E drift gillnet permit holder and have fished Area E for the past 42 years. I have been in Cordova AK usually from early May to Mid September for most of the 42 years while participating in this fishery. During that time I also owned and ran a Tax Preparation practice in WA State for 26 of those 42 years in the fishery. I worked in a boat shop building Bristol Bay commercial fishing vessels for 10 years prior to the change to tax preparation. I have participated in person at multiple Board of Fish and via written comment in most Board of Fish for PWS. I have been on the board of Prince William Sound Aquaculture for multiple terms and have participated in the Prince William Marketing Association.

Proposal 170: Oppose this proposal

If this proposal is passed it will affect not only Commercial fishers but also Sport, Personal Users, as well as all other resource users in the State of Alaska. It also affects processors and communities, flowing down to all Alaska Residents that work in the Seafood, Tourist and Hospitality industries in all of AK.

Proposal 171: Oppose this proposal

Without using Science this would affect my ability to make a living and also all those AK residents (Fishermen of all types Sport, Personal Use, Subsistence, Commercial) that depend upon the resource in many ways including employment by processors, and communities. It would also affect all those far reaching families that are connected in any way not just directly connected to employment by the Seafood industry but those that rely on that industry to purchase supplies and services. Very far reaching into the economy of AK in many ways.

Proposal 172: Oppose this proposal

This would close the door to future innovation that could and most likely will benefit many Alaska residents whether directly connected or not, as it will affect State and Community income and viability.

Proposal 187: Oppose this proposal

This is a reallocation of a resource without having a science based reason, only a shift of resource to another user group driven by want not science.

Thank you for your time,

David Blake

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ronald Blake, and I am a commercial fisherman based in Cordova, Alaska. I operate the F/V Ace.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would be extremely harmful to my fishing business, possibly making it no longer viable.

Just the lost fish tax revenue for our town would have a huge effect on local services, and of course there would be a loss of jobs. This approach seems far too drastic when it would have such a devastating effect on rural Alaska communities.

Hatchery production in Alaska is a small portion of the total fry that go into the ocean each year, yet it is such a tremendous benefit to so many people and communities. It makes no sense to take drastic measures without being absolutely certain of the benefits.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ronald Blake  
Cordova, Alaska



**Submitted by:** Nick Blanco

**Community of Residence:** Kodiak Larsen Bay

I am here to support proposal 11 banning bottom trawl in the waters specified. Bottom trawling is a shameful way to fish, leaving permanent and irreparable damage to countless species of fish habitat, not to mention the significant halibut bycatch. The resulting massive silt clouds from running such gear are also very worrisome, blocking out sunlight, stifling plant/habitat growth and earths natural ability to sequester carbon. Is bottom trawling efficient? Yes. Does it cause damage to entire ecosystems and the population inhabiting them? Yes. Do us all a favor and ban it.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Blount. I am a commercial fisherman from Cordova and fish aboard the F/V Salmon Shark.

These proposals would create additional economic hardship for my fishing business and negatively affect the economic well-being of Alaskans—especially communities like Cordova, Whittier, Valdez, and the Mat-Su Valley. The hatchery system also supports sport fishing opportunities in Prince William Sound.

A reduction in production would reduce returns for user groups and place additional strain on hatchery operations. My major concern is the lack of scientific basis for these reductions. I do not believe these broad actions will strengthen wild runs; instead, they will create hardship across user groups.

As a former Fish and Game technician, I recognize how limited our understanding is of what happens in the salmon life cycle offshore. There is no evidence of direct conflict between hatchery and wild fish sufficient to justify blanket reductions. The hatchery system has stabilized economic conditions in commercial fishing and benefits multiple user groups. Those benefits support management and research through landing taxes and related revenue that fund fisheries work.

Approved testimonial:

“In my 35 years of direct experience with fisheries research management and commercial fisheries I have found the hatchery system to be a stabilizing force for the state of Alaska. Hatchery production benefits all user groups. Lack of science and uneducated perspectives are no reason to dismantle a proven system that is beneficial to so many different user groups. Please don't allow a sunset on one of the most viable components of Alaska fisheries.”

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
David Blount  
Cordova, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Curtis Bollinger, and I am a commercial salmon fisherman based in Kodiak. I fish aboard the F/V SEA WALKER. These proposals would have significant negative impacts on Kodiak's salmon fishery. They would take away enough opportunity in areas near the hatchery that it would condense the fleet, adding more pressure to the west side of the island. Especially in our lean years, it would drastically reduce access to fish and overall income to the fleet.

On average, about half of my catch comes from hatchery fish. A 25% reduction could mean that some years we may not even get access to the hatchery at all, which would be devastating to my family's livelihood and could possibly make salmon fishing a nonviable source of income for many.

These proposals would affect the community as well through reduced fish tax for a city whose budget deficit has already forced school closures. They would also reduce work in the processing sector and decrease money circulation throughout Kodiak small businesses.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Curtis Bollinger

Kodiak, Alaska



**Submitted by:** Robin Bond

**Community of Residence:** Talkeetna

Please stop trawling. Trawling within a minimum of 200miles from the shoreline should be the minimum if it must stay. Our fish and other sealife are almost gone. Please stop the trawling now. Also how are we suppose to keep up with all the proposals. I think there is so many so we can not. You all know how 74 % of alaska feels. Btw more don't like what trawling has done to alaska and the people who live here however , they don't weight in ....And the 74% who do you all are not acting like you hear them. Also please stop making it so hard to understand things. Alaska is tired and it it your job to do what is right and follow the Alaska constitution also. Also it is super hard to get reference to what these proposals 11 & proposals 162 thru 187.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Dylan Borden-Deal, and I am a commercial salmon seine fisherman in Prince William Sound, Alaska. I operate the F/V Defiance under Deal Fisheries LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. A reduction of salmon hatchery production would negatively impact my fishing business by reducing the time and area allowed for common property fishing opportunity throughout the pink salmon season. Hatcheries already take a large percentage of the salmon run through their cost recovery program. A reduction in hatchery production would result in cost recovery taking a much greater percentage of the overall run, leaving practically nothing left for the commercial fishing fleet.

Reduced hatchery production would be devastating to the economy of Cordova. Cordova does not enjoy the luxury of a large-scale tourism economy. This leaves Cordova's economy solely reliant on the fishing industry, to which hatchery production plays a vital and irreplaceable role.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Dylan Borden-Deal  
Alaska



**Submitted by:** Rowan Borden-Deal

**Community of Residence:** Cordova

170, 171 and 172.

I don't support these proposals

I am a life long pws fisherman I have been a stake holder since before I can remember. These proposals are based on bogus science and I am strongly opposed to any changes they may affect. To be more clear this is a high jacking of this platform to serve special interest. The KRSA ..KENAI RIVER SPORTFISHING ASSOCIATION takes money from the big oil and the industrial mine lobby! The fisherman are the people that have spent their lives fishing these waters and are committed to sustainability like they are committed to breathing. The hatcheries allow all of the coastal communities to thrive and remain viable providing salmon to America. Please do not allow KRSA to dismember another thriving Alaska salmon fishery

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March 2, 2026

Dear Members of the Board of Fisheries:

My name is Tim Botz. I am a commercial salmon fisherman in Kodiak and owner of the F/V Janie Lou.

Salmon fishing income naturally varies year to year. Reduced hatchery production would significantly reduce my crew's and my income even further. During low wild run years, hatchery fishing allows the fleet to remain financially viable while wild stocks recover and escapement goals are met.

If adopted, these proposals would result in job loss and decreased income across Kodiak, affecting local businesses, schools, and tax revenue for local government.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Tim Botz  
Kodiak, Alaska



**Submitted by:** Chris Bourgeois

**Community of Residence:** Cordova

I am adamantly opposed to Proposals 170, 171 and 172 because they lack any scientific evidence to support their claims. I am opposed to Proposal 187 because of it's re-allocative nature.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Blake Bousley, and I am a commercial salmon fisherman, tribal member, subsistence user, and community member in Ketchikan, Alaska. I operate the fishing vessel Prime-Time and am a member of the Metlakatla Indian Community.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The adoption of these proposals would greatly reduce my income stability and business viability because I depend on hatchery production for success. I take pride in not putting fishing pressure on wild salmon runs by focusing on hatchery fish in specific isolated areas. Reducing hatchery production would create serious problems in operational planning because 80 percent of my fishing efforts are focused on hatchery fish.

These proposals would have huge adverse effects on our community because the revenue generated from chum salmon production helps pay for the production of king salmon and coho salmon that many of our sport, charter, and subsistence users focus on. People can catch salmon right close to town, and without these options, they would not be able to fish from shore or small boats. Without these salmon, all of these gear groups would then put pressure on wild salmon runs that have had trouble meeting escapement in recent years.

The risk of revenue loss for commercial fishermen threatens the economic viability of our businesses. In turn, that loss of revenue would create large deficits for the hatcheries, which would no longer be able to operate because they depend on the ex-vessel tax generated from commercial fishing boats.

The implementation of a reduction in hatchery production without the science or evidence to back up the reasoning is concerning because it puts so much at stake and so many people in a difficult position without the guarantee of a fix to any problem.

I think the amount of waste from the trawl fleet is a huge factor in why king salmon runs have been depressed for so long. I am curious about the ocean's carrying capacity for hatchery production, but it needs to be examined through thorough research, not by throwing something against the wall in the hopes that it sticks and fixes the problem.

The large percentage of all salmon gear groups that focus on hatchery-produced fish is great for sustainability because those fish being caught to sustain families relieves pressures that would otherwise be put on already depressed wild salmon runs.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Blake Bousley  
Ketchikan, Alaska



**Submitted by:** Angela Bowers

**Community of Residence:** SITKA

I respectfully ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system already operates under a science-based, permit-driven, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not arbitrary — they are established through a rigorous permitting process, continuously monitored, and adjusted when data show it is necessary. These proposals do not address a demonstrated failure in that system. Instead, they call for broad reductions or freezes based on generalized concern and unresolved scientific questions. This approach departs from Alaska's long-standing fisheries management model, which is built on responding to observed impacts rather than acting on speculative harm.

I worked in salmon hatcheries for nearly 15 years, from large commercial operations to a small facility at our local science center. Today, I teach university students about the important role aquaculture plays in our food systems, economy, and culture. I am also a subsistence and sport user who feeds my family with local salmon — many of which originate from hatcheries.

Singling out hatchery salmon releases as the primary cause of salmon declines in certain regions oversimplifies a complex issue. It may seem like an easy target, but the reality is far more complicated — especially for the many people whose livelihoods depend on these fish. Our marine and freshwater ecosystems are undergoing significant change due to warming waters, shifting ocean currents, altered predator-prey dynamics, and changing species distributions. Reducing hatchery releases will not address these broader environmental changes, nor is there evidence that doing so will increase wild salmon abundance or size.

Hatchery fish are essential to the stability of many coastal communities. Local processors rely on them. Organizations such as the Northern Southeast Regional Aquaculture Association (NSRAA) depend on them to operate. Many small-boat fishermen are able to remain economically viable because of hatchery returns. These fishermen support their families, pay mortgages, and cover vessel and harbor costs with income from these fisheries. Charter operators, sport anglers, subsistence users, and personal-use fishermen also depend on these fish, many without even knowing where those fish originated.

Reducing hatchery production would have ripple effects throughout the local economy. It would mean fewer fish for families and fewer opportunities for future workforce development. As someone involved in educating the next generation of aquaculture professionals, I am concerned that these proposals could reduce career pathways for my students.

Proposals 170, 171, and 172 would impose broad, preemptive reductions or moratoria on Alaska's private nonprofit salmon hatchery program without demonstrating a clear causal link between hatchery production and the conservation concerns they seek to address. In doing so, they would abandon Alaska's science-based, adaptive management approach in favor of sweeping regulatory action. This risks undermining fisheries stability, harming coastal communities, and setting a precedent for decision-making without demonstrated necessity.

For these reasons, I urge the Board to reject Proposals 170, 171, and 172.

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**Submitted by:** Rob Boyer

**Community of Residence:** Amchorage

Supporting proposals 163, 164, and 165. Please do something to reign in the excessive bycatch numbers. This indiscriminate method of killing all fish is literally wiping out fish stocks. As a lifelong Alaskan, I'm deeply concerned and saddened to see the disappearance of king salmon to our streams. Sport fishing for halibut has changed dramatically for the worse as well. Both species are being decimated by trawler bycatch. Please help end this so there are fish for the Alaskan people again.

---

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Bret Bradford. I am a commercial fisherman from Cordova and fish aboard the F/V Nerka.

A reduction in hatchery production would have severely negative impacts on my fishing operation and on the region as a whole. The hatchery program is self-funded. The revenue stream to operate hatcheries comes from returning salmon. If hatcheries reduce production, fewer salmon will return, which reduces revenue for hatcheries, reduces revenue for fishermen, reduces opportunity for sport and subsistence users, and reduces raw fish tax revenue for the State and local municipalities.

The impact would be immediate and extremely negative. I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Bret Bradford  
Cordova, Alaska



PC54

**Submitted by:** Joshua Brandenburg

**Community of Residence:** Sitka

I oppose proposals 170 171 172. Southeast Alaska communities rely heavily on the returning hatchery salmon.

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PC55

**Submitted by:** David Branshaw

**Community of Residence:** Cordova

I oppose proposals 170 and 171. As a PWS fisherman these proposals will adversely affect my ability to make a living as a commercial fisherman. Science based management should rule the day. Thank you for your consideration.

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PC56

**Submitted by:** Matthew Brazil

**Community of Residence:** Kodiak

I've been running a jog boat in Kodiak for 4 years now and it has been a substantial part of my livelihood. Last year it felt like we were cheated out of a lot of the quota by out of towners coming in and making illegal landings. It is very obvious what is going on, even today I saw a Russian guy from Homer taking a whole pallet of bait. He has only one jig machine and his longline reel set up. Very obviously was not going to be using that jig machine to harvest cod but was sure going to say this jig caught. Something needs to happen here, pretty unacceptable that rules are not being followed and no one is being punished.

---

**Submitted by:** Luke Brockmann

**Community of Residence:** Juneau, AK

i am writing in to show support for this proposition. requiring bottom contact monitoring equipment for pelagic trawl gear operated inside state waters will help better manage the fishery by showing the number of incidents that occur during fishing. it will help hold commercial fishing vessels responsible for violation regulations, and hopefully discourage vessel operators from fishing in areas with high potential for bottom contact. i predict the result these regulations being implemented will be a reduction in bycatch.

---

**Submitted by:** Luke Brockmann

**Community of Residence:** Juneau, AK

i am writing in support of this proposal. Establishing salmon excluder requirements for all pelagic trawl gear operated inside state waters should help reduce the amount of salmon bycatch in these fisheries. with several salmon populations crashing across the state, i believe we should take every step possible to curb this trend. this proposal might help prevent that trend from continuing. i feel if the trawl fleet wishes to continue operating in our state waters, they need to do everything possible to reduce the amount of bycatch.

---

**Submitted by:** Luke Brockmann

**Community of Residence:** Juneau, AK

i am writing in to show support for this proposal. the author has highlighted instances where the lack of exact definitions have resulted in what most would call "illegal harvesting". better defining allowable gear would help fishermen by clarifying what does and does not constitute a jigging machine. it would also help law enforcement by providing precise definitions pertaining to allowable gear. i feel this will also help keep our small boat fisheries more sustainable.

---

**Submitted by:** Luke Brockmann

**Community of Residence:** Juneau, AK

i am writing in support of this proposition. as a Alaska resident, I've watched our king salmon populations crash over the past two decades. i feel this proposal will help regulate sport harvest of our dwindling stocks. i feel limiting annual sport harvest is a great first step to rebuilding our king salmon populations. this will help prevent a smaller portion of users from taking more than others. leaving more fish in the water i feel will help stocks rebound.

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Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

My name is Zeke Brown. I am a lifelong resident of Cordova, AK where I sport, subsistence and commercial fish. My family and I participate in commercial fisheries for PWS salmon seine, Tanner crab, Shrimp, Black Cod, Halibut and tender for the Copper River Gillnet fleet.

**Proposal 162: Support Prohibit commercial transport services in subsistence fisheries**

We must protect subsistence users from highly competitive transporter services. Allowing the commercialization of subsistence fisheries through Transportors does not increase access; it actually reduces it by incentivizing highly efficient large commercial boats and gear to participate in subsistence fisheries where they easily outcompete traditional users.

**Proposal 168: Oppose Prohibit vessels from having more than one groundfish gear type**

I participate in sablefish and halibut hook and pot fishery and often have multiple types of groundfish gear aboard which this proposal would not allow. Fishermen need to be able to prosecute multiple fisheries in a single trip in order to maintain profitability and mix gear regulations like this make that impossible and unnecessarily driving up costs.

**Proposal 169: OPPOSE Create a definition of groundfish coil spring or 'slinky pot'**

This proposal creates regulation that is unnecessary and misguided and will only hamper innovation as fishermen attempt to create more efficient pots with less bycatch. Slinky pots were only able to be invented due to the very broad definition in regulation of a groundfish pot. There is no reason to define a slinky pot because there are no fisheries that are open only to slinky pots but closed to other types of pots. The slinky pot is by no means in its final form, fishermen continue to experiment with slinky pots, coffin pots, stackers, conventional hard pots etc. to find the most selective efficient design for their fishery and vessel. Attempting to define every style of pot is akin to trying to define every lure in a sport fishery.

I ask the board to use this opportunity to rescind 5 AAC 39.145. [5] slinky pots Escape mechanisms. The board passed this regulation at the 2023 statewide finfish meeting through proposal 153 substitute language in RC51. This substitute language was not available before the meeting and was passed with little or no stakeholder support or input. It requires two 18" rotten cotton openings in slinky pots vs the one opening required in every other style pot. My slinky pots are only 27" x 50", cutting two 18" holes in them severely compromises their web and is extremely burdensome as it requires twice the amount of rotten cotton replacement every year which is time consuming on 200 pots. There is no such requirement in federal fisheries where the majority of slinky pot fishing occurs. I am supportive of escape panels in pots to prevent ghost fishing and this regulation was passed with good intentions but a misunderstanding of the gear. I have no doubt that fish will easily escape a slinky pot with only one escape panel as the pots are light and roll around on the seafloor.

**Proposal 170,171,172: OPPOSE**

In my lifetime of fishing in PWS, I have seen extreme volatility in our wild salmon runs. While some of this is due to the ocean environment, our freshwater environments are becoming increasingly unstable as well. Many streams in Alaska are getting so hot that salmon are struggling to spawn, and the list of potential devastating changes to the spawning grounds is endless including low snowpack, melting glaciers, landslides, and earthquakes. Hatcheries are the only reliable tool we have to mitigate these shifts. In 2019, I saw streams across the Sound dry up completely while filled with fish that never had the chance to spawn. Hatcheries act as a vital safety net, providing a controlled environment that protects eggs from the lethal temperatures and droughts that are becoming our new reality.

While proponents of these proposals theorize about carrying capacity and straying impacts, they offer no solutions for the real-world havoc that climate change causes to our freshwater systems. These proposals represent an attempt to force a "time out" on our economy while we are already struggling with environmental shifts. If these supporters are so confident in their theories, will they be the ones to provide financial relief to the fishermen and coastal communities of Prince William Sound when their "precautionary approach" leads to a collapse of our salmon returns? Until they can offer a better tool than the hatchery system to combat the hot streams and drying riverbeds we face, they have no business trying to dismantle some of the only infrastructure that keeps our fisheries alive.

For fishermen like me, this isn't a theoretical exercise. Anyone advocating for closing or limiting hatcheries is advocating for taking away my livelihood, my daughter's college fund, my town's ability to fund its schools, and dooming wild salmon to the effects of climate change on our rivers and streams.

**Proposal 174 support *Allow the engine of a purse seine vessel or skiff to be shut off***

Did the oil companies write this regulation?

**Proposal 175 support *Modify dipnet mesh-size and configuration***

Dipnets are being used in catch and release fisheries all over the state as king salmon retention is not allowed. What information is available about catch and release survivability in dipnets is damning and points to using small mesh large diameter knotless web as necessary to avoid injury to the fish. Reducing mesh size is a minimum of what should be required. Knotless rubber mesh is used by sport fishermen all over the country to reduce handling injury in catch and release fisheries.

**Proposal 176, 177, 178 oppose *Allow anglers fishing from the same vessel to pool limits***

Party limits are not allowed for the very reason the proposer asks for them because they will increase harvest rates in sport fisheries. One skilled angler will be able to catch the limit of everyone on board even if they don't bother putting a line in the water. Sport fisheries do not exist as the proposer states for "food security of Alaska residents and nonresidents" that is what subsistence, and commercial fisheries are for.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Reuben Brown. I live full-time in Cordova, Alaska and work in the trades serving fishermen in Prince William Sound and the Copper River Delta, including refrigeration, machining, and fabrication work.

Less opportunity for fish to be caught and processed through Cordova directly reduces the amount of work available throughout the year as a tradesman. These proposals would reduce opportunity and therefore reduce income and economic benefit across the community.

Focusing on hatchery systems that have supported prosperity in the region for the past half century is not a sound approach without demonstrated cause. I would like to see more science on how both wild and hatchery fish around Prince William Sound recovered after the Exxon Valdez oil spill, and how those systems have coexisted long-term.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Reuben Brown  
Cordova, Alaska



March 2, 2026

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposal 186

Chairwoman Carlson-Van Dort and Members of the Board:

I respectfully urge the Board to reject Proposal 186.

Proposal 186 would permanently reduce, and in late July eliminate, drift gillnet fishing opportunity in Area 1. Although framed as a conservation measure, there is no stock of concern designation for coho. There is incomplete or missing escapement monitoring to justify this action, and no condition that existing management tools cannot address. It did not meet the standard, in the view of most, for out-of-cycle action, including the opinion of the Alaska Dept. of Fish and Game.

The proposal imposes fixed calendar restrictions regardless of run strength. That is not adaptive conservation management—it is a permanent reallocation of fishing opportunities. True conservation measures are tied to biological performance and escapement needs. Proposal 186 does not.

Allocative actions belong in the regular Upper Cook Inlet cycle, where impacts can be fully evaluated and competing interests weighed transparently. Advancing permanent allocation changes through the ACR process circumvents that framework and undermines predictability in fisheries management.

It is also unreasonable to require the public to bear the cost of participating in two Cook Inlet regulatory meetings in consecutive years to address what is plainly an allocative issue. Many stakeholders who may be impacted by decisions on this proposal will not be able to attend this meeting in Anchorage. Fishermen, crew, processors, and small business owners must leave their businesses, forgo income, and incur significant travel expenses to attend and testify. There is no emergency justifying that burden. This issue should be taken up at the regularly scheduled March 2027 Upper Cook Inlet meeting, and there will also be an additional season of escapement data to further inform the Board's decision making.

The Cook Inlet drift gillnet fishery is a cornerstone of the Kenai Peninsula economy. It supports permit holders, crew members, processors, marine trades, fuel docks, gear suppliers, lenders, and small businesses from Kenai and Soldotna to Homer.

Income earned during a short summer season sustains families and circulates locally year-round. Permanently removing peak July opportunity will directly reduce economic activity and stability in Peninsula communities already facing regulatory uncertainty.

Both the Homer Advisory Committee and the Kenai/Soldotna Advisory Committee voted unanimously in opposition to Proposal 186, reflecting clear regional concern that this proposal is neither biologically necessary nor procedurally appropriate.

For these reasons, Proposal 186 should be rejected. At minimum, it should be deferred to the March 2027 Upper Cook Inlet meeting for full consideration within the regular cycle and with opportunity for full public participation.

Respectfully,

A handwritten signature in black ink that reads "Steve Brown". The signature is written in a cursive, flowing style with a long horizontal flourish at the end.

Steve Brown

Homer, Alaska

**Submitted by:** John Burchfield  
Lucky Strike 2 charters  
**Community of Residence:** Juneau

To the Alaska Board of Fisheries,

On behalf of Lost in Alaska Adventures and the Juneau Charter Boat Operators Association (JCBOA), we respectfully submit the following comments regarding proposals scheduled for consideration at the March Board of Fisheries meeting.

#### Opposition to Proposal 170

We strongly oppose Proposal 170. This proposal would negatively impact Southeast Alaska residents and visitors who rely on salmon resources for commercial, sport, personal use, subsistence, education, and community benefit. The Douglas Island Pink and Chum (DIPAC) programs are integral to Southeast Alaska fisheries and community access, supporting commercial fisheries in Lynn Canal and Taku Inlet, sport fisheries for Chinook and coho near Juneau, personal use fisheries at Sweetheart Creek, and education programs at the Ladd Macaulay Visitor Center.

DIPAC has no intention of increasing chum production and is already maxed out on available water and land use. There is no evidence that Proposal 170 would provide a measurable benefit to wild salmon stocks, while it would clearly cause harm to existing fisheries, community programs, and access for Alaskans and visitors alike. DIPAC has worked collaboratively with ADF&G, NMFS, NOAA, UAF, USFS, and UAS for decades to study hatchery-wild interactions, including participation in the Alaska Hatchery Research Project. Existing research does not justify the restrictions proposed in Proposal 170.

#### Opposition to Proposal 172

We also oppose Proposal 172. A statewide moratorium on any increase in pink and chum hatchery egg take unnecessarily restricts future flexibility and adaptive management. Even where no increases are currently planned, such a moratorium removes important tools that may be needed to respond to changing environmental conditions, stock performance, or management needs. Alaska's hatchery programs already operate under a rigorous permitting and oversight framework, making this additional restriction unwarranted.

#### Support for Proposals 176 and 177

We support Proposals 176 and 177, which clarify and allow for pooling of bag and possession limits on a vessel. These proposals better reflect how fishing actually occurs in group and charter settings, reduce unintentional violations, and improve clarity for both anglers and enforcement. They are practical, common-sense adjustments that benefit lawful participation without increasing harvest.

#### Support for Proposal 178

We support Proposal 178. Clarifying bag limit attribution when assisting another angler helps prevent accidental violations and reduces unnecessary release mortality. This proposal is especially important in guided and charter fisheries, where crew assistance is common and intended to ensure safe, ethical, and successful fishing experiences.

#### Opposition to Proposals 179 and 180

We oppose Proposals 179 and 180, which would impose statewide annual limits on Chinook salmon. These proposals fail to adequately recognize the unique management structure of Southeast Alaska salmon fisheries, including the role of the Pacific Salmon Treaty. A statewide cap risks reducing opportunity for Southeast Alaska residents, visitors, and charter businesses without demonstrable conservation benefit, while creating unnecessary complexity and inequity across regions.

## Closing

Taken together, Proposals 170, 172, 179, and 180 introduce unnecessary risk to Southeast Alaska's balanced fisheries management system and threaten economic stability, community food security, and access for both residents and visitors. In contrast, Proposals 176, 177, and 178 represent thoughtful, practical improvements that enhance compliance and reduce unintended harm.

For these reasons, Lost in Alaska Adventures and the Juneau Charter Boat Operators Association respectfully urge the Board to OPPOSE Proposals 170, 172, 179, and 180, and to SUPPORT Proposals 176, 177, and 178.

Thank you for your time, consideration, and continued commitment to science-based, inclusive fisheries management.

Respectfully submitted,

Capt. Kevin Burchfield

Lost in Alaska Adventures

Juneau, Alaska

On behalf of the

Juneau Charter Boat Operators Association (JCBOA)

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**PC62**

**Submitted by:** Ashlynn Burgess

**Community of Residence:** Wasilla

I support Proposal 186.

Please help to protect the Silver Salmon run in the valley. As a fisherwoman, I want to be able to teach my young niece and future daughters to fish for salmon at a local valley river. However, with the recent runs I am concerned that silver salmon are quickly going the direction of the King Salmon. Fishing in the Matsu valley is part of our way of life, and I hope that this proposal can help sustain that way of life for future generations. I hope there are still salmon around for our children and our children's children. Thank you for your attention to this matter.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Reece Burnett, and I am an avid sport fisherman as well as a community member of local sport-fishing-focused industries in Southcentral Alaska.

These proposals affect me directly because they affect all of us in the industry, reducing harvests in quantity, quality, and efficiency. They would significantly reduce harvest opportunities and affect the ability of friends and family businesses to continue working as they have for decades, restricting their ability to provide for their community and their families, while degrading the fishery as a whole.

I believe these proposals would further degrade our fisheries as we have seen over the last 30 to 50 years, at an accelerated rate. It could also result in an inability for us and our community members to effectively contribute to the healing and development of the fisheries we rely on.

The evidence that is clear and should be focused on is the damage caused by ocean trawling and accepted waste limits that are harming the quality and sustainability of our fisheries, especially Chinook salmon. Hatcheries are one of the only effective ways we can add to fisheries quantity and quality without directly restricting commercial practices.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Reece Burnett  
Southcentral, Alaska



James R. Burton  
F/V Aurelia  
[REDACTED]  
Cordova, Alaska 99574

March 2nd, 2026

Marit Carlson-Van Dort  
Alaska Board of Fisheries  
PO Box 115826  
Juneau, AK 99811-5526

RE: Opposition to Proposals 170, 171, and 172

Dear Madam Chair and Members of the Board,

I am a third generation fisherman from Cordova, Alaska. I have fished for herring, salmon, crab and groundfish from Southeast Alaska to the Bering Sea for the majority of my life. I have been a sport and subsistence user of Alaska's fish and game resources my entire life. I have served as a Fish and Wildlife Aide and as an Alaska State Trooper in the Division of Fish and Wildlife Protection with duty stations in Kodiak, Fairbanks, Sitka and Anchorage. I have served the community of Cordova on City Council and in other roles.

I am married and the father of five children. My oldest daughter has fished with me for 9 years as a full time crewman participating in multiple fisheries. She is a 4th generation fisherman, and a permit holder and owner of her own vessel. Commercial fishing is not simply income for my family - it is a trade, a tradition, and a responsibility. I fully intend to pass this life to the next generation. That depends on sound decisions grounded in science, not regulation driven by speculation.

Some of you are new faces, some of you have read a version of this letter and others like it multiple times - because here we are, *again*.

I am writing in full opposition to Proposals 170, 171, and 172.

Taken together, these proposals:

- Mandate a 25% statewide egg take reduction
- Force Prince William Sound pink reductions tied to speculative stray thresholds
- Impose a statewide moratorium on future increases

All without demonstrating a quantified biological benefit to any specific wild stock.

That is not adaptive management.

Proposal 170 selects a 25% reduction.

Why 25%? Where is the modeling showing that 25% produces X measurable improvement in Y stock over Z timeframe? Where is the analysis showing that 24% is insufficient but 25% is effective?

There isn't one, because this is not a number tied to a biological benchmark. It is not tied to a demonstrated management failure. It is simply an arbitrary percentage.

If that standard is acceptable, then any percentage is acceptable.

That is policy by round number - not policy by science.

Proposal 171 presumes that Prince William Sound production must be reduced based on stray thresholds, even though straying is already monitored and managed under existing permit conditions. If ADF&G identifies a problem, they have tools to address it. A regulatory amendment should follow demonstrated management failure, not precede it. If the Department believes permit conditions are insufficient, it has the authority to amend them. That process should occur before the Board imposes a production mandate.

Proposal 172 imposes a moratorium on increases - regardless of region, performance, or scientific findings.

The Regional Planning Team process exists for a reason. 5 AAC 40 lays out a permit structure designed for scientific review and compatibility with comprehensive salmon plans. A blanket moratorium replaces case-by-case science with regulatory paralysis.

Precaution does not justify preemption.

Proposals 170 and 172, and other similarly worded proposals we've seen before, share the same underlying arguments behind them - ocean carrying capacity and competition.

If that theory is correct, then we must reconcile it with observable reality.

In the past decade, we have seen some of the largest sockeye returns in Bristol Bay history - occurring simultaneously with high North Pacific pink abundance. Better yet, let's talk about last year's Cook Inlet sockeye return shall we? The Kenai River saw one of its strongest sockeye returns in recent history, with over eight million fish returning to the system. The Kenai blew past its SEG and liberalized bag limits across the river system. That happened in the same ocean, under the same alleged carrying capacity crisis, with the same hatchery production levels these proposals claim are suppressing wild stocks. The irony here is hard to ignore - a principal author of these proposals represents the Kenai River. If hatchery pinks are overwhelming the North Pacific and suppressing wild sockeye, how exactly did the Kenai produce a return like that? Which is it - ocean competition is collapsing wild stocks, or the Kenai just disproved the premise?

Here's a snippet from the 2026 Cook Inlet salmon forecast: (spoiler - this forecast is larger than the one ADF&G issued in 2025)

*The Upper Cook Inlet (UCI) sockeye salmon total run forecast of 7.60 million fish (Table 1) is predicted to be **excellent**.*

So again, if the ocean is at or beyond carrying capacity due to hatchery pinks and chum, how do we explain record wild sockeye returns happening at the same time?

You cannot claim the ocean is full - except when it isn't.

Further, Alaska does not operate in isolation. So, before you impose statewide reductions, understand the scale of what you are regulating.

Russia produces pink salmon at a rate greater than Alaska - more than two to one in some years. Japan operates long-standing enhancement programs.

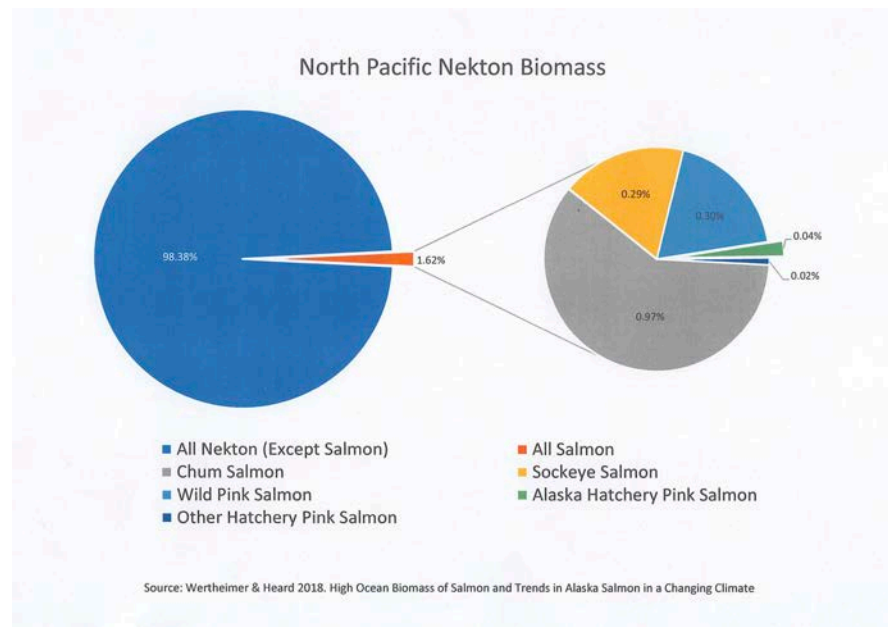
Why then, is the onus placed on Alaska hatcheries to bear the entire burden of the North Pacific? Salmon fry released into the ocean are in the *billions* yet Proposals 170 and 172 take zero consideration into the fact that this is a multinational industry, of which the State of Alaska is honestly *at least* a very distant second - to other countries over which the BOF has no control or jurisdiction. The Board may have jurisdiction over Alaska permits - not the North Pacific ecosystem as a whole.

Reducing Alaska production does not change Russian production. It does not change Asian production. It does not materially alter basin-wide biomass.

ADF&G's very own chief fisheries scientist Dr. Bill Templin is quoted in an article saying: *"While hatchery pinks may make up 10 percent of the adult pink, chum, and sockeye stocks in the North Pacific, that doesn't take into account the abundance of all the immatures and juveniles. If you add those to the numbers, the percentage of hatchery pinks becomes so small that it's not clear to me how reducing production will have any effect at all."*

<https://www.nationalfisherman.com/scientists-warn-pink-salmon-boom-threatens-other-species>

## Nekton Biomass - Scale Matters



Salmon - all salmon - represent approximately 1.62% of total North Pacific nekton biomass.

Pink salmon represent roughly 0.29–0.30%.

Alaska hatchery pink salmon represent approximately 0.04%.

Other hatchery pink salmon represent approximately 0.02%.

We are debating sweeping regulatory reductions over a fraction of a fraction of total ocean biomass.

If salmon comprise roughly 1-2% of total zooplanktivore biomass, and hatchery pink salmon represent well under one half of one percent of total nekton biomass, then the evidentiary bar for drastic regulatory action should be extraordinarily high.

It has not been met, not even close.

The idea that this small proportion of total biomass is singularly responsible for basin-scale ecological shifts requires far stronger proof than has been presented.

Correlation is not causation.

And speculation is not sufficient basis for a statewide 25% reduction, regional production cuts, and a permanent moratorium.

Regarding Proposal 171, research is ongoing. The Alaska Hatchery Research Project is active and ongoing. Genetic studies, marine survival work, stray analysis - all are underway.

Why would we impose permanent regulatory changes before the science is complete?

Proposal 171 attempts to convert a planning criterion into a mandatory production cut, as if a number printed in a comprehensive plan is the same thing as a demonstrated management

failure. The Alaska Hatchery Research Project is designed around Prince William Sound and Southeast Alaska interactions, and even ADF&G materials acknowledge Lower Cook Inlet was not included in that study framework. **“...the Alaska Hatchery Research Project (AHRP)... includes focused studies on hatchery-wild interactions of pink salmon in PWS and chum salmon in southeast Alaska (SEAK). Lower Cook Inlet was not included in the AHRP study.”** If the concern is straying into specific LCI systems, then address it with targeted monitoring, clear multi-year thresholds, and permit-condition tools that already exist - don't hardwire a permanent egg-take reduction mechanism into regulation before the science is complete.

This proposal hangs its hat on a “<2% over the long term” criterion and then treats it like a regulatory hammer. “Long term” does not mean one bad year, a small sample, or a handful of streams - especially when straying observations can vary wildly by stream and year depending on how and where sampling is done. If the Board wants a real solution, require standardized monitoring and a transparent multi-year trigger. Then let ADF&G adjust permit conditions and operations accordingly. A permanent production-cut mandate is the lazy option.

If uncertainty alone justifies contraction, then every fishery in Alaska is perpetually vulnerable to preemptive reduction.

That is not how this system was designed.

### ECONOMIC AND COMMUNITY IMPACTS

While science must lead, we cannot ignore the real-world consequences. Hatchery production supports commercial, sport, personal use, and subsistence fisheries. In Prince William Sound and Southeast Alaska, hatchery contribution to harvest value is substantial. Processors, tenders, fuel docks, welders, and small businesses depend on those fish.

We are already watching processor withdrawals, bankruptcies, and consolidation across Alaska.

Artificially reducing production without demonstrated conservation gain adds instability to an already strained industry.

The burden of proof should rest on those proposing disruption, not on fishing families to absorb harm while science remains unsettled.

In closing, the commercial fishing industry is not interested in sacrificing wild salmon for short-term gain. My five children's future depends on healthy wild stocks. But, these proposals do not provide quantified biological outcomes tied to their mandated reductions.

They replace adaptive management with arbitrary percentages.

They replace permit-based science with policy freezes.

They assume causation without demonstration.

That is not Alaska's management model.

I respectfully urge the Board to reject Proposals 170, 171, and 172 and allow the existing science-based framework to function as intended.

Thank you for your time and dedication to this process.

Sincerely,

James R. Burton



**Submitted by:** Wade Buscher

**Community of Residence:** Cordova

I'm a PWS/Area E commercial salmon fisherman (gillnet), and reside in Cordova, Ak.

Our Area E fisheries rely heavily on hatchery produced salmon to minimize the economic impact of low wild stock salmon returns that may occur in any given multi year cycle. I would say that at least half or more of my income comes from hatchery produced fish so any decrease in egg take would certainly affect my bottom line.

If any of these proposals (170, 171, 172) were to be implemented, not only would my income be affected, but the small service industries that support our local fishery would also be impacted. Cordova, not being on the road system and void of the economic benefits of large scale tourism seen in other parts of the State, relies heavily on the PWS fisheries as its main tax base. Any decline in hatchery production would have a significant impact on the local economy, disrupting what is already a marginal means of support of the town's coffers.

These three proposals (170, 171, 172) make the argument that a decrease or limitation in hatchery egg take will POSSIBLY enhance wild salmon stocks, and POSSIBLY reduce straying by hatchery salmon. The possibility that anything beneficial to wild stock salmon may be attained by reducing hatchery raised salmon is entirely unknown. What is known is that the specified 25% reduction in pink/chum egg take will certainly have a negative economic impact on the fishermen, the communities of PWS, and the State of Alaska.

Inherent in these proposals is the premise that Alaska PNP hatcheries have been detrimental to wild stock salmon populations. Referencing material to back their case, the Fairbanks Fish & Game Advisory Committee and Kenai River Sportfishing Association claim, "there is over-whelming evidence of negative impacts with very little corresponding, evidence to the opposite."

Whenever there is a supposed biased claim by an organization, we should be skeptical of where these claims are referenced from, for what purpose, and with what merit. If hatchery produced salmon are indeed having the detrimental effect on wild stocks that these proposals proclaim, then in all fairness there should be nothing less than the most thorough long term scientific study which is credible and without bias, a study that has not yet been concluded.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ronn Buschmann, and I am a retired commercial fisherman and a board member of the Port Armstrong Hatchery. I live in Petersburg, Southeast Alaska.

I would be directly affected by reductions in personal use coho returns to Crystal Lake hatchery. There would also be a decline in local economic activity as fishing and processing incomes decline. Petersburg is a rural community that depends on commercial fishing, and local harvest of returning fish to provide family food would decline.

Hatcheries provide a controlled environment during the part of the salmon growth cycle when fry are most susceptible to climate factors, including stream scouring from increasingly intense fall storms. Hatcheries help even out the effects of natural extremes.

These potential hatchery reductions appear to be a political statement rather than a science-based solution. Canadian fishery research has indicated hatchery releases have very little impact on natural fish populations. In some cases, hatcheries have become a repository for the genetics of threatened salmon river systems.

Fortunately, Alaska has not experienced the level of habitat degradation seen in the lower 48. Climate changes such as the "blob" that heated parts of the North Pacific a decade ago, general ocean warming, and increasingly intense fall "atmospheric rivers" reduce ocean fertility and destroy spawning beds, impacting survival. Ocean trawling has immeasurable impacts on wide-ranging salmon species.

ADF&G has a rigorous process for protecting natural systems from potential impacts from hatchery production, and some fisheries would cease to be economically viable without hatchery production.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ronn Buschmann  
Petersburg, Southeast Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kade Butler, and I am a commercial fisherman in Alaska. I fish aboard the F/V Anna Lee and operate through Alta Pearl Fisheries.

A reduction in hatchery production would affect my income stability, business viability, and my family's livelihood. These proposals would reduce harvest opportunity and have ripple effects on local businesses that depend on commercial fishing activity.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kade Butler  
Alaska



**PC68**

**Submitted by:** Jennifer Cabana

**Community of Residence:** Homer

I am opposed to any hatchery egg permit reduction for salmon.

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**PC69**

**Submitted by:** Larry Cabana

**Community of Residence:** Homer

I am opposed to any hatchery egg permit reduction for salmon.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Leroy Cabana, and I am a commercial fisherman and sport fisherman in Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals threaten my family's livelihood and would result in the loss of common property harvesting opportunities and economic stability.

It takes a semi-fixed cost to operate a hatchery. Reducing fry numbers will directly affect returning adult hatchery numbers, and any reduction will directly impact the available surplus of hatchery salmon. There is no general consensus that hatchery-raised salmon are detrimental to wild salmon stocks. In Prince William Sound, there are 45 years of history with hatchery salmon, and the natural wild runs lately are as strong or stronger for pinks, chums, and sockeye. It is ridiculous to confirm that wild salmon stocks are as large or larger than before hatchery salmon were introduced and then conclude that hatchery salmon are harming wild salmon returns.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Leroy Cabana  
Alaska



**Submitted by:** Joanne Cabe

Joanne & Richard Cabe

**Community of Residence:** Thorne Bay

My husband is a commercial power troller in SE AK [specifically Thorne Bay] he also does some subsistence harvesting in the off season. I am disabled, so my husband's fishing income is crucial to our livelihood. Alaska's fisheries board includes members with experience & knowledge, they aren't allowed to vote if they have any ties to the industry, to prevent conflicts of interest. If they aren't allowed to advise the other members & political board members, their vast experience is being wasted.

Alaska's hatchery system is governed by a science-led, permit-based, adaptive management framework administered

by ADF&G. Production levels are established through permits, reviewed continuously, and adjusted when data demonstrate need. Proposals 170, 171, and 172 do not respond to a demonstrated failure of that system — they impose reductions or freezes based on generalized concern and unresolved scientific questions. If uncertainty alone

justifies mandatory reductions, then no enhancement, harvest, or management program in Alaska could continue to operate

Alaska does not need to abandon its science-based hatchery management system to address unsubstantiated concerns and uncertainty. The Board of Fisheries should reject Proposals 170, 171, and 172 and instead allow ongoing research, adaptive management, and site-specific responses to continue doing what they were designed to do: protect wild salmon while sustaining fisheries and communities.

**SUBMIT PUBLIC COMMENT**

Submit public comment by 11:59 PM AKST, March 2, 2026. [Click here to s](#)

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**Submitted by:** James Calhoun

**Community of Residence:** Homer, AK and Port Lions, AK

I'm a fourth generation commercial salmon fisherman in Kodiak and oppose Proposals 170, 171, and 172. I grew up fishing the Kitoi Bay hatchery and have continued to do so for over 30 years. It has been a key part of our harvest, helping to level the ups and downs of our seasons. Cutting hatchery production would directly hurt my family's livelihood, as it would for so many folks who work jobs associated with our industry. Please consider the negative impacts proposals 170-172 would have on families and businesses that rely on hatchery salmon and reject them.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Norman Campbell, and I am a commercial fisherman, subsistence user, and local resident in Alaska. I fish aboard the F/V Gale Force and am affiliated with the Eyak and Chugach Corporation and the Native Village of Eyak.

My concerns center on money and food security for my family and community. Proposals 170 and 171 are wrong, and I strongly oppose them. These proposals would negatively affect my ability to make a living and to provide food.

These proposals are wrong because they would harm fishermen and communities without delivering meaningful benefits. A better approach is needed that protects both livelihoods and fish stocks.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Norman Campbell  
Alaska



# CANFISCO GROUP USA

A Division of the Jim Pattison Group

March 2, 2026

Ms. Märit Carlson-Van Dort  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: Canfisco Group comments opposition to Proposals 163-164, 170-172, and 186**

Dear Chair Carlson-Van Dort and Board of Fisheries Members,

The Canfisco Group comprises several seafood processing companies united by common ownership and purpose. Our group operates 11 seafood processing plants in Bristol Bay, Kenai, Kodiak, Yakutat, Sitka, and Ketchikan, employing 4,000 workers and supporting 1,750 independent fishermen each year.

**Proposals 163-164 would effectively eliminate trawling in the Gulf of Alaska region of state waters by redefining all pelagic trawl gear as bottom trawl gear, which is prohibited in this region.** Additionally, proposal 163 creates a requirement for monitoring technology that is not currently viable for commercial fishing conditions. Sensors are being tested in trawl fisheries in federal waters; many give poor data, and none have proven to be able to withstand Alaska's environment or impact with a vessel during gear retrieval long term.

Only a small portion of the Gulf of Alaska state waters is open to trawl fishing. Approximately 7% of the total pelagic trawl caught groundfish in the Central Gulf is caught in state waters in either the state managed PWS pollock fishery or parallel fishery against the federal TAC. While this is a small area and percentage of landings, it is critical for small vessels 58' and under.

The NPFMC revised the pelagic trawl gear definition in June of last year, largely to facilitate the use of salmon excluders, and it is expected to be implemented in 2026 or 2027. As many vessels fish in both federal and state waters, it would be best if gear definitions were consistent across both areas.

**Canfisco Group is opposed to Proposals 170-172 seeking to reduce or limit chum and pink salmon hatchery production,** with no evidence of Alaska hatcheries causing harm to wild salmon populations, and clear evidence that the proposals would harm all salmon users.

On average from 2018-2023, Alaska's private nonprofit hatcheries provide 4,200 annualized jobs and \$219 million in labor income annually, \$3 million in tax revenue, \$103 million in ex-vessel value to fishermen, and \$346 million in first whole-sale value. In these years, hatchery salmon accounted for 16% of the total value of Alaska's salmon harvest. Alaska's hatcheries also contribute a minimum of 192,000 salmon for sport, personal use, and subsistence users. This count is likely significantly underestimated due to limited sampling by ADF&G and limited tagging of coho salmon<sup>1</sup>.

<sup>1</sup> McKinley Research Group LLC, Economic Impact of Alaska Salmon Hatcheries, [https://ssraa.org/wp-content/uploads/2024/04/MR\\_Hatchery\\_WEB.pdf](https://ssraa.org/wp-content/uploads/2024/04/MR_Hatchery_WEB.pdf)



# CANFISCO GROUP USA

A Division of the Jim Pattison Group

Hatchery pink and chum salmon are important to our Southeast and Kodiak operations by providing volume and stability to keep plants operating, particularly in years of lower wild returns. This production ensures our plants remain viable to offer markets to not only our salmon fishermen, but to all commercial fisheries. Processors and fishermen have made significant investments in their businesses and need long-term stability, and depend on the economic activity provided by hatchery programs.

Chum production sustains revenue for additional hatchery programs. At DIPAC, NSRAA, and SSRAA in southeast Alaska, this is the only species that generates a profit. Sockeye, coho, chinook, and educational programs all operate on a deficit covered by the income from chum rearing programs. These additional programs benefit all user groups, including personal use and subsistence fishermen.

Canfisco Group supports hatchery production management through the Regional Planning Team (RPT) process, which is led by ADF&G and open to the public. The RPT facilitates a rigorous permitting process for egg take and release sites. These meetings include representatives from private nonprofit hatcheries, ADF&G staff, and industry groups. Additionally, there is rearing site permitting oversight by the Department of Natural Resources and the Department of Environmental Conservation. If a permit is deemed worthy after this extensive review process, it becomes subject to the ADF&G commissioner's approval, amendment, or disapproval. In the last year, Commissioner Vincent-Lang used his authority to amend hatchery production at NSRAA in southeast, and directed the RPT to review all release sites and develop a report.

ACR5 should not have been accepted as a proposal. ADF&G comments found that it did not meet any of the criteria to be accepted<sup>2</sup>. Criteria to 'address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted,' was misused by the Board in regard to management in the EEZ, the size of the sockeye run in 2025, and the use of the 1% rule (which was not even mentioned in the ACR).

This October, during the Work Session, the Board will see Cook Inlet escapement goals and 'stock of concern' recommendations, prior to the 2027 Cook Inlet regulatory meetings. The Work Session meeting would be the appropriate time to review escapement, designate any 'stocks of concern', and begin creating action plans, if necessary. This is the process used for every other region of the state and would be the most predictable way to ensure the public is aware and participating. **Proposal 186 should be rejected, and coho escapement should be addressed in cycle.**

The ACR was submitted as an effort to conserve coho returning to the Deshka River and Little Susitna Rivers in Northern Cook Inlet, however, the management plan is not tied in any way to coho abundance. It creates a permanent closure without the ability to adjust time or area in response to actual coho harvests.

The Deshka and Little Susitna Rivers have failed to make escapement in recent years, however, we have several years of incomplete counts. ADF&G comments state they have concerns for escapement to these rivers and that

<sup>2</sup> ADF&G (Alaska Department of Fish and Game). 2025. Alaska Department of Fish and Game staff comments on Agenda Change Requests, Alaska Board of Fisheries meeting, Anchorage, Alaska, October 28–29. Alaska Department of Fish and Game, Regional Information Report No. 5J25-03, Anchorage.



# CANFISCO GROUP USA

A Division of the Jim Pattison Group

they have ‘managed all fisheries conservatively to allow for passage of coho salmon to these and other Northern Cook Inlet drainages.’

The Deshka River coho salmon weir counts have been incomplete since 2020 and represent a partial count of the actual coho salmon escapement. In 2025, flooding conditions ended the Deshka River weir operations for only the last 2% of the run (based on historical run timing) but 38% of the run was counted on the last day of operation.

The Little Susitna coho salmon weir counts were incomplete from 2021–2024. In 2025, the Little Susitna weir was moved from its original location at river mile 32.5 to river mile 39.5. Low water conditions slowed the coho salmon passage through August, followed by high water, which prevented counting from August 30 until September 1 due to safety concerns.

The only coho index streams in Northern Cook Inlet that were able to be fully counted in recent years, Fish Creek and Jim Creek, have made or exceeded escapement<sup>3</sup>.

Last year, the Joint Legislative Task Force Evaluating Alaska’s Seafood Industry held 10 meetings and heard testimony from 74 participants who contributed 38 presentations on how the state can support the seafood industry<sup>4</sup>. They repeatedly heard Alaska’s commercial fishermen, processors, and fishing dependent coastal communities need stability. Passing any of these proposals to eliminate trawl fishing in state waters, reduce hatchery production, or close the largest state waters district in Upper Cook Inlet in July undermines efforts to provide stability.

Thank you for the opportunity to comment,

*Megan O’Neil*

Megan O’Neil  
Director of Government Affairs  
Petersburg, Alaska

<sup>3</sup> ADF&G (Alaska Department of Fish and Game). 2026. Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals for statewide finfish and supplemental issues, Alaska Board of Fisheries meeting Anchorage, Alaska, March 17–21, 2026. Alaska Department of Fish and Game, Regional Information Report No. 5J26-03, Anchorage.

<sup>4</sup> [https://www.akleg.gov/basis/get\\_documents.asp?session=34&docid=397](https://www.akleg.gov/basis/get_documents.asp?session=34&docid=397)



TO: Chair Marit Carlson-Von Dort  
Alaska Board of Fisheries

February 26, 2026

FROM: David J G Capri  
[REDACTED]  
Newport, OR 97365

RE: Proposal #11

Madam Chair and Members of the Board:

My name is David Capri and I am writing in support of Proposal #11 which would close ground fish trawling inside state waters west of 170 W. longitude in the Aleutian Islands.

I fished for 28 years in Alaska in the crab fisheries from Kodiak, the Bering Sea, St. Matthew, Norton Sound and in the Western Aleutians.

I invested into the F/V Alaska Trojan in 1989 and have since been partners with Ted Painter. I will speak in plural going forward as this letter represents the opinion of both Ted Painter and myself.

Our vessel has been actively involved in the golden king crab fishery since 1991. Much of the areas we are fishing today are still the same areas that I began fishing in 1981 on the F/V Rondys.

Closures were in effect from 1991 through 2013 in order to protect the Steller Sea Lion population. These regulations have been modified throughout the years. Since the closures were relaxed in 2014, we have witnessed factory trawlers moving inside state waters, which are critical habitat areas for golden king crab.

Over the years we have witnessed a large amount of sub-legal crab and females in these areas as they are used for breeding grounds. We attempt to actually avoid these areas with sub-legal males and females and focus in on areas where we see legal male populations flourish. This results in less sorting, but most importantly not lifting pots that won't produce legal males.

Over the past 5 years we have seen a huge increase in the amount of time the trawlers are spending working in these crucial areas. In the past, they were in and out within a few months. Now they are present throughout the year.

We have been forced off some of our most productive fishing grounds to prevent loss of gear to trawlers. This year we were sent emails from trawlers asking our captain to move crab gear, currently fishing, that had been in the water for two months.

Over the most recent 5-year period, our vessel lost an average of 22 pots per year due to trawler activity. It is important to state that this is after the “Line File Sharing Agreement” made with the trawlers, 5-6 years ago, sharing all line files of our gear being fished.

The cost to replace one 40 pot string is as follows:

Item:	Cost/Unit:	Total Cost:
5½ X 5½ Pot	\$1,750.00	\$70,000.00
Groundline	40 units	\$14,470.00
Buoys/Hard	\$137.00	\$822.00
Buoys/Polyforms/A4	\$87.00	\$348.00
Triggers	\$65.00	\$2,600.00
C-Links	\$29.00	\$1,160.00
Bait Jugs	\$6.50 X2	\$520.00
Bait Bags	\$5.99	\$239.60
Bridles	\$20.00	\$400.00
Lid Hooks	\$20.00	\$800.00
TOTAL Replacement cost for a string of 40 pots:		\$91,359.60

At an average of 22 pots per year, at \$2,283.99 per pot, that is \$50,247.78 loss each year. This doesn't include all of the crab that cannot be harvested throughout the season in that lost gear.

We see a dramatic drop-off of our Catch Per Unit of Effort (CPUE) as soon as the trawlers appear working in these areas. Due to the roller/hopper gear system that they use, it creates a thoroughfare of destruction on the bottom. This

doesn't just affect the golden king crab fishery, but all other fisheries that rely on this fertile, fragile habitat.

In recent years, we have witnessed our Total Allowable Catch (TAC) in the Western Aleutian Golden Crab (WAG) continue to decrease. We believe that this is a direct correlation with the fact that intensive trawling is occurring in areas where 88% of the golden king crab are being caught. The trawl activity affects our CPUE, which in turn affects the TAC that is set for each season.

The TAC for the WAG in recent years are as follows:

2019-20	2.9 Million Lbs.	Starting Point
2020-21	2.66 Million Lbs	-240,000 lbs
2021-22	2.088 Million Lbs	-572,000 lbs
2022-23	1.73 Million Lbs	-358,000 lbs
2023-24	1.81 Million Lbs	+80,000 lbs
2024-25	1.12 Million Lbs	-690,000 lbs

Since the 2019-20 season the TAC for the WAG has been cut 1,780,000 lbs.

In conclusion, we are asking for your consideration to protect the state waters in this area, as they are protected in other areas of Alaskan State Waters. This is not just for the health of the golden king crab stock, but for all fisheries impacted and for future generations to come.

Respectfully,

David JG Capri



**Submitted by:** Rex Capri

**Community of Residence:** Newport, Oregon

I'm writing to comment on Proposal 11. I was a rotating captain on the F/V Alaska Trojan fishing the Western Aleutian Golden King crab for a lengthy period of years. At times we would have factory trawlers working close to our fixed crab strings. We would always try to give them the readings of our strings so they would stay off of them. But there were times hauling gear, we'd come across missing pots or a missing section of a string. Occasionally a Black Cod or Halibut boat would come out to fish by us but, these boats were too small to strip pots off our strings or tear a section out of one. We shared string location info with them also. There were times we could see the factory trawlers on Radar and AIS working close to our gear. To hook our gear, trawlers would have to be dragging their nets on the bottom because that's where our gear is and groundline between pots is stretched tight and not floating up. Because of the damage to another fisheries gear, this is one reason to eliminate trawling in Western Aleutian state waters.

Another reason is because these crab have evolved over time to feed on living and dead members of the fish stocks that the trawlers are targeting. These crab live in fairly narrow depth bands because of the steep drop off of most of these islands. If significant amounts of the fish stocks that the crab have evolved to depend on are removed from these areas, it will MOST likely have a detrimental effect on the crab stocks. This is a very significant reason for eliminating trawling in these state waters.

My hope is that you will strongly consider the reasons I've stated above and pass Proposal 11. We should not let one fishery damage or destroy another fishery.

Thank you!

Sincerely,

Rex Capri

**Submitted by:** Herbert Carino

**Community of Residence:** Cordova

Oppose to 170,171,172

**Submitted by:** Mary Cris Carino

**Community of Residence:** Cordova

171,172

**Submitted by:** Anita Carpenter

**Community of Residence:** Kodiak

I am in support of proposals 166 and 167 as amended by the KRC.

Jigging machines need to be clearly defined and the only allowable gear type on board vessels participating in the pacific cod jig fishery.

This will prevent vessels from fishing illegally with other gear types.

March 1, 2026

To the Alaska Board of Fisheries

My name is Leonard Carpenter and my family and I have participated in Kodiak Area Jig fisheries for over 25 years.

As long term participants we rely on this fishery to provide for our family and it represents a considerable portion of our yearly income.

**We fully support Proposal 166 and Proposal 167.**

**Proposal 166** clearly defines a mechanical jigging machine and differentiates it from other gear types that could be loosely interpreted as being used as a mechanical jigging machine. The language in Proposal 166 is well written and clearly describes the size and form of jigging machines in use for the last two decades.

It should be adopted without any amendments.

**Proposal 167** is also well written and will allow fisheries enforcement the tools to ensure our jig fishery is conducted in a legal, fair manner. To ensure all vessel operators participating in the Kodiak Area Jig Fishery play by the rules, only jig machines as defined in Proposal 166 should be allowed onboard while transiting to and from the fishing grounds, while engaged in fishing and while offloading their catch.

Any other equipment, implements or gear used to harvest fishery resources should not be allowed onboard while participating in the Kodiak Jig Fishery.

This will prohibit pot gear, slinky pot gear, fixed longline gear (tub gear), snap-on longline reels, seines, gillnets and trawls to be onboard vessels participating in the jig fishery and remove the temptation to cheat at the expense of other jig fishery participants.

It should be adopted as amended by the KAC.

Thank you for your consideration.

Leonard Carpenter  
F/V Fish Tale F/V Emerald Isle  
Email: [REDACTED]

PC81

**Submitted by:** Matthew Carpenter  
**Community of Residence:** Kodiak

I've been a longtime fisherman in Kodiak, Alaska. I grew up jigging on our 35' boat. Together with my parents and my brother, we rely heavily on the jig fishery. I fully support p166 and p167 with amendments.

We have heard about and been suspicious of cheaters taking advantage of the jig quota, using other gear types to get a leg up and steal the opportunity from others. These proposals will help keep the playing field fair and equal for everyone.

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PC82

**Submitted by:** Tristen Carpenter  
**Community of Residence:** Kodiak

My name is Tristen Carpenter, I've been jigging with my dad and brother for nearly a decade. I fully support proposal 166 without amendments and proposal 167 with amendments because I want everyone to have an opportunity to catch fish on equal footing. When vessels use non-jig gear it results in rapid exhaustion of the jig quota and denies legitimate jiggers a fair chance to catch enough fish to sustain themselves and prosper, so these proposals are needed to clearly define what gear is legal to use and to prevent other types of illegal gear from being used for jigging.

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PC83

**Submitted by:** Marc Carrel  
**Community of Residence:** Cordova

Esteemed members of the Board of Fish,

I am a resident of Cordova and am opposed to proposals 170, 171 and 172 because hatcheries are a critical part of the economy of my small coastal community. The Alaska Department of Fish and Game already successfully regulates the hatchery program in Alaska to ensure limited environmental impact. Proposals 170-172 restrict hatchery operations in ways that the Department has deemed unnecessary in its staff comments, while causing immediate economic harm to small coastal communities throughout Alaska.

Furthermore, 78% of hatchery Chum in the North Pacific are from Asian hatcheries. Hatchery production in Alaska is modest in comparison to the hatchery programs in Russia, Japan and South Korea (See attached Figure 1). Reducing hatchery production in Alaska will not change the makeup of salmon populations in the North Pacific, while having a devastating effect on Alaska's rural economy.

Therefore, I urge you to vote No on proposals 170-172.

Sincerely,

Marc Carrel

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Doug Carroll, and I am a commercial fisherman, subsistence user, sport fisherman, and community member in Prince William Sound, Cordova. I fish aboard the F/V Miss Carroll and the Deja Vu.

I have been commercial fishing in Prince William Sound all of my life, and it is part of my life and my way of life. A decrease in hatchery production would be devastating to my family, the towns of Prince William Sound, and the majority of the infrastructure in the region. Commercial fishermen have already been struggling in recent years due to market conditions. While markets appear to be improving, a significant decrease in fish volume would be crippling.

Cordova is already struggling to maintain services. Silver Bay Seafoods has decided not to process fish in Cordova this year due to a low forecast, which is already a blow to the city. This results in fewer summer jobs and significant loss of fish tax. A reduction in hatchery production may encourage permanent closure of processing facilities, which would be a severe blow to the community.

Hatcheries have been producing fish in Prince William Sound since the 1970s. There have been good and bad seasons since then. We do not always know why survival rates fluctuate, as natural cycles play a role. Making cuts in hatchery production without evidence supporting those cuts is not consistent with Alaska's proven management policies.

If runs recover after reductions are made, it may be a coincidence rather than causation, leading to false conclusions about the effectiveness of the cuts. The ocean is complex, and there are factors we simply cannot control. Reducing hatchery production without clear evidence of benefit is a dangerous course.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Doug Carroll  
Prince William Sound - Cordova, Alaska



**Submitted by:** Janet Carroll

**Community of Residence:** Homer

To the chair and members of the Alaska State Board of Fish. I would urge the board to take no action on proposal 186 and address this proposal in cycle at the 2027 Upper Cook Inlet Finfish regulatory meeting. Taking up proposal 186 out of cycle and out of context will not allow for the informed decision making process that we expect from the Board of Fish. The content of proposal 186 needs to be part of the group of proposals addressing the Upper Cook Inlet Salmon Management plan at the in cycle, 2027 Upper Cook Inlet Finfish meeting. By addressing the proposals regarding Upper Cook Inlet salmon as a whole, it allows ADF&G to make fully informed science based conservation decisions regarding every species of Upper Cook Inlet Salmon.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Stephanie Carroll, and I live in Homer, Alaska. I am a commercial fisherman in Prince William Sound. The salmon seine fishery is the main source of income for our family, and we own the F/V Amber Dawn.

Fishing has been our livelihood for more than 30 years. The hatcheries in Prince William Sound have been a key component of the resources available for harvest. A reduction in hatchery production would mean less income for our family.

Reduced production would lead to less opportunity for fishermen and would also impact processing jobs and local businesses, particularly those in the marine trades. Valdez would feel the impacts in the sport sector as well. Many in the community also rely on hatchery fish for subsistence needs, and Alaskans statewide could feel the effects of these reductions.

A reduced egg take would create hardship for those who rely on salmon for their income, including young Alaskans with boat and permit payments. Reducing hatchery production makes it even harder to make a living in a fishery already facing rising costs.

I am concerned these proposals are another attempt to find a simple explanation for why chinook salmon in particular have been struggling. Alaska hatcheries are well managed, and there are many ocean factors that need research before making rash decisions. The ocean is constantly changing. To suggest hatcheries are the cause without research to support that claim is irresponsible and could have catastrophic effects on our state. We should be studying other factors that may be negatively affecting our oceans.

If hatcheries were driving declines in wild runs, I believe we would see that in Prince William Sound; instead, we have had multiple years with record returns of wild fish. Hatchery and wild fish coexist in our region. Hatcheries help us feed Alaskans without putting excessive stress on existing wild runs. Strong salmon equals a strong Alaska.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Stephanie Carroll  
Homer, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Weston Carroll, and I am a commercial fisherman based in Homer, Alaska. I operate the F/V Amber Dawn, a salmon seine vessel in Prince William Sound.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I grew up fishing salmon in Prince William Sound with my father and eventually got my own seine boat in the late 1990s. I have seined for salmon in Alaska ever since. In the last two years, my son now also runs a boat seining in Prince William Sound. The salmon fishery is our primary source of income, and hatchery production is a major component of our fishery. Reductions to hatcheries would be devastating to our family's livelihood.

All types of fishing benefit from the hatcheries — commercial, sport, and subsistence. In several towns near hatcheries, they have fish derbies that bring tourists to town. When the hatcheries are successful and fishermen have a good season, it has significant impacts on the entire community.

Reducing hatchery production without science-based conclusive evidence sets a bad precedent and could potentially have significant negative financial impacts on many Alaskan fishermen with no conclusive evidence showing it would have any statewide benefits.

These decisions should be left to Fish and Game and the existing process, not left up to special interest groups pushing their agenda. The primary areas of concern are in Western Alaska, a long way from where the hatcheries are located. It seems like it would make more sense to look for potential impacts closer to their region instead.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link

between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Weston Carroll  
Homer, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Maia Carter, and I am a community member in Sitka, Alaska. Living in Sitka, everyone has ties to someone who works in a fishery or a hatchery. I currently serve as an educator at the Sitka Sound Science Center, which hosts a very small, educational hatchery. Our hatchery teaches aquaculture classes to high school and college students in Sitka, along with visiting groups from across the state.

These guidelines have no significant research-driven backing, and the reduction would make it nearly impossible to provide these educational courses to the community. These changes would mean fewer jobs and ripple effects that impact harvesting and the broader community.

We should be considering research-driven, Alaska-specific policy changes. It scares me to think that this policy is being considered without the proper preparation.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Maia Carter  
Sitka, Alaska



**Submitted by:** Robert Carter

**Community of Residence:** Kodiak

Dear BOF, Chair and board members,

My Name is Robert Carter, i'm the owner operator of the F/V Faith.

I've lived in Kodiak since 1984 and have fished Kodiak waters since 1987 and i am in FAVOR of proposal 167 and proposal 166.

Jigging cod is a valuable resource for Alaska and our small coastal communities, not just in terms of product landed at the dock, but in terms of opportunity for young and aspiring fishermen, as an affordable entry level fishery.

Jigging was once my only fishery, but jigging has allowed me to expand my operation into crabbing and salmon.

Without a viable jig fishery i would still be forced to crew on other vessels.

During the winter months of January, February and early March, cod are typically deeper and more dispersed.

Jigging during these months can be difficult. Most vessels have 4 jig machines, but fishing in 40 fathoms or deeper means frequent tangles and few fish. Lot of guys will only use two, or even just one machine if going this deep or deeper.

Cod also typically don't bite jigs once it's dark.

Landings of jig caught cod during these months typically reflect that fact.

As cod shallow up in spring and days grow longer, landings increase.

Longlining on the other hand can be fished 100s of fathoms deep and is laid out over several miles of bottom and be fished day or night in any weather.

During the 2025 cod jig season, this pattern of smaller deliveries in these months held true for a majority of the jig fleet, but for a handful of vessels recently done with the longline fishery and still carrying all their longline gear as well as slinky pots onboard, this pattern didn't seem to apply.

These few boats were delivering deckloads of cod.

I myself, personally witnessed handfuls of longline snaps and hooks that the offloaders at our cannery had pulled out of fish after one of these unusually large "jig" deliveries.

I was not only person to notice these things and it caused a LOT of anger in the fleet.

One vessel coming in deckloaded was witnessed with several longline snaps still hanging out of the fish's mouths. The person witnessing this called the Alaska State Troopers.

AST boarded this vessel and witnessed longline gear on board the vessel, as well as slinky pots laying about the deck.

I had a discussion with troopers about the issue and was told that despite suspicions, it was not illegal to carry multiple gear types on board and unfortunately AST could not do anything further unless they were caught in the act hauling, which is extremely difficult.

2025 ended up as one of my worst years, as well as everyone else i talked to.

It was over before it began. It was over before Cod began to shallow up where jig fishermen are really able to target them.

While those fishing illegally will find many ways to do so, short of 24/7 surveillance of thousands of miles of ocean, passing proposal 167 is the most cost effective and common sense way to help rein in illegal activities in the jig fishery.

Proposal 167 at least gives enforcement agencies tools they can use to help curb and prosecute illegal fishing.

Proposal 166 defines what is a jig machine and excludes longline reels from legally defined gear.

As an Alaskan resident and fisherman of over 40 years who relies on the jig fishery to earn a living for myself and my crew, i ask that you please pass these resolutions.

Thank you,

Robert Carter - F/V Faith

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PC90

**Submitted by:** Carmel Carty

**Community of Residence:** Kodiak

Alaska Board of Fisheries

Alaska Department of Fish & Game

PO. Box 115526

Anchorage, Ak 99811-5526

March 2nd 2026

Ref: Oppose Proposals:11,163,164,165,170, 171,172

Dear Chairwomen Carlson-Van Dort, and members of the board

My name is Carmel Carty McCarthy; I live in Kodiak and am a mom to 7 kids ranging in age from 16 to 35. I inherited a commercial fishing business, which my husband Peter and I started in 2003. Unfortunately, due to brain cancer in 2016, he was forced to step out and I stepped in. Having found myself a widow and single parent of young kids, skippering our vessel wasn't an option. I lacked the skill, knowledge, and confidence to walk into a wheelhouse and do what needed to be done. I've been blessed to have an exceptional fisherman step up to not only skipper my Trawler, but to be an advisor, confidant and in so many ways a partner in my business.

Peter, my late husband, fished and tendered Alaska waters from Prince William Sound to

Kodiak, Kodiak to Akutan to Port Moller, from his arrival to Kodak in 1989 until his death in 2016. In 2008 we bought the F/V Stella, a 58-foot vessel and converted her to a trawler. In 2013 we sponsored her from 24ft to 32ft wide, making her one of the first of her kind in Alaska and one of the infamous Super 8's. Due to her new size and our newfound confidence in her safety and abilities we have been able to participate in various trawl fisheries around the State that in years prior we were unable to do.

My vessel crew are all Kodiak family fishermen, some born and raised and others that have come to call this beautiful place home, same as myself. My business generates income to other local business, their employees, and families by way of processors, welding, diving, marine supplies, net repairs, hydraulics, electrical, refrigeration and countless others that in one way or another have a mutual benefit in our fishing business.

We harvest a third of our annual fish revenue inside of 3 miles with pelagic gear in the Western Gulf Pollock fishery. In Kodiak and the central gulf, we harvest a large portion of our fish with pelagic gear inside of 3 miles and weather permitting (we are still a 58ft vessel) in PWS – state waters we harvest pollock with pelagic trawl gear.

I am writing to oppose proposals 163,164 and 165.

In the 10 years since I have taken over our fishing business, it seems to me that I am constantly having to defend my trawl operations against uninformed groups and individuals. I listen to countless hours of scientific research offered at the NPFMC meeting to educate myself. I listen to the people who know nothing about trawling and fishing, tell me "How it's done".

What I do know is that I have spent thousands of dollars on nets, trawl doors, main wire and have no intentions of putting my gear on the rocky bottom.

While I oppose proposal 165, I use a salmon excluder while fishing by my own choice even in the absence of the States lack of a mechanism for monitoring and enforcing excluder use.

I strongly oppose proposals 170,171,172

We as a fishing business have come to depend on the salmon fisheries to supplement our income through tendering, while providing an invaluable service to both the salmon fleet and to the canneries. Alaska's hatchery program supplements pink and chum stock around the state based on science. I don't believe that the States hatchery program in anyway has any negative impacts, quite the opposite. The program benefits all Alaskans, our coastal communities, and its respective economies.

I strongly oppose Proposals 11

I don't believe it is enough to be "concerned" in requesting the board close state waters to groundfish trawl with pelagic and nonpelagic fishing gear, as stated in proposal 11. Where is the science? Again, I ask that the Board listen to those who come to the table with science

based knowledge and take no action on this proposal.

I would respectfully request that the board of fish not advance proposals 11, nor proposals 163-165 nor proposals 170-172 and respectfully suggest that you implore the help and guidance of the appropriate body that lends itself to fisheries regulatory process, supported by science and which we as fishermen and women have come to depend upon.

Thank you for the opportunity to comment

Sincerely

Carmel Carty McCarthy

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PC91

**Submitted by:** James Castle

**Community of Residence:** KETCHIKAN

I am a commercial fisherman from Ketchikan and I oppose proposal 170. I do not agree that proposal 170 will achieve the results intended. Instead, the economic impact to sport, commercial, and charter fisheries would be extensive. Our hatchery programs for King and Coho salmon support our charter fleet and our Chum programs are a vital component of our commercial fishing revenues. A 25% reduction would cause widespread economic harm to every community in Southeast Alaska. Proposal 170 will cause far more harm than benefit.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Richard Catrett, and I am a commercial fisherman based in Juneau, Alaska. I fish aboard the Myrna Rose.

If hatchery production is reduced, I would lose income. I need that income to pay for my boat. Without that income, I would have to get a second job to cover the boat's expenses. If there is not enough income, there is no reason to have the boat, and I would have to sell it or try to sell it. Commercial fishing is not the money maker it used to be.

Commercial fishing also provides an opportunity for my son, who is 15, to work on the boat and learn about earning his own money.

A reduction in harvest opportunity would be a disaster. Between low fish prices and the costs to store, maintain, and operate the boat, reduced harvest opportunity would be devastating. People fish to feed themselves, and people need fish for food.

These proposals are reckless. It is akin to swinging at a baseball with a blindfold on. The impact is on the people fishermen support, not just fishermen themselves. There is an entire ecosystem, from marine biologists to companies that offer services and supplies to run the facilities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,



Richard Catrett  
Juneau, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Annie Causey, and I live in Sitka, Alaska. I am a hatchery worker.

Adopting Proposals 170, 171, and 172 would affect my income stability and job security. These proposals would also reduce harvest opportunity for the commercial fishery. Beyond the immediate effects, they would affect future returns and stock availability. We will not see an immediate impact, but one that will affect my work stability and the local commercial fleets three to five years down the line. Reduced production now would mean rebuilding stocks from smaller returns, with impacts extending nearly a decade into the future.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Annie Causey  
Sitka, Alaska





## Central Council of the Tlingit & Haida Indian Tribes of Alaska

March 2, 2026

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: Central Council of the Tlingit & Haida Indian Tribes of Alaska Written Comments for March 2026 Statewide Alaska Board of Fisheries Meeting

Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries:

Central Council of the Tlingit & Haida Indian Tribes of Alaska (Tlingit & Haida) submits the following comments for your consideration at the March 2026 Statewide Alaska Board of Fisheries Meeting. Tlingit & Haida represents more than 38,000 Tribal Citizens whose cultural, spiritual, nutritional, and economic wellbeing is directly tied to healthy marine ecosystems, access to fisheries resources, and responsible state fishery management. Indigenous stewardship systems promote long-term sustainability through localized monitoring, social enforcement, and cultural transmission of Traditional Ecological Knowledge. Our comments focus on the following proposals:

- Proposal 162 (Oppose) - Prohibiting commercial transport services in subsistence fisheries
- Proposals 163-165 (Support) – Proposals related to state managed trawl fisheries
- Proposals 170-172 (Oppose) - Proposals related to reducing salmon hatchery production
- Proposals 176-177 (Oppose) – Proposals related to the pooling of bag limits in sport fisheries
- Proposals 179-180 (Oppose) – Proposals related to annual limits of king salmon for residents

## Proposal 162

Tlingit & Haida opposes Proposal 162. This proposal seeks to prohibit the use of any commercial transportation services for the purposes of commercially transporting individuals to and from subsistence harvesting locations. Tlingit & Haida opposes this proposal for the following reasons:

1. The proposal does not define “commercial transportation services” and provides no exceptions. As written, it could unintentionally restrict subsistence access in Southeast Alaska. Our region is comprised of island communities connected by coastal waterways, not road systems. Many Tribal Citizens rely on commercial ferry services—such as the Alaska Marine Highway System and the Inter-Island Ferry Authority—as well as commercial floatplanes to reach customary and traditional use areas. In our region, these services are essential access infrastructure, not discretionary conveniences. A blanket restriction on “commercial transportation” would disproportionately impact our Tribal Citizens’ ability to engage in subsistence harvesting.
2. Tlingit & Haida is committed to removing barriers that impede our Tribal Citizens’ ability to engage in subsistence activities. Alaska Native peoples are already among the most heavily regulated populations in the country with respect to harvesting from our traditional lands and waters. In Southeast Alaska, where communities are remote and access to affordable store-bought foods is limited, subsistence harvesting is not supplemental—it is essential to food security, cultural continuity, and community wellbeing. Any proposal that restricts access to the sea or reduces Tribal capacity to support subsistence efforts directly undermines our way of life and the practices our ancestors have sustained for thousands of years.
3. Federal (and state) recognized Tribes must retain the ability to exercise sovereignty by supporting their Tribal Citizens through self-determination. Southeast Alaska is a marine-dependent region with a high cost of living and limited infrastructure. As the costs of vessels, fuel, and equipment continue to rise, it is increasingly difficult for families to independently access marine resources. The combination of these factors puts our coastal communities at a high risk of food insecurity. Tribes play a critical role in filling that gap. For years, tribes in Southeast Alaska have utilized NOAA’s Community Harvest Permit program to strengthen food security and build community capacity. Through these efforts, tribes provide access to Pacific halibut, teach harvesting and processing skills, and help families develop the experience needed to fish independently. While this is a federally managed program, it demonstrates successful collaboration between nations that promotes Tribal Sovereignty to responsibly support their communities. Tribes are not merely “commercial entities,” and any ambiguity in this proposal that could subject Tribal food security programs to enforcement action must be clarified to avoid unintended infringement on Tribal sovereignty and community wellbeing.

## Proposals 163-165

Tlingit & Haida supports Proposals 163-165. These proposals seek to provide our state management system with structured guidance on definitions and data collection methods within state managed trawl fisheries. Tlingit & Haida supports these proposals for the following reasons (see attached supplemental resolutions):

1. Our relatives along Alaska's western coast have experienced severe and inequitable fishery closures with profound impacts on food security and community wellbeing. Federal law requires a subsistence priority, yet management regimes have repeatedly failed to prevent bycatch levels that undermine that mandate. Although trawling is prohibited in Southeast Alaska, trawl activity in adjacent federal waters affects shared marine ecosystems, including salmon and other migratory species central to our subsistence lifeways.
2. Under 5 AAC 39.105, pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for bottom fishing. However, pelagic trawl gear currently make contact with the bottom based on rigging, vessel speed, and benthic topography. Chronic disturbance of benthic habitat reduces structural complexity, which is essential for rockfish, crab, and forage species. In the Gulf of Alaska and adjacent waters, salmon marine survival is linked to forage fish availability, plankton productivity, and climate conditions. Trawl bycatch and ecosystem disturbance can affect trophic dynamics beyond target species. Proposals 163 and 164 would better align Board regulations with state statute and strengthen accountability in how trawl vessels operate in this region. Protecting benthic habitat is essential to sustaining the marine species that depend on these environments.
3. The Alaska Board of Fisheries recently modified its management of Area M to help reduce chum salmon bycatch bound for Western and Interior Alaska. While this is a constructive step toward recovery and sustainability, additional measures are necessary. Reducing trawl bycatch remains critical to protecting Alaska's salmon, the ecosystems that sustain them, and the communities that depend upon them. Those communities are ecologically and culturally linked to statewide salmon sustainability. Salmon are migratory beings that cross management boundaries. Political boundaries do not define ecological relationships. Tribal stewardship perspective requires statewide solidarity in reducing avoidable mortality. Adoption of these proposals would demonstrate a continued commitment to safeguarding both the resource and the people it supports through combined support from Traditional Ecological Knowledge and Western Science.

## Proposals 170-172

Tlingit & Haida opposes Proposals 170-172. These proposals reduce the hatchery production of salmon in the state of Alaska by as low as 0% of its current output statewide. Tlingit & Haida opposes this proposal for the following reasons:



1. Southeast Alaska has operated salmon hatcheries for decades, and these programs are deeply integrated into our regional economy and way of life. Hatchery production supports personal use, commercial, sport, and subsistence fisheries that many families depend upon for both income and food security. Hatchery returns to Terminal Harvest Areas provide harvest opportunity—especially for king salmon—while reducing pressure on wild stocks and Pacific Salmon Treaty allocations. This structure benefits resident sport fishers, commercial power trollers, and local communities alike.
2. For many Alaska families, access to hatchery salmon directly supports household food needs and helps offset the high cost of groceries in our region. Hatcheries also generate employment, sustain working waterfronts, and contribute to the broader economic stability of Southeast Alaska. Given their longstanding role in supporting both resource sustainability and local economies, the full range of hatchery benefits must be carefully considered before any decision is made to significantly reduce or eliminate these operations.
3. Salmon biomass provides critical marine-derived nutrients to freshwater and nearshore ecosystems. Any sudden, large-scale reductions in hatchery releases could disrupt predator-prey relationships while simultaneously impacting local economies that depend on those returns. Abrupt, non-adaptive, system-wide cuts are inconsistent with principles of precautionary and adaptive management. If reductions are biologically warranted, they should be implemented through a phased, adaptive framework supported by ecosystem monitoring and clear performance metrics. Meaningful Tribal consultation is also necessary, including ecosystem impact modeling, socioeconomic analysis, and community engagement. As currently written, these proposals lack the comprehensive planning and policy review necessary to be considered viable management actions.

## Proposals 176-177

Tlingit & Haida opposes Proposals 176 & 177. These proposals seek to allow sport anglers within marine waters that occupy the same vessel to “pool” bag limits of marine species. Tlingit & Haida opposes this proposal for the following reasons:

1. A recurring concern raised during the Board of Fisheries and Board of Game deliberations is ADFG’s and Wildlife Troopers’ limited capacity to enforce complex or ambiguous regulations. These proposals create enforcement scenarios that are unclear and likely unmanageable under current staffing and funding levels. For example, if a charter vessel carries multiple unrelated parties and one group harvests all allowable fish while another harvests none, how would catch attribution be determined? Would fish need to be shared? The proposal provides no clarity.

Additionally, Proposal 177 does not address how annual nonresident limits—such as those for king salmon, rockfish, or lingcod—would be tracked and enforced in these



shared-harvest situations. Without clear guidance, the ADFG and law enforcement would face significant challenges ensuring compliance.

2. Sport fisheries operate within an allocation structure that already places disproportionate conservation burden on subsistence and rural residents during low abundance periods. Increasing efficiency in nonresident fisheries while imposing constraints elsewhere undermines equity principles.

Sportfishing—particularly for nonresidents—is not intended to function as a maximized-efficiency harvest system. The experience is rooted in personal participation, time on the water, and the broader Alaska experience. Allowing others to catch fish on behalf of an individual, or encouraging rapid attainment of vessel limits, shifts sportfishing away from its traditional recreational purpose and toward a more industrialized model inconsistent with its intent.

3. ADFG already faces challenges in collecting and analyzing reliable data due to budget constraints. Significant changes in how harvest occurs would directly affect how logbook and survey data are interpreted. Under current management, when an individual reaches a bag or annual limit, their fishing effort typically ceases. These proposals alter that dynamic and may increase effective fishing pressure. As a result, catch-per-unit-effort data would no longer be comparable to historical datasets, undermining long-term trend analysis and stock assessment modeling.

Maintaining consistent and reliable data is essential to sustainable fisheries management. Tlingit & Haida has serious concerns about introducing regulatory changes that could compromise data integrity and weaken the scientific foundation of future management decisions.

## Proposals 179-180

Tlingit & Haida opposes Proposals 179 & 180. These proposals seek to establish an annual limit to the residents for the harvest of Chinook (king) Salmon Statewide. Tlingit & Haida opposes this proposal for the following reasons.

1. Southeast Chinook (king) fisheries operate under treaty-based allocation frameworks, and statewide uniform limits ignore regional complexity. Tlingit & Haida is in support of improved reporting to improve stock assessment quality, and e-reporting (when viable) can modernize data collection. However, imposing an annual limit on a culturally significant species such as king salmon would disproportionately impact Indigenous peoples. For many Tlingit & Haida families, king salmon is a priority harvest tied to seasonal timing, food security, and cultural practice. In Southeast Alaska, king salmon fisheries are already among the most restricted, with area closures and limited opportunity common despite ongoing catch-and-release fisheries. Additional annual limits would further constrain access without clear evidence that such measures are

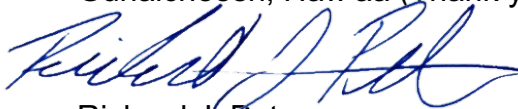
necessary.

2. A statewide annual limit fails to account for regional differences in stock status, management structure, and local knowledge. Tlingit & Haida strongly supports conservation and sustainable management; however, current conditions in Southeast Alaska do not justify additional annual limits on residents, particularly Indigenous harvesters. If conservation measures become biologically necessary, subsistence and customary users should be the last to bear reductions, consistent with longstanding management principles and the importance of these resources to our livelihoods.
3. Under the Southeast Alaska king salmon management framework, sport harvest is managed within a shared allocation. Imposing resident annual limits without broader management changes risks shifting harvest opportunity toward nonresident anglers—both guided and unguided—rather than meaningfully conserving fish. Southeast Alaska residents already face reduced access to local resources. These proposals may unintentionally accelerate growth in the nonresident sport sector at the expense of local communities.

If the proposal is intended to address a localized conflict, it should be resolved at the regional or area level. Statewide measures should not be adopted without clear biological justification and demonstrated need across all affected regions.

Please do not hesitate to reach out to my office with questions. We respectfully request that the Alaska Board of Fisheries evaluate proposals not only through a regulatory lens, but with significant consideration for ecological connectivity, cumulative impacts, regional equity, Indigenous food sovereignty and long-term resilience of Southeast Alaska fisheries and communities.

Gunalchéesh, Háw'aa (Thank you),



Richard J. Peterson  
President





March 1, 2026

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Anchorage, AK 99811

Re: **Oppose** Proposals 11, 163, 164, 165 and 170, 171, 172

Chairwoman Carlson-Van Dort and Board Members

I am writing in opposition to the proposals 11, 163, 164, 165, 170, 171 and 172

I was born in Kodiak, am a lifelong resident and 2nd generation trawl fisherman in the Gulf of Alaska. My family has operated the F/V Topaz in the GOA for more that 45 years. Myself and my crew, along with our families, live in and support the Kodiak community, we deliver our catch to the local processors and tender salmon around the island all summer.

I oppose proposals 11, 163, 164 and 165 The areas affected by these proposals are important fishing grounds for the trawl fleet, and there is no justification to close or further restrict them. Closures would disproportionately affect the smaller boat fleet, as the near shore waters offer protection from the weather. The trawl fleet in the Gulf uses electronic monitoring, cameras recording 100% of our pelagic pollock fishing, including any fishing inside State waters, and use salmon excluders consistently. As local, small boat owners and operators we care about all the fisheries in the Gulf, and are continually working to improve our performance and minimize impact and bycatch.

I also oppose proposals 170, 171 and 172. Strong salmon runs are extremely important to our local fishing fleet, processors and the Gulf communities. The hatchery program has helped supplement these fisheries and support more consistent returns.

Please do not take action on proposals 11, 163, 164, 165, 170, 171 and 172

Thank you

Jason Chandler

F/V Topaz

Kodiak, Alaska



# Chickaloon Village Traditional Council

## (Nay'dini'aa Na' Kayax)

VIA ONLINE COMMENT SUBMISSION to the Alaska Statewide Board of Fish Meeting

March 2, 2026

Chief Gary Harrison,  
*Chairman/Elder*

Rick Harrison,  
*Vice-Chair*

Lorraine "Rain" Wade,  
*Secretary/Elder*

Cheryl Sherman,  
*Treasurer*

Philip Ling,  
*Member*

Emily Peterson,  
*Member*

Doug Wade,  
*Member/Elder*

Re: Comment on Proposals for Statewide Board of Fish Meeting

Ugheli Dzaen (Good Day) Board of Fish Members,

Chickaloon Native Village (CNV) or Nay'dini'aa Na' Kayax is a federally-recognized sovereign Tribal Nation in Alaska (Federal Register, Volume 47, Number 227, November 24, 1982, and reaffirmed in Federal Register, Volume 58, Number 202, October 21, 1993), with the full power and authority to consult and enter into agreements with local, state, and federal governments at their discretion. Chickaloon Village Traditional Council (CVTC) is the governing body of CNV as recognized by CNV Tribal citizens with the full power and authority to act for CNV. CVTC has a responsibility to provide a government for the good health and welfare of its Tribal citizens and address any needs in its community.

CNV's ancestral territory and customary area of use encompasses much of Southcentral Alaska and extends from the Wrangell St. Elias Mountains and Copper River Watershed to the Talkeetna and Chugach Mountains and Cook Inlet. This territory includes countless watersheds, rivers, streams, lakes, and wetlands stewarded by CNV Tribal Citizens for thousands of years. CNV's traditional area of influence overlaps neighboring Dena'ina Dene and Ahtna Dene Tribal Nations. CNV has a responsibility to steward and protect the environment, cultural resources, and the health of Tribal Citizens and community members in perpetuity. Actions that occur within CNV's traditional ancestral territories and customary area of use, including Copper River Watershed, may impact our environment, the cultural resources including fish and wildlife, and the health, safety, and welfare of our Tribal citizens.

Ahtna Peoples, including CNV Tribal citizens, have long managed salmon using traditional practices deeply rooted in cultural and ecological knowledge, ensuring sustainable salmon runs and protecting this vital resource. As a cultural keystone species, salmon are integral to Ahtna ways of life, and their loss would cause profound and irreparable harm. Principles such as fish allocations and escapement goals are embedded in Ahtna cosmology, reflected in oral traditions and spiritual beliefs. By aligning seasonal harvesting with salmon migration patterns and using selective tools like dip nets, fish wheels, and weirs, Ahtna Peoples ensured adequate spawning and population renewal. Before colonization, we successfully maintained large, sustainable salmon runs through these time-tested methods. Embracing these traditional practices today offers a pathway to restoring balance and securing healthy salmon populations for future generations.

### **Proposal 164 - Establish bottom contact monitoring for pelagic trawl gear: CVTC SUPPORTS**

Current regulations prohibit seafloor contact by pelagic trawl gear, but without mandatory sensors there is no mechanism to verify compliance. Requiring seafloor contact detection technology is a common-sense measure to close this enforcement gap and better protect sensitive benthic habitat.

Lisa Wade,  
*Executive Officer*

Cary Fremin,  
*Operations Officer*

**Proposal 165- Require salmon excluders for pelagic trawl gear: CVTC SUPPORTS**

Salmon excluder technology has been used in the federally managed Bering Sea/Aleutian Island and Gulf of Alaska pollock fisheries since 2002. At-sea trials show salmon escapement rates averaging 58%. Requiring excluders in state waters would extend this bycatch mitigation approach to state-managed pelagic trawl operations and reduce the negative effects of the fishery.

**Proposal 180: Establish sport fishing chinook salmon limit of 5 fish, restrict winter harvests: CVTC SUPPORTS**

Chinook salmon are experiencing widespread declines across Alaska with most in-river fisheries already closed by regulation or emergency order. A statewide annual limit of 5 fish would provide a consistent conservation baseline in mixed-stock ocean fisheries.

**Proposal 186: Reduce commercial salmon fishing opportunity with drift gillnet gear in the Central District of the Cook Inlet Area: CVTC SUPPORTS**

Offshore drift gillnet harvest in the central mixed-stock area of Upper Cook Inlet have increased catches of coho relative to the in-shore harvest corridor. Given the recent low coho escapements to Deshka and Little Susitna Rivers, marine harvest of these salmon in mixed-stock marine fisheries should be avoided. Restricting additional fishing time in the central inlet at high Kenai run strengths will reduce interception of northbound, Upper Cook Inlet coho stocks.

**Proposal 172: A moratorium on pink and chum salmon production: CVTC OPPOSES**

CVTC is planning to conduct salmon egg incubation for research and restoration of depleted salmon stocks. A board of fish-imposed moratorium for production of these salmon species may close the door to important and justified fish population rehabilitation efforts. There have been no increases in hatchery pink and chum salmon production in Alaska since 2018 and 2019 (respectively). In this instance, the State regulatory process is working, and an added moratorium may unnecessarily close doors to future research and conservation.

CVTC urges the Board to support Proposals 164, 165, 180, and 186 to strengthen habitat protections, reduce salmon bycatch, and address documented declines in Chinook and coho salmon populations across Southcentral Alaska. We oppose Proposal 172 because it may limit important salmon research and restoration opportunities. CVTC remains committed to working collaboratively with the Board, ADF&G, and neighboring Tribes to ensure that salmon management decisions reflect the best available science, honor traditional ecological knowledge, and protect the salmon resources that are central to the health, culture, and sovereignty of Ahtna peoples.

May Nek'eltaeni (Creator) Guide our Footsteps,

  
Chief Gary Harrison (Mar 2, 2026 15:48:44 HST)

Traditional Chief Gary Harrison  
Chairman



Chitina Dipnetters Association  
 PO Box 35230  
 Ft. Wainwright, AK 99703  
 Chuck Derrick, Pres.  
 cderrick@chitinadipnetters.com

#### Fisheries Board Members:

Below are The Chitina Dipnetters Association comments on proposals 162 & 175 to the BOF Statewide Finfish Meeting.

#### Proposal 162 **Opposed**

This proposal would prohibit commercial transport services in state subsistence fisheries. Many subsistence fishery participants lack the means to access the fishery, this is especially true in the Glennallen Subdistrict on the Copper River where most of the shoreline is privately owned (majority Ahtna native corp. owned) thus making it impossible to legally access the river on foot. A boat is a must and many state subsistence fishery users are more than willing to pay for transportation to a fishing site. This proposal if passed would severely hamper opportunity in state subsistence fisheries.

#### Proposal 175 **Opposed**

This proposal seeks to reduce dipnet mesh size to 3.5" stretch mesh and also prohibit a rope attachment between the dipnet handle and tied to a boat, supposedly to reduce incidental mortality in catch and release of Chinook salmon. No scientific studies or data are presented by the author to justify this claim. If passed, this proposal would for dipnetters statewide, if their net mesh was over 3.5" stretch, require the purchase new netting costing upwards of \$50 for each owned net. This would be a high cost to dipnetters due to a perceived issue.

As far as a rope tied to the dipnet handle and a boat to extend the reach of the dipnet beyond the length of the rigid handle, I am not sure where the author is going with this. The author makes it sound like some boaters are trolling for salmon with dipnets, which is totally absurd.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Jerry Christiansen, and I am a commercial fisherman based in Kodiak, Alaska. I operate Rolling Bay Fisheries LLC and fish aboard the F/V Wendy Anne.

Reducing hatchery production would have a large and direct impact on salmon fishermen's livelihoods. These changes would affect salmon runs, business income, families who rely on salmon for food sustainability, and much more.

These proposals would significantly change the way Kodiak and Alaska have functioned for years. It would create less fish here, less fish being processed, and fewer jobs. It would also mean less salmon for Alaska Native people who have relied on salmon as a main food source for centuries. The ripple effects would be felt across other fisheries and in communities outside Alaska as well.

I am concerned we could face low returns for years to come and impacts to future runs. I am also concerned about the potential loss of our salmon industry, our markets, and the investments we have made to sustain the industry. We do not know why salmon are declining, and these proposals would create serious harm without clear answers.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Jerry Christiansen

Kodiak, Alaska



Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811  
Email: dfg.bof.comments@alaska.gov

March 2, 2026

RE: Opposition to Proposal 11 (submitted by Linda Kozak/FV Trojan)

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

Thank you for the opportunity to comment on Proposal 11 to ban trawling (pelagic and non-pelagic) in all state waters west of 170° W longitude. The signatories on this letter represent Aleutian Islands golden king crab harvesters as well companies who fish for non-pollock groundfish in the Aleutian Islands. Our companies harvest crab and groundfish on behalf of our companies and the Western Alaska Community Development Program that supports over 30,000 western Alaska residents. Together we **strongly oppose** Proposal 11 for the following reasons:

- Inter-sector conflicts are best avoided by coordination on the fishing grounds, not closures. Our fleets have established effective communication on the grounds to minimize gear conflicts.
- Closing State of Alaska waters to groundfish trawl vessels will concentrate fishing in areas and times where more gear conflict, not less, is likely to occur. It will concentrate groundfish trawl fishing into areas where the majority of golden king crab fishing already occurs.
- The Aleutian Islands has extensive habitat closures already in place. Over 95% of all fishing grounds in this area are closed to trawl gear.

**The Proposal Upends Years of Collaboration and Cooperation Between Sectors.** First and foremost, it is important for the Board to understand that over the years our sectors have voluntarily worked together to understand when, where, and how each of these two fisheries is executed.<sup>1</sup> Admittedly, this inter-sector collaboration has not always been easy and challenges have been encountered, but fishery participants from both sectors are committed to continuing these efforts.

Most recently we met in May 2025, ahead of the start of the golden king crab season. At this meeting we discussed the storage of golden king crab gear using maps to identify those areas/depths utilized by the golden king crab fleet so that the stored gear would not conflict with fishing locations/depths used by groundfish vessels. We also discussed active fishing by both sectors and the critical need for participants to communicate with each other. To this end,

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<sup>1</sup> Despite repeated requests from other participants, the FV Trojan has consistently chosen not to participate in any of these conversations.

participating golden king crab vessels send groundfish captains their intended fishing locations before leaving Dutch Harbor so that trawl vessels know where the golden king crab fleet plans on fishing and can work together to ensure fishing plans aren't disrupted. In turn, groundfish vessels send their fishing information to participating golden king crab captains prior to reaching the grounds and whenever moving locations. Both sectors recognize the importance of this two-way communication for avoiding gear conflicts and cooperatively operate to the greatest extent possible.

It is critical and significantly more impactful to have these two groups continue to voluntarily work together for the benefit of both crab and groundfish resources and their associated fisheries. These joint meetings and the conversations that follow are based on respect and the mutually recognized need to understand each other's fisheries. Recognizing that golden king crab fishing occurs beyond 3 nm, Proposal 11 would create new waterways conflicts as vessels shift effort to remaining open areas.

**The Proposal Overrides Previous Comprehensive Regulatory Action to Protect Aleutian Islands Habitat.** Over 95% of State of Alaska and federal waters within the Aleutian Islands has already been closed to trawl fishing by the North Pacific Fishery Management Council for the purposes of protecting benthic habitat and populations of Steller sea lions. In these "freeze the trawl footprint" actions, the limited areas remaining open were purposely selected through a transparent public process using extensive analyses and stakeholder input and were based on data that showed high groundfish catch/low bycatch and habitat resiliency to trawl impacts. These previous actions severely limited fishing grounds open to trawl vessels. Since 2019, an average of 3-7 vessels operate in this area. In 2025 only five vessels operated in Aleutian Island State waters. There has not been an increase in trawl activity within golden king crab habitat.

**The Anticipated Results of Additional Closures Are Highly Speculative.** ADF&G staff comments note that the degree to which prohibiting trawl gear inside state waters would benefit golden king crab stock health or habitat is "difficult to assess and largely unknown". What is known is that targeting Pacific ocean perch (POP) in these limited open areas results in minimal bycatch of crab and provides very high catch per unit effort (CPUE) of target fish. As is also highlighted in the ADF&G staff comments, golden king crab bycatch is incredibly low. On average less than 1% of golden king crab bycatch (66 golden king crab per year) were taken inside state waters between 2020 and 2025. Notably, prohibiting trawling in these waters would further concentrate groundfish fishing into areas where 99% of golden king crab bycatch occurs. Having the ability (opportunity) to fish in the highest CPUE and lowest bycatch areas means that POP quotas are harvested with fewer tows (less time on the water), which in turn reduces potential crab bycatch and habitat impacts. Less time on the water also means less time for potential gear conflicts.

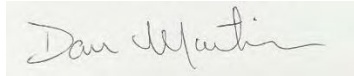
**Conclusion.** The information available does not demonstrate that Proposal 11 would benefit the golden king crab stock, habitat, or fishery. However, adoption of this proposal would significantly impair the current and continued collaboration between these two fishing sectors and should be given appropriate consideration. Adopting this proposal will most likely increase



gear conflicts in the remaining fishing grounds, not decrease them. Managers should be encouraging and creating environments that foster communication and cooperation amongst differing sectors and not adopting rigid regulations that negatively impact one sector with no quantifiable benefit for another sector.

Thank you for your time and consideration.

Sincerely,



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Dan Martin  
FV Patricia Lee & FV Aleutian No. 1

*Ruth Christiansen*

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Ruth Christiansen  
Ocean Peace, Inc.

*Glenn Merrill*

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Glenn Merrill  
Glacier Fish Company



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Dave Wood  
U.S. Seafoods

*Mary Beth Tooley*

---

Mary Beth Tooley  
O'Hara Corporation



March 2nd, 2026

Alaska Board of Fisheries  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

**Subject: Opposition to Board of Fisheries Proposal 170**

Dear Board Members:

Chugach Alaska Corporation (Chugach) is the Alaska Native Regional Corporation for the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C. § 1601, et seq. (“ANCSA”). The Chugach Region includes Prince William Sound, where many of our communities rely on fishing as a central part of life. Commercial, sport, and subsistence harvests remain essential to local economies, cultural practices, and food security for our shareholders and their families.

Proposal 170 would place a broad statewide limit on hatchery operations without taking into account the unique needs or performance of each region. It requires all hatcheries to reduce their pink and chum salmon egg collections by 25%, even though this reduction is not based on any region-specific review or demonstrated impacts on wild stocks. A cut of this size would lead to fewer juvenile releases and smaller adult returns, which would directly reduce fishing opportunities in Southeast Alaska, Prince William Sound, Kodiak, and Cook Inlet. For the Chugach Region, where so many of our community members depend on consistent and sustainable salmon harvests, these impacts would be felt immediately and deeply. It would also decrease the revenue that supports hatchery programs and the fisheries, workers, and coastal communities that rely on them. Establishing a rule without clear justification or a process to evaluate its outcomes sets out an uncertain precedent for future management decisions.

Please accept this letter as Chugach Alaska Corporation’s opposition for Proposal 170.

Sincerely,

Jack Blackwell

Vice President, Lands and Resources

Chugach Alaska Corporation



March 2nd, 2026

Alaska Board of Fisheries  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

**Subject: Opposition to Board of Fisheries Proposal 171**

Dear Board Members:

Chugach Alaska Corporation (Chugach) is the Alaska Native Regional Corporation for the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C. § 1601, et seq. (“ANCSA”). The Chugach Region includes Prince William Sound, where many of our communities rely on fishing as a central part of life. Commercial, sport, and subsistence harvests remain essential to local economies, cultural practices, and food security for our shareholders and their families.

Proposal 171 would require changes to Prince William Sound pink salmon hatchery permits based on stray thresholds that have not yet been determined, even though current data show that stray rates in Lower Cook Inlet remain collectively low. No negative impacts from straying have been found in Lower Cook Inlet pink salmon stocks, and existing permit conditions already include monitoring and management requirements. The proposal would reduce production without considering whether other tools such as adjusted release strategies, operational changes, or fisheries management measures could accomplish the same goals. In addition, the proposal limits the Alaska Department of Fish and Game’s ability to manage straying through existing permit conditions and administrative oversight. Taken together, these changes could lead to unnecessary production cuts and new regulatory uncertainties for hatchery programs and the communities that depend on them.

Please accept this letter as Chugach Alaska Corporation’s opposition for Proposal 171.

Sincerely,

Jack Blackwell

Vice President, Lands and Resources

Chugach Alaska Corporation



March 2nd, 2026

Alaska Board of Fisheries  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

**Subject: Opposition to Board of Fisheries Proposal 172**

Dear Board Members:

Chugach Alaska Corporation (Chugach) is the Alaska Native Regional Corporation for the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C. § 1601, et seq. (“ANCSA”). The Chugach Region includes Prince William Sound, where many of our communities rely on fishing as a central part of life. Commercial, sport, and subsistence harvests remain essential to local economies, cultural practices, and food security for our shareholders and their families.

Proposal 172 would halt any future increases in pink and chum salmon egg take across the state by locking production at 2025 levels, with no clear path for adjustments as conditions change. This would prevent regions from adapting their programs to shifting needs, biological performance, or conservation considerations. The proposal would also sideline the Regional Planning Team process, which currently provides an open and science-based way to evaluate hatchery proposals and gather regional input. In doing so, it removes the Commissioner’s ability to make informed, case specific decisions based on biological review. These changes introduce long term uncertainty for hatchery programs, coastal communities, and processors, and they move Alaska away from the adaptive management system that has long guided responsible hatchery operations. As written, the proposal could leave regions unable to respond effectively to future challenges or opportunities.

Please accept this letter as Chugach Alaska Corporation’s opposition for Proposal 172.

Sincerely,

Jack Blackwell

Vice President, Lands and Resources

Chugach Alaska Corporation



February 25, 2026

Board of Fisheries  
 Art Nelson  
 Executive Director  
 PO Box 115526  
 Juneau, AK 99811-5526

The Chugach Regional Resources Commission (CRRC) comments on Statewide Finfish and Supplemental Issues proposals.

### **Proposal 162 – Commercial Transport in Subsistence Fisheries**

#### **CRRC Position: Support**

CRRC **supports** proposal 162 written by Ahtna Intertribal Resource Commission on the prohibition of commercial transport of subsistence users in the state subsistence fishery. This proposal would clarify the definition of “subsistence uses” as including no commercial transportation, which further protects subsistence fisheries from commercial guiding under the guise of commercial transportation. Many subsistence users who are helping to feed families are now finding it hard to catch enough salmon for their own families, let alone share with elders and others who cannot get out to fish. Protecting the definition of “subsistence uses” will protect the people who subsist off the lands and waters to continue a traditional way of life.

### **Proposal 163 – Redefinition of Pelagic Trawl Gear**

#### **CRRC Position: Support**

CRRC **supports** redefining pelagic trawl gear in state waters to ensure it reflects actual gear performance. Testimony and analyses before the North Pacific Fishery Management Council have acknowledged that pelagic trawls can make bottom contact. If gear cannot demonstrably avoid the seafloor, it should be regulated as bottom-contact gear. Clear classification standards are necessary to protect benthic habitat and ensure accountability.

### **Proposal 164 – Bottom Contact Monitoring**

#### **CRRC Position: Support**

CRRC **supports** mandatory seafloor contact monitoring for pelagic trawl gear in state waters. Without enforceable monitoring, the prohibition on bottom contact lacks meaning. Real-time or verifiable monitoring is a reasonable and necessary safeguard to protect crab habitat, forage species, and the broader marine ecosystem that supports subsistence and commercial fisheries.



## Proposal 165 – Salmon Excluder Requirement

### CRRC Position: Support

CRRC **supports** requiring salmon excluders in all pelagic trawl gear operating in state waters. Given recent Gulf of Alaska closures after reaching Chinook salmon Prohibited Species Catch limits, stronger preventative measures are warranted. Excluders must be paired with conservative, abundance-based bycatch limits and automatic closures to ensure salmon, particularly declining Chinook stocks, are protected.

## Proposal 170 – Statewide Hatchery Egg Take Reduction

### CRRC Position: Oppose

CRRC **opposes** a mandated statewide egg take reduction. This is an oversimplified approach to address the potential impacts of hatchery introgression. Ongoing research aims to understand the implications of hatchery pink and chum salmon interactions with wild stocks and should be utilized to inform the Regional Planning Team when deciding stock-specific hatchery egg take permitting. With a statewide egg take reduction, the likely effects are statewide reduction of hatchery pink and chum salmon, resulting in major food security concerns for subsistence users and economic concerns for commercial users.

## Proposal 171 – Prince William Sound Pink Salmon Egg Take Reduction

### CRRC Position: Oppose

CRRC **opposes** a required reduction for Prince William Sound pink salmon egg takes due to straying concerns that are currently data-limited. Continued research is already underway to evaluate stray rates and genetic impacts, which should inform region-specific egg take permitting decisions.

## Proposal 172 – Moratorium on Pink and Chum Hatchery Production

### CRRC Position: Oppose

CRRC **opposes** a blanket moratorium on hatchery egg take. The Regional Planning Team process provides transparent, case-by-case review of production levels and allows adaptive management. A statewide moratorium would remove flexibility, create uncertainty, and bypass the established science-based management framework led by the Alaska Department of Fish and Game.



## Proposal 187 – Tsiu and Kaliakh Rivers Closure

### CRRC Position: Oppose

CRRC **opposes** closure of a remote area to one user group based on an allocative concern that is not supported by data. The Yakutat community has expressed strong opposition, and this proposal represents a one-sided remedy to what is largely a natural geomorphic event. The Tsiu River system is a high-energy surf zone with shifting sandbars and dynamic outflows. These changes are expected in such systems, and fisheries management must adapt accordingly. It is not consistent with a shared conservation burden to require one user group to forfeit an opportunity because river channels have realigned.

There is no evidence that Tsiu-origin fish will be disproportionately exploited due to the confluence shift. In fact, mixed-stock composition may reduce relative exploitation rates. Importantly, the existing management framework already provides the Alaska Department of Fish and Game with authority to take precautionary action if needed. A permanent regulatory closure is unnecessary and overreaching. Adaptive, in-season management, not allocation-driven restriction, is the appropriate response.

We are thankful for this opportunity to comment on these proposals.

Thank you,

Willow Hetrick-Price  
 Executive Director  
 Chugach Regional Resources Commission

**Submitted by:** Cecilia Ryman  
City and Borough of Yakutat  
**Community of Residence:** YAKUTAT

A resolution opposing proposal 187 is attached. This was passed in a unanimous vote by the CBY Assembly on Jan 2.

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CITY AND BOROUGH OF YAKUTAT  
RESOLUTION 26-01

**A RESOLUTION OF THE CITY AND BOROUGH OF YAKUTAT, ALASKA OPPOSING THE STATE OF ALASKA FISHERIES ADVISORY COMMITTEE PROPOSAL 187 AND DISCURAGING THE STATE OF ALASKA FROM CONSIDERING THE CLOSURE OF THE TSIU AND KALIAKH RIVERS OR ANY YAKUTAT AREA RIVER FROM COMMERCIAL FISHING.**

**WHEREAS,** The Yakutat Borough Assembly and Administration is aware of Proposal 187, Proposed by Dan Ernhart, calling for the State of Alaska Administrative Code change in Title 5 to Close the Tsiu River and all waters within one quarter mile of the Tsiu River and Kaliahk River confluence to commercial fishing for salmon; and

**WHEREAS,** Proposal 187 cites a 2025 storm surge that changed the topography of the Tsiu and Kaliahk Rivers and how this change will allegedly affect the salmon run and the sport fishery in the area; and

**WHEREAS,** Proposal 187 offers no scientific opinion or explanation of the development of the proposal, and

**WHEREAS,** The City and Borough of Yakutat definitively opposes the restriction of commercial fishing activity on any river within the Yakutat Borough boundaries; now

**THEREFORE BE IT RESOLVED,** That the Yakutat Borough Assembly offers this resolution as testimony against the actions recommended by Dan Ernhart in Proposal 187; and

**BE IT FURTHER RESOLVED,** That the Yakutat Borough Assembly opposes any commercial gillnet salmon fishing closure within the boundaries of the borough without proper and unrefuted scientific recommendation, and due diligence that includes the informative invitation to the people of Yakutat to comment on such action.

**PASSES AND APPROVED THIS** 2<sup>nd</sup> **DAY OF** January, 2026.

C. Bremner  
**MAYOR CINDY BREMNER**

**ATTEST:**  
Ricardo Tejeda  
**CLERK RICARDO TEJEDA**



SPONSORED BY TINA RYMAN, CBY MANAGER

# CITY OF CORDOVA



March 2, 2026

Marit Carlson-VanDort, Chair  
 Alaska Board of Fisheries  
 % Alaska Department of Fish & Game  
 P.O. Box 115526  
 Juneau, AK 99811-5526

Dear Chair VanDort and Board of Fisheries Members,

On behalf of the City of Cordova and its residents, I write to express strong support for Alaska's private nonprofit salmon hatchery program and formal opposition to Proposals 170, 171, and 172 scheduled for consideration at the upcoming Statewide Finfish Meeting. Cordova is a fishing community in the truest sense — I often point out to visitors that every commercial fishing boat in our harbor is a family-owned business. As you know, the first hatcheries in the state were established in Prince William Sound, and they are a critical element of our PWS economy. Any modification to hatchery management should be made with the most careful scientific evaluation.

## **What Is at Stake for Cordova**

Prince William Sound hatcheries are the backbone of Cordova's commercial fishing industry. PWS hatcheries account for 53% of the total ex-vessel value of salmon harvested in the region, generating \$51 million in average annual harvest value and supporting thousands of fishermen, processing workers, and support sector jobs. For a community of Cordova's size, these are not abstract statistics — they represent families, businesses, and a way of life.

Statewide, Alaska's PNP hatcheries support over 4,200 annualized jobs, \$219 million in annual labor income, and \$576 million in total economic output. They underpin commercial, sport, subsistence, and personal use fisheries from Southeast Alaska to Kodiak. Any significant reduction in hatchery production will be felt immediately and directly by the people of Cordova.

## **Proposal 170's 25% reduction is arbitrary.**

A statewide 25% egg take reduction applied uniformly across every permitted hatchery — regardless of region, species, or performance — has no scientific basis. Such a decision calls for careful scientific analysis, and I note that Department of Fish & Game staff opposed a similar proposal in 2023, commenting:

Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be

clear evidence the amendment will have a positive impact on wild salmon stocks (ADF&G, Staff Comments, Lower Cook Inlet Finfish Board of Fish Meeting, 2023).

The drastic change in hatchery production proposed by Proposal 170 would adversely affect *all* the fisheries of Prince William Sound: subsistence, sport, seine, drift gillnet and personal use. The proposal identifies no specific stocks that would benefit, sets no measurable standard for success, and provides no pathway for reversal.

### **Proposal 172's moratorium undermines established public process.**

Alaska already has one of the strongest hatchery oversight systems in the world, with detailed permits, monitoring, genetics review, and regular reporting through the Alaska Department of Fish and Game. This system evaluates performance regionally, adapts based on science, and protects wild stocks while supporting fishing opportunities. The Board of Fisheries plays an important role, including amending specific permit terms like egg take. But Proposals 170, 171, and 172 don't target individual permits or regional performance. Instead, they impose statewide constraints that bypass the science-based permitting process and commissioner oversight, replacing structured review with blanket mandates. Public process matters. Alaska's fisheries system depends on transparent decision-making and meaningful opportunity for fishermen and communities to weigh in. A moratorium with no defined end date and repeal conditions tied to resolution of "uncertainty in the science" — a standard that may never be met — is not adaptive management. Rather, it removes the flexibility that Alaska's system depends on, eliminates the Regional Planning Team's role in evaluating production, and creates lasting regulatory uncertainty for hatchery operators, processors, and coastal communities.

### **Our Request**

The City of Cordova respectfully urges the Board of Fisheries to reject Proposals 170, 171, and 172. Alaska's science-based, adaptive management system — supported by ongoing research including the Alaska Hatchery Research Project — is the appropriate mechanism for addressing questions about hatchery and wild salmon interactions. Preemptive, blanket restrictions imposed in the absence of demonstrated necessity would cause real harm to real communities before a single conservation benefit has been established.

Cordova has always fished responsibly and supported sound fisheries management. We ask the Board to uphold that same standard: let the science guide the decisions and let the existing management system do the work it was built to do.

Sincerely,

Kristin T. Smith

Mayor of Cordova, Alaska

**CITY OF CORDOVA, ALASKA  
RESOLUTION 02-26-09**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF CORDOVA, ALASKA, OPPOSING  
COMMERCIAL FISHERIES PROPOSALS 170, 171, AND 172, AND SUPPLEMENTAL  
PROPOSAL 187 TO BE HEARD AT THE ALASKA BOARD OF FISHERIES STATEWIDE  
FINFISH AND SUPPLEMENTAL ISSUES MEETING MARCH 17-20, 2026**

**WHEREAS**, the City of Cordova and surrounding Prince William Sound communities rely heavily on commercial fishing and salmon-related industries to support local employment, food security, harbor revenues, municipal services, and long-term economic stability; and

**WHEREAS**, Prince William Sound hatchery programs are foundational regional infrastructure that support commercial fisheries, sport and subsistence opportunity, salmon research and recovery, and the continued viability of Cordova's working waterfront; and

**WHEREAS**, hatchery-supported salmon production underpins local processing capacity, tender fleets, seasonal and year-round jobs, and private investment across Prince William Sound, with economic impacts extending throughout the region's communities; and

**WHEREAS**, Alaska's hatchery system operates under a rigorous, science-based permitting framework administered by the Alaska Department of Fish and Game, providing monitoring, genetics review, reporting requirements, and adaptive management to protect wild stocks while sustaining fishing opportunity; and

**WHEREAS**, Statewide Proposals 170, 171, and 172 would impose broad, non-targeted hatchery production reductions that are not tied to region-specific biological performance or adaptive management processes, and would significantly weaken hatchery-supported research, recovery programs, and fishing opportunity in Prince William Sound without demonstrated conservation benefit; and

**WHEREAS**, abrupt statewide hatchery cuts would create immediate economic harm to Cordova and neighboring communities by destabilizing processors, tender fleets, harbor activity, municipal revenues, and local employment, while increasing uncertainty for fishermen and businesses already navigating climate impacts and rising operational costs; and

**WHEREAS**, Proposal 187 would close a longstanding commercial fishery in the Tsiu River area despite recent seasons demonstrating strong escapement and successful harvest, effectively reallocating the resource away from community-based fishermen from Cordova and Yakutat without a demonstrated conservation need; and

**WHEREAS**, eliminating this commercial fishery would increase the risk of over-escapement, remove an effective management tool, and introduce unnecessary conflict among user groups while reducing economic opportunity for regional fishing communities; and

**WHEREAS**, Alaska’s fisheries management system is strongest when decisions are grounded in regional science, local stewardship, and transparent public process rather than broad statewide mandates that fail to reflect place-based conditions.

**NOW, THEREFORE, BE IT RESOLVED** that the Council of the City of Cordova, Alaska respectfully urges the Alaska Board of Fisheries to:

- 1) Take **no action** on Proposals 170, 171, and 172; and
- 2) Take **no action** on Proposal 187.

**BE IT FURTHER RESOLVED** that the City Council affirms its support for science-based, regionally informed fisheries management that protects Prince William Sound communities, sustains Cordova’s working waterfront, maintains fishing opportunity across user groups, and preserves Alaska’s hatchery system as critical infrastructure for salmon research, recovery, and long-term resilience.

**PASSED AND APPROVED THIS 18<sup>th</sup> DAY OF FEBRUARY 2026**



*Kristin Smith*  
\_\_\_\_\_  
Kristin Smith, Mayor

ATTEST: *Susan Bourgeois*  
\_\_\_\_\_  
Susan Bourgeois, CMC, City Clerk



February 17, 2026

Alaska Dept. of Fish and Game  
 Alaska Board of Fisheries  
 Boards Support Section  
 P.O. Box 115526  
 Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: BOF Statewide Proposals 170-172

Dear members of the Alaska Board of Fisheries,

I am writing you today to express our continued support for Alaska's salmon hatcheries and in opposition of enhancement proposals 170-172 which will be deliberated at the upcoming 2026 Statewide Finfish Board of Fisheries meeting.

The City of Valdez benefits greatly from our regional fisheries enhancement programs. Efforts by all Prince William Sound hatcheries greatly increases sport, commercial, and subsistence harvest opportunities in times of low abundance and provides for direct economic and social benefit to the community of Valdez. This substantial economic benefit is realized through the creation of local seafood and recreational tourism jobs, fisheries business tax, increased commerce through the Port of Valdez, and seafood industry investment in our community.

The City of Valdez recently commissioned a publication to determine key economic and social factors for Valdez. In the evaluation of our seafood sector, it is shown that in 2025 the local seafood industry processed an estimated 25 million pounds of seafood, and created 207 annualized jobs, which increased to 650 jobs during peak summer production.<sup>1</sup> A significant portion of the \$13M in employment related earnings from this industry is spent locally. Commercial fishing and frozen salmon production by our processors contribute substantially to the viability of our Port and Harbor facilities. A key metric worth noting is that **97% of all seafood landings to Valdez were Pink Salmon.**<sup>2</sup> Of which, 86% came from the Valdez Fisheries Development Association (VFDA) and the Prince William Sound Aquaculture Corporation (PWSAC) in 2025.<sup>3</sup>

Hatchery production of Coho salmon by VFDA is the centerpiece of the Valdez summer economy. Each year, thousands of people come from around Alaska to harvest Silver salmon from the waters and shorelines of Port Valdez and to participate in the Valdez Silver Salmon Derbies. Between 2012 and 2017, the sport fishery in Valdez harvested an estimated 40,000 VFDA pink and coho salmon annually.<sup>4</sup> This salmon further benefits local commerce through the sale of sporting goods, boat rentals, custom processing

<sup>1</sup> Valdez Alaska by the Numbers 2025 – Rain Coast Data

<sup>2</sup> Valdez Alaska by the Numbers 2025 – Rain Coast Data

<sup>3</sup> 2025 Prince William Sound Salmon Season Summary – ADFG

<sup>4</sup> Economic Impact of the Valdez Fisheries Development Association, Inc. McDowell Group – 2018





lodging and RV camping, fuel, harbor moorage, fishing charters, and other purchases estimated to be \$9 million annually.<sup>5</sup>

The City of Valdez strongly supports Prince William Sound hatcheries as stated in the communities Economic Strategic Action Plan 2030:

*“Priority #2 – Salmon Hatchery Support*

*Continue to recognize the economic importance of the Valdez Fisheries Development Association (VFDA) and other Prince William Sound (PWS) nonprofit salmon hatcheries to the Valdez commercial fishing industry. VFDA salmon accounts for about one-quarter of the value of all seafood processed in PWS. Support hatchery activities to benefit subsistence, personal use, sport, charter, and commercial fishermen; seafood processors; and state and local governments. Communicate that hatcheries are operated by nonprofit associations that rely on the best scientific methods, precautionary principles, and sustainable fisheries policies to protect wild salmon populations.”*

The Valdez City Council has submitted numerous resolutions affirming its support for our hatcheries. Most recently, it submitted Resolution #24-45 (attached) as PC131 at the PWS meeting in 2024. We strongly encourage the Alaska Board of Fisheries to **reject** all proposals that seek to diminish these great public private partnerships by reducing hatchery production. Such actions will no doubt hinder our coastal economies and reduce opportunities for Alaskans to harvest these renewable salmon resources.

Alaska's salmon hatchery programs are permitted using strong scientific methodology and are built upon sound and sustainable fisheries policies intended to protect wild salmon populations. Our hatchery programs have a long history of successful and responsible fisheries enhancement.

We thank you for the opportunity to submit these comments and look forward to your continued support of Alaska's Salmon Hatchery Programs.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Fleming".

Dennis Fleming  
Mayor  
City of Valdez

<sup>5</sup> Economic Impact of the Valdez Fisheries Development Association, Inc. McDowell Group – 2018

## CITY OF VALDEZ, ALASKA

## RESOLUTION #24-45

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA,  
SUPPORTING THE ALASKA SALMON HATCHERY PROGRAM

WHEREAS, the City of Valdez benefits greatly from the Alaska Private Non Profit Salmon Hatchery Program; and

WHEREAS, Alaska's salmon hatchery program has operated for 50 years and supplements wild salmon harvests throughout the state; and

WHEREAS, Alaska's salmon hatchery program is a model of sustainable economic development that directly benefits subsistence fishermen, personal use fishermen, sport fishermen, charter fishermen, commercial fishermen, seafood processors, as well as state and local governments such as Valdez; and

WHEREAS, Alaska hatcheries accounted for 76% of the total common property commercial catch and 64% of the total ex-vessel value totaling \$46 million in the Prince William Sound region in 2023; and

WHEREAS, the Prince William Sound Aquaculture Corporation (PWSAC) headquartered in Cordova and the Valdez Fisheries Development Association, Inc. (VFDA) headquartered in Valdez contribute significantly to the economies of Prince William Sound communities by providing jobs and an estimated \$200 million in combined economic output annually; and

WHEREAS, reducing hatchery produced Pink and Chum Salmon by 25% will significantly impact fisheries tax revenues Valdez receives and greatly reduce wharfage and dockage fees generated due to the loss of an estimated 4 million pounds of salmon products crossing the Port of Valdez shipping terminals annually; and

WHEREAS, cost recovery revenues from the sale of hatchery produced Pink salmon significantly fund VFDA's Coho salmon sport fish enhancement program, which is the cornerstone of the Valdez summer economy, providing salmon for many sport fish related businesses and the Valdez Fish Derbies; and

WHEREAS, Alaska's salmon hatchery program has proven to be significant and vital to Alaska's seafood and sportfish industries and the State of Alaska by creating employment and economic opportunities throughout the state and in particular coastal communities such as Valdez; and

WHEREAS, Alaska's salmon hatchery program is non-profit and self-funded through cost recovery and enhancement taxes on the resource and is a model partnership between private and public entities; and

WHEREAS, the State of Alaska has significantly invested in Alaska's salmon hatchery programs and associated research to provide for stable salmon harvests and to bolster the economies of coastal communities like Valdez, while maintaining a wild stock escapement priority; an



City of Valdez, Alaska  
Resolution #24-45  
Page 1

WHEREAS, Alaska's salmon fisheries continue to be certified as sustainable by two separate programs, Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC); and

WHEREAS, salmon hatchery programs are permitted and overseen using a transparent public process, employ strong scientific methodology, and are built upon sound and sustainable fisheries policies intended to protect wild salmon populations.

NOW, THEREFORE, BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, that

Section 1. The City of Valdez affirms its support for Alaska's Salmon Hatchery Programs, including PWSAC and VFDA.

Section 2. The City of Valdez supports unbiased and scientific methods to assess the interaction of Alaska's salmon hatchery programs with natural stocks, such as the Alaska Hatchery/Wild Salmon Interaction Study which began in 2011 and the Salmon Ocean Ecology Program.

Section 3 The City of Valdez calls on the Alaska Board of Fisheries to reject proposals to reduce hatchery production, including Proposal 78, and work with the hatchery community, the Alaska Dept. of Fish and Game and industry leaders to further its understanding of the importance of the Alaska salmon hatchery program to all Alaskans and the scientific study surrounding hatchery wild salmon interactions.

PASSED AND APPROVED BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, this 6<sup>th</sup> day of November 2024.

CITY OF VALDEZ, ALASKA

  
Dennis Fleming, Mayor

ATTEST:

  
Sheri L. Pierce, MMC, City Clerk



**Submitted by:** Russell Clark

**Community of Residence:** Kenai

Proposal 175

I am opposed to proposal 175. This proposal affects numerous user groups across the state and also merchants across the state that have dipnets in inventory of 4.5 inch mesh. 3.5 inch mesh is not currently used in manufacturing dipnets so all inventoried and ordered dipnets will be expensed out to business owners at a loss.

In Cook Inlet there have been no incidence of King bycatch in the setnet fishery and very limited if any in the subsistence fishery since king retention has been restricted. This is an out of cycle proposal that affects Cook Inlet setnet fishermen and tens of thousands of Kenai and Kasilof subsistence fishermen that will have to change gear on an undocumented and unproved premise. Also by reducing mesh size to 3.5 inch mesh, in river bycatch of trout and other fresh water species will be increased. I strongly encourage the Board to reject Proposal 175.

**Submitted by:** Charles Clement

**Community of Residence:** Metlakatla

Proposal 170,172,173

To who it may concern

I have been a Tree Point Gillnetter — area 1 b — southeast Alaska for almost 60 years. I have seen the ups and downs over the the years. Hatcheries have helped stabilize the fishery in my area, where we consistently have an opportunity to make a reasonable living. All fisherman in my area contribute 3% of gross to help run these hatcheries. Communities are supported by the fisherman who access these fish. I believe continued hatchery operations are vital for all who participate in the salmon fisheries in Alaska.

Therefore I oppose proposals 170,171,172

Charles Clement

F/V Four Ceasons

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March 2, 2026

Dear Members of the Board of Fisheries:

My name is Jared Cockrum. I have been a commercial salmon purse seine crewmember and captain in Southeast Alaska for nearly 30 years and fish aboard the FV Viking Maid.

Hatcheries in Southeast Alaska have benefited my family for years. They supplement wild stocks in low return years and in some seasons have accounted for nearly half of our harvest. Without hatcheries, some years we would not have survived financially.

Hatchery reductions would negatively affect multiple fishing sectors including trollers, sport fishermen, and charter operators who rely on enhanced kings, cohos, and chums. Reduced production could also threaten processing plants if wild stocks alone cannot support operations.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Jared Cockrum  
Alaska

[REDACTED]

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Russell Cockrum, and I am a boat owner and Southeast Alaska salmon seiner based in Ketchikan, Alaska. I operate the F/V Viking Maid.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If adopted, these proposals could reduce my annual salmon income by 25 percent, which is already in steady decline. With the industry already struggling, this would affect everyone involved — food, fuel, supplies, processing, and more.

I believe decades of factory trawlers have to be doing the most harm. Let us quit going after the wrong target and address the real problem.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Russell Cockrum  
Ketchikan, Alaska

**Submitted by:** Ben Cohen

**Community of Residence:** Wasilla

Bottom Trawling has had an immense impact on Alaskan fisheries. As we face a time when many of our Chinook and Coho stocks are at historic lows it is time to take action. Furthermore, our Halibut stocks across the the Gulf of Alaska are shells of what they once were and they are the biggest casualties of the trawl industry. Moreover, it is unfair that the trawl industry gets to continue pillaging our Alaskan waters while fishermen with far less destructive methods are being restricted at historic levels. This includes sport anglers both salt and freshwater as well as commercial salmon fisherman, halibut long liners and the crabbing industry. It is time we take significant steps to put a ban on the destructive bottom trawling method of commercial fishing and invest in more sustainable fishing methods to help ensure our marine stocks are bountiful and healthy for future generations.

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To: Alaska Board of Fisheries  
From: Cory Cole  
Date: February 26, 2026  
Subject: Proposal 11

My name is Cory Cole. I've been a commercial fisherman in Alaska since 1993 and I strongly support Proposal 11.

For more than 30 years, I've worked the waters of the Aleutian Islands. I've seen good years and bad years. I understand natural cycles. But what I've watched over the last 12 years with golden king crab is not just fluctuation.

When you've fished the same grounds for decades, you know when something has changed after factory trawlers have been in the area.

Proposal 11 would close state waters west of 170° West to trawl gear. This is a reasonable and necessary step to protect golden king crab habitat in the Aleutian Island waters.

We are seeing increased trawl activity overlapping traditional crab grounds — including areas that hold females and sublegal crab. Gear conflicts are increasing. Crab pots are being lost. Fishermen are being pushed off grounds that have supported this fishery for years.

The factory trawl vessels operating in these areas are large industrial operations — some nearly 300 feet long. More than 99% of their historical catch occurs in federal waters. Closing this relatively small portion of state waters will not eliminate their fishery.

But it could protect critical habitat for golden king crab.

The Aleutian bottom is structured — corals, boulders, sponges, complex habitat that supports crab and the species they depend on. While there is limited research to prove conclusively that repeated heavy trawl gear dragging across this habitat causes harm, there is no official research to prove otherwise. The Aleutian Island waters are so remote and large, that research would be extremely expensive and with limited funds available, those efforts have concentrated in the Bering Sea.

Board of Fisheries  
Proposal 11  
Page Two

As a career fisherman, I am also concerned about the future. My son is a fisherman and he wants to build a future in the golden king crab fishery. I want him and his generation, as well as future generations to have the same opportunity I've had since 1993.

That only happens if we protect the habitat now.

This is not about attacking another fleet. It is about drawing a clear boundary inside state waters and saying that critical crab habitat matters.

I urge the Board to adopt Proposal 11.

Thank you

Cory Cole

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Chance Coleman, and I am a commercial fisherman, subsistence user, sport fisherman, and community member in Sitka, Alaska. I operate the F/V Second Chance, F/V Rip Curl, and F/V Carolyn Marie.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would harm almost every single male in my family. We all salmon fish every single summer. Reduced harvest leads to reduced income, and the effects cascade from there — it is an avalanche effect on our community.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Chance Coleman  
Sitka, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Coltharp, and I am the Aquaculture Director of the Sheldon Jackson Hatchery and the Sitka Sound Science Center in Sitka, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals were adopted, they would impact the Sheldon Jackson Hatchery and the Sitka Sound Science Center in many ways, starting with cost recovery revenue. At present, cost recovery makes up less than 40 percent of our annual budget. In order to operate, the Sheldon Jackson Hatchery is subsidized by the Sitka Sound Science Center through research, education grants, and donations from seafood processors. A 25 percent reduction in pink and chum production could jeopardize all of the programs at the Sitka Sound Science Center, including education of high school and University of Alaska Southeast aquaculture students, workforce development and training programs, as well as our current and future research programs. We are currently conducting research on Yukon River Chinook smolt survival under a grant from the North Pacific Research Board, and I believe this is the type of research that needs to be done before proposals like these are even considered.

The 25 percent reduction in pink and chum production would affect our coho program, which is paid for mainly through cost recovery on pink and chum. This would have other effects throughout our community and tribal partners, reducing opportunities in subsistence and sport-caught fish at our hatchery. Because we are located in Sitka and so accessible to the community, we are able to provide pink, chum, and coho fish and eggs to tribal members and all subsistence users.

A loss of our coho program, community access to fish, and possible reduction in our programs at the Sheldon Jackson Hatchery and the Sitka Sound Science Center would be devastating.

These proposals are not based on science, and they represent a statewide blanket approach that does not take into account all the different regions of our very large state.

I believe there are many factors that could be relevant to salmon declines in some regions of Alaska, but mainly I feel the marine climate changes are the biggest issues and the hardest problem to study. Good science takes time, and diversions like these blanket proposals only delay good science.

Hatcheries are the reason we have stability, predictability, and sustainability in our fisheries, and why we now have commercial openings on wild stock salmon. I also think the Sheldon Jackson

Hatchery and its relationship with Indian River is a great example of that. The pink salmon runs were almost wiped out during the 1940s due to gravel removal to build the causeways during World War II here in Sitka. Today the run is healthy and robust, with all three species — pink, chum, and coho — in abundance.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

William Coltharp  
Sitka, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Connor, and I am a second-generation commercial fisherman and business owner in Petersburg, Alaska. I operate CRF Inc. and P&R Shipyard.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Any reduction in hatcheries would impact my bottom line in both of my businesses. It would affect crew income at a time when it is already strained and would lessen the crew pool that is already at historical lows. It would mean less revenue for the local businesses that serve commercial fishing, and it would put us in direct competition with sport fishermen because of fewer salmon available due to reduced hatchery production. We are already seeing this dynamic with halibut, where the sport sector is requesting a redistribution of commercial IFQ to their sector.

When hatchery production was created, our commercial fishing season was extended by months. It helped distribute the fishing fleet to other areas of opportunity closer to home, reducing pressure on local stocks. Any reduction in salmon production will affect income for all fishermen, whether boat owner, crew member, or a former spouse with children receiving reduced support.

Reduced hatchery production means less fishing time, more pressure on wild stocks, and fewer jobs.

One only has to look at the 2025 Puget Sound salmon returns or the British Columbia Fraser River returns to see the consequences of undermining hatchery programs. There are a whole lot of opinions out there without substance to back them up.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

William Connor  
Petersburg, Alaska



**Submitted by:** William Connor

**Community of Residence:** Petersburg

i oppose

---

**Submitted by:** Chelsey Cook

**Community of Residence:** Palmer

Madam Chair and Members of the Board,

Thank you for the opportunity to comment before the 2026 Statewide Board of Fish Meeting. My name is Chelsey Cook, I'm an Alaskan resident, sport fisherman, and commercial deckhand. Please find my public comments below.

Proposals 170, 171, 172 - OPPOSE

Alaska's hatchery programs are conservation tools, stabilizing fisheries and, most importantly, providing research and science that is needed to understand declining runs, changing environments, and salmon survival. This effort to gut Alaskan hatcheries of pinks is a misguided attempt by sport fishing groups to boost other salmon species, despite there not being enough evidence or research on wild and hatchery-stray pink salmon interaction and how those interactions may affect fitness or spawning habitat, and next to no research on how hatchery strays affect wild king salmon. King salmon are declining for a wide variety of reasons, which may include climate change, leaching heavy metals, rising water temperature, increased predation, prey availability, etc. Gutting hatcheries, which will also gut the coastal communities that rely on commercial fishing, will not save king salmon, and there is no firm evidence to support this.

These proposals also come at a time when state hatcheries are at capacity, and sport fishermen are simultaneously clamouring for more stocking programs. With state hatcheries at capacity, PNPs could be a fantastic resource to help meet sport stocking needs; however, losing up to 25% of their pinks and chums capacity will not put them in any financial position to do so. As a sport fisherman who has fished Crooked Creek hatchery kings, Ship Creek, and the Tailrace for years, I would love to see more stocking programs - however, I also realize that those stocking programs come from hatcheries, something that those clamouring for hatchery shutdowns don't seem to understand.

At this time, when more science is needed and wild stocks need increasingly more support, all user groups should be supporting our hatcheries as the conservation and research tools they are, not allowing sport fishing groups to attack them.

Proposals 164 and 165 - SUPPORT

I fully support both of these proposals, which intend to clean up the pelagic trawl fishery. Pelagic trawlers are not allowed to touch bottom in state waters; proposal 164 would simply enforce a regulation that is already in place.

Many salmon stocks around the state are in decline or listed under conservation concern; salmon excluders on pelagic trawl gear in state waters would help mitigate unintended impact on wild salmon populations.

Neither proposal inhibits the success of the pelagic trawl fishery, but just asks for conservation and regulatory compliance.

Proposal 187 - OPPOSE

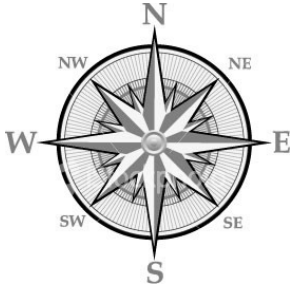
I strongly oppose proposal 187, and do not believe it should have even been picked up. I was at the work session when it came up as an ACR, and fully agree with the Department's comments that a river changing course is not an unforeseen emergency, and certainly not one warranted to be picked up out of cycle. Stream bed fluctuations are natural, always have been, and are likely to increase as our climate changes.

Further, there is no stock of concern in the Tsui, and every user group along the river is currently getting their fish. This is an allocative grab by the sport fish industry that would push the setnet fleet out of the Tsui, and further limit the setnet permit holders in Eshamy District. The Tsui is the only alternative for Eshamy permit holders, and pushing them out of the area would further decrease permit value and stability in that fishery.

Thank you,

Chelsey

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# COOK INLET FISHERMAN'S FUND

Non-Profit Advocate for all Commercial Gear Types in Area H  
 PO Box 39408 / Ninilchik, AK 99639 / Phone 907-252-2752 / Fax 907- 567-3306

Chairman and Board members,

Cook Inlet Fishermen's Fund represents commercial fishing interests in the Cook Inlet area. We are opposed to Proposal 186 and we think the Agenda Change Request should not have been approved for this proposal. This is a blatantly allocative proposal which was not supported by ADF&G staff because there isn't a conservation concern. It was inappropriate for the BOF to approve ACR 5 because it does not meet the criteria for consideration. ADF&G staff did not support the ACR 5 based on the criteria. As a purely allocative proposal, it should not be taken up out of cycle.

As to the merits of the proposal itself, it is extremely flawed. The proposal claims that commercial fishing has caused "a resulting shortage of Northern bound coho salmon". The truth is that the drift fleet catches somewhere around 1%-3% of the coho in Cook Inlet. The proposers of Proposal 186 might have you believe that the entire drift harvest of coho is headed to the Deshka or Little Su and so the harvest numbers look significant, but there are over 1,200 coho streams in Cook Inlet with total runs of around one to three million fish. Our 1%-3% harvest rate applies to the total run, including the Deshka and Little Su. A 1%-3% harvest rate on Northern Cook Inlet coho is hardly worth the ramifications that will be caused by proposal 186 restrictions, which will result in increasing the gross over escapements of other salmon stocks and the lost opportunity and commerce incurred by the additional restrictions placed on the commercial fleet.

For coho salmon, a generally accepted safe harvest rate is around 70% of the total run. With all user groups included, that harvest rate is not even close to being achieved. The restrictions already in place on the commercial fishing industry, which have caused such a low harvest rate on coho, have also caused gross over escapement of other stocks too. In 2025, over \$50 million was lost by the commercial fishing industry and around a quarter billion dollars lost to the State's economy because of the restrictions already in place. Adding more restrictions can only make that worse.

The proposers point to closures in the Deshka and the Little Su on sport fishermen as justification for this proposal, stating "even with inriver restrictions and closures, too many salmon had already been harvested". It's not mentioned that commercial fishermen have already faced draconian closures and restriction. If you ask Fish and Game how many silvers are caught in the time and area that this proposal aims to shut down, and then consider that those caught are heading for 1,200 different streams in Cook Inlet, you'll see how flimsy is the claim that the drift fleet is causing the problems in the Deshka and Little Su.

Also, both the Deshka and Little Su have been plagued with getting accurate escapement counts and should not be used as management tools for the drift fishery. The escapement goals for the Little Su were established and increased when there was enhancement of the run. When it was decided to end enhancement, the high escapement goals were kept causing unreasonable expectations. Commercial fishing should not be curtailed because of such poor management actions. It begs to be asked, why is it that out of the 1,200 coho streams in Cook Inlet, it's only the two most heavily sport fished and guided sport fish rivers (Deshka and Little Su) that have been faced with closures? With our 1%-3% harvest rate, it can hardly be blamed on commercial fishermen.

John McCombs, President



Alaska Board of Fisheries  
ADF&G, Boards Support Section  
P .O. Box 115526  
Juneau, AK 99811-5526

March 2nd, 2026

Re: Opposition to Hatchery Proposals 170, 171, 172

Dear Chair Carlson Van-Dort and Members of the Board of Fish,

On behalf of Copper River Seafoods, we respectfully submit this letter to express strong opposition to hatchery-focused Proposals 170, 171, and 172.

Copper River Seafoods is an Alaskan food manufacturer, headquartered in Anchorage, Alaska, dedicated to Alaska's economy, communities, and natural resources. At peak, we directly employ nearly 700 people and provide critical support to thousands of commercial fishermen and Alaska businesses throughout Southcentral, Southwest, and Far North Alaska. With primary processing facilities in Cordova and Naknek and buying stations in Kotzebue, Togiak, Whittier, Seward, and Homer, we sustain a network that drives Alaska industry. We operate a year-round added-value manufacturing facility and one of the largest cold storage facilities in Anchorage. Our year-round Anchorage food manufacturing operations are instrumental in ensuring food security in Alaska - we feed Alaskans through supplies to local grocery stores, restaurants, food banks, and other food distribution hubs year-round. Beyond supplying food, our company directly and indirectly supports thousands of Alaskan jobs in supporting industries such as technology and IT services, construction, transportation, and more.

We share the concerns of all Alaskans regarding fish abundance and long-term sustainability of our marine resources. Conservation and a precautionary approach are



essential. Policy decisions should be grounded in scale, context, and empirical evidence.

As shown in Figure 1 below, long-term North Pacific salmon abundance trends from 1952–2005 demonstrate that total biomass fluctuations align closely with documented ocean regime shifts in 1976–1977 and 1989. The bold gray line reflects total wild and hatchery salmon abundance across species. Major abundance changes correspond to large-scale ocean conditions rather than discrete hatchery production changes.<sup>1</sup>

Importantly, Alaska hatchery chum and pink salmon represent approximately 5.3% and 2.1% of total North Pacific salmon biomass, respectively. Adjusting Alaska hatchery production, therefore, represents a relatively small lever within a vast and climate-driven ocean ecosystem. Proposals imposing broad production cuts risk significant economic harm to fishermen, processors, coastal communities, and Alaska businesses statewide without demonstrated conservation benefit at the North Pacific scale.

### Figure 1. Salmon Abundance in the North Pacific (1952–2005)

Source: Ruggerone, G.T. *Magnitude and Trends in Abundance of Hatchery and Wild Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean.*

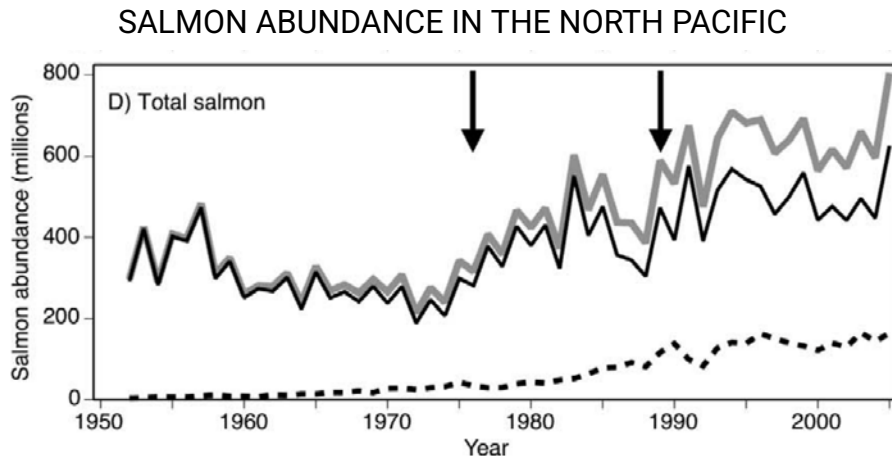


Figure 1. Annual adult abundance (catch plus number of spawners) of wild (solid lines) and hatchery (dashed lines) in the North Pacific. Bold gray line represents total wild + hatchery abundance. Arrows indicate 1976–1977 and 1989 ocean regime shifts.

### **These Cuts Are Coming at the Wrong Time**

The cuts being proposed come at a moment of profound environmental uncertainty. Tropical predators such as yellowfin tuna have expanded northward, increasing

predation pressure on juvenile salmon, while Western Alaska fisheries report significant numbers of Asian and Russian-origin chum and pink salmon competing along shared migration routes. At the same time, warming waters, marine heatwaves, and changing precipitation patterns are making some rivers and freshwater systems less hospitable to salmon during critical life stages. These large-scale climate and ecosystem shifts — not Alaska hatchery production — are driving much of the instability we are experiencing. In such conditions, conservation means strengthening Alaska’s hatcheries as a tool of resilience and stability for fishing families and coastal communities, not weakening them.

### **Hatcheries Are Alaska’s Stability Strategy**

Alaska’s hatcheries have proven — repeatedly — to provide stability to Alaskan industry.

Hatcheries underpin Alaska’s salmon resilience strategies, food systems, and working waterfronts. They support processors, tender fleets, municipal revenues, seasonal and year-round Alaska jobs, and long-term investment confidence in the state. They supply distinct sport, personal-use, and subsistence fisheries statewide. They are also an indispensable infrastructure for salmon research and adaptive management — providing broodstock analysis, disease monitoring, tagging programs, marine survival datasets, and rebuilding capacity for vulnerable stocks like king salmon.

**At a time of marine uncertainty and climate disruption, reducing one of Alaska’s primary adaptive tools is counterproductive to the shared burden of Conservation.** There is no clear evidence that hatchery production is threatening long-term sustainability of wild stocks. There is clear evidence that hatcheries support resilience in a changing ocean.

### **What Hatchery Cuts Mean for Copper River Seafoods**

For Copper River Seafoods, this is not theoretical.

Hatchery production ensures base-level throughput for our facilities, keeping per-pound costs competitive and sustaining the broader economic engine tied to Alaska seafood. When pounds decline, per-pound costs rise, but the impact does not stop at processors or coastal towns. A collapse in hatchery production would send shockwaves statewide—similar to the economic declines Alaska experienced during the oil downturn of the 1980s. Seafood is a multi-billion-dollar industry that supports hundreds of commercial businesses and thousands of direct and indirect jobs, from Anchorage freight and logistics companies to builders, fuel suppliers, welders, grocers, and small

independent businesses across the state. When seafood revenue contracts, it reduces spending throughout the Railbelt, accelerates out-migration, and weakens Alaska's overall economic stability. **This is not solely a coastal issue—it is a statewide economic issue with cascading effects far beyond the docks.**

For Copper River Seafoods, a direct hit of a 25% reduction in hatchery production would:

- Reduce access to Prince William Sound chum and pink salmon central to our year-round operations
- Shrink facility throughput and drive per-pound costs higher in both our Cordova and Anchorage locations
- Undermine contracts with Alaska and domestic customers for Alaska seafood, who rely on a consistent supply of pink and chum salmon
- Reduce access and economic opportunity for our all salmon user groups
- Contribute to the outmigration of the fleet and discourage new young fishermen from entering the industry
- Destabilize year-round Alaska employment in Anchorage and seasonal employment in Cordova
- Further destabilize Alaska's interconnected economy – from communities like Cordova, Valdez, Tatitlek, and Chenega that have already endured repeated economic shocks, to Anchorage and the broader Southcentral region, where seafood revenue underpins freight, manufacturing, construction, retail, and thousands of working families tied to the industry.

Reductions in hatchery production would directly erode municipal and state tax revenue at a time when Alaska can least afford it. Fisheries business taxes, fish taxes, landing taxes, fuel taxes, and the multiplier spending that flows from seafood activity contribute meaningful revenue to both the State and local governments. When pounds decline, taxable value declines. When processors scale back, payroll shrinks. When fishermen earn less, spending contracts. Coastal municipalities that rely heavily on fish tax revenue to fund schools, ports, harbors, and basic services cannot absorb that loss – the revenue base simply disappears. But this is not confined to coastal towns; reduced seafood throughput also weakens Anchorage's business activity and the broader tax base tied to freight, warehousing, equipment sales, construction, and professional services. In a state already facing significant budget pressure, deliberately shrinking one of Alaska's core revenue-generating industries compounds fiscal instability at both the local and statewide level.

### **Conservation Requires Alignment, Not Contraction**

We must conserve, but conservation cannot mean dismantling one of Alaska's primary

resilience tools without evidence that it will achieve the intended ecological outcome.

In a changing ocean, hatcheries are not the problem – they are part of the solution.

Proposals 170, 171, and 172 move Alaska away from stability, away from science-Based precision, and toward economic contraction without demonstrated conservation return. These proposals bypass Alaska’s established management process. Hatchery permitting and scientific oversight belong with ADF&G through Alaska’s existing management system. Using Board of Fish egg take reductions to drive hatchery policy circumvents science-based permitting, limits community input, and risks unintended statewide consequences.

For the sake of Alaska fishermen, processors, year-round Alaska jobs, food security, and the survival of coastal communities, **we respectfully urge the Board to take NO ACTION on Proposals 170, 171, and 172.**

Sincerely,  
Copper River Seafoods  
1400 East 1st Avenue  
Anchorage, Alaska 99501

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Richard Corazza, and I am a third-generation Alaskan fisherman, permit holder, and boat owner. I own and operate the Royal Fortune.

Hatchery production provides income stability, access to fish, and the ability for young people to enter the fishery. It is almost impossible to remain in business without substantial capital, and many young Alaskan fishermen already struggle to afford entry into the industry. Further reductions would make it even harder for resident fishermen to survive and remain competitive.

We should not implement policies that make it harder for working Alaskans to continue commercial fishing, especially when residents are already facing high costs for fuel, permits, and employing crew.

Bristol Bay has seen historic returns in recent years, and there has been no clear evidence demonstrating negative impacts from hatchery production. Hatchery programs should be supported and strengthened, not reduced.

Commercial fishermen employ Alaskans who grew up here. Many of us have borrowed significant amounts of money through the state and banks and employ multiple people each season. Shutting down hatcheries would benefit outside leisure interests while harming working Alaskan families and coastal communities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management

framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Richard Corazza  
Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Sonja Corazza. I am a lifelong Alaska commercial fisherwoman who lives in Homer and has seined in Prince William Sound for over 40 years. My family and I have relied on Alaskan fisheries for our sole income since my father started fishing in 1939. As a forty-year seiner in Prince William Sound, we have seen every aspect of salmon fishing through the good and bad times.

The hatchery program has been a great supplement to the wild stocks, and both have played an important role in keeping the fishery healthy for all users in the Sound, including both commercial and sport fishermen. It is not widely understood that commercial fishermen pay 73% of the hatchery silvers that sport fishermen rely on as their favorite salmon to catch. They are also allowed to harvest commercially designated pink salmon, and many do not understand how cost recovery or the fishery works. The public needs more education about why commercial seiners are catching the fish.

Any reduction in the amount of fish hatcheries are able to produce will damage all user groups. The natural survival rate, along with tremendous marine mammal predator numbers, has already cut hatchery stocks significantly. Scientific research in Southeast Alaska has shown that less than 43% of fry make it from release out to the ocean. Add ocean predation, large trawling numbers caught, and interception on the way back to the Sound, and it is remarkable that fish are returning at all.

If allowable egg numbers are reduced, it may decimate commercial small boat fishing for salmon in the Sound and severely impact the availability of silvers for sport fishermen. Hatchery fish releases by other countries far exceed Alaska's numbers, and if we reduce production, we risk losing market share. Market share for us means local Alaska communities are able to make a living, pay property taxes, hire crews, and teach young fishermen the business.

My husband and I own the Malamute Kid, a seiner in the Sound, and we each own a Prince William Sound seine permit. Our adult children each own a seiner, and our grandson is learning to work the deck and run the skiff. We hire local Alaskan crews from Homer and Valdez. We hire at least ten crew members each year and pay them a fair percentage of our catch.

If these proposals are adopted, I foresee loss of income for our families, crews, and local businesses that we support. Processors will be hurt and may go out of business if the supply of fish diminishes. As I have already stated, both our personal incomes and the economies of our communities will be severely damaged by reduction of harvest opportunity. We have a recent

example of what happened to processors, fishermen, and communities when prices dropped. With further problems, the local seafood industry may disappear, leaving only large corporate operations.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Sonja Corazza  
Homer/PWS, Alaska





**Submitted by:** Alan Corbett

**Community of Residence:** Juneau

To the Alaska Board of Fisheries,

On behalf of Adventures in Alaska, I'm submitting the following comments for the proposals scheduled for consideration at the Board's March meeting.

Oppose Proposal 170

I strongly oppose Proposal 170. It would negatively impact Southeast Alaska residents and visitors who depend on salmon resources for commercial fishing, sport fishing, personal use, subsistence, education, and broader community benefit.

The Douglas Island Pink and Chum (DIPAC) programs are foundational to fisheries and public access in our region. They support commercial fisheries in Lynn Canal and Taku Inlet, sport fisheries for Chinook and coho near Juneau, personal use fisheries at Sweetheart Creek, and education programming at the Ladd Macaulay Visitor Center.

DIPAC has no intention of increasing chum production and is already maxed out on available water and land use. There is no evidence Proposal 170 would provide a measurable benefit to wild salmon stocks, while the harms are clear: it would damage existing fisheries, community programs, and access for residents and visitors.

DIPAC has worked collaboratively for decades with ADF&G, NMFS, NOAA, UAF, USFS, and UAS to study hatchery-wild interactions, including participation in the Alaska Hatchery Research Project. Existing research does not justify the restrictions proposed in Proposal 170.

Oppose Proposal 172

I also oppose Proposal 172. A statewide moratorium on any increase in pink and chum hatchery egg take unnecessarily limits future flexibility and adaptive management. Even where no increases are currently planned, a blanket restriction removes tools that may be needed to respond to changing environmental conditions, stock performance, or management needs.

Alaska hatchery programs already operate under a rigorous permitting and oversight framework, making this additional restriction unwarranted.

Support Proposals 176 and 177

I support Proposals 176 and 177, which clarify and allow for pooling of bag and possession limits on a vessel. These proposals reflect how fishing actually occurs in group and charter settings, reduce unintentional violations, and improve clarity for both anglers and enforcement. They are practical adjustments that benefit lawful participation without increasing harvest.

Support Proposal 178

I support Proposal 178. Clarifying bag limit attribution when assisting another angler helps prevent accidental violations and reduces unnecessary release mortality. This is especially important in guided and charter fisheries, where crew assistance is common and intended to ensure safe, ethical, and successful fishing.

Oppose Proposals 179 and 180

I oppose Proposals 179 and 180, which would impose statewide annual limits on Chinook salmon. These proposals fail to recognize the unique management structure of Southeast Alaska salmon fisheries, including the role of the Pacific Salmon Treaty. A statewide cap risks reducing opportunity for Southeast Alaska residents, visitors, and charter businesses without a clear conservation benefit, while creating unnecessary complexity and inequity across regions.

## Closing

Taken together, Proposals 170, 172, 179, and 180 introduce unnecessary risk to Southeast Alaska's balanced fisheries management system and threaten economic stability, community food security, and access for both residents and visitors. In contrast, Proposals 176, 177, and 178 are practical improvements that enhance compliance and reduce unintended harm.

For these reasons, Adventures in Alaska respectfully urges the Board to oppose Proposals 170, 172, 179, and 180, and to support Proposals 176, 177, and 178.

Thank you for your time, your consideration, and your continued commitment to science-based, inclusive fisheries management.

Respectfully submitted,

Captain Alan

Adventures in Alaska

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PC120

**Submitted by:** Nick Corbin

**Community of Residence:** Nikiski

Dear Commissioner and Board Members,

I am writing to formally request that the Alaska Department of Fish and Game prohibit trawling in Alaska state waters.

Trawl fisheries, whether categorized as bottom or midwater, operate at industrial scale and remove massive volumes of biomass from Alaska's marine ecosystem. Pollock, herring, and other forage species are foundational to the food web. When these species are harvested at high volume, the ecological effects move through the system, impacting salmon, halibut, crab, marine mammals, and seabirds.

Bycatch remains an unavoidable and documented component of trawl fisheries. Non-target species including Chinook and chum salmon, halibut, crab, rockfish, and other groundfish are intercepted annually. While limits are set, they do not eliminate mortality. When bycatch thresholds are reached, effort often shifts geographically rather than reducing overall pressure. Meanwhile, resident subsistence users, sport fishermen, and small-boat commercial operators face tighter restrictions, reduced opportunity, and closures in the name of conservation.

Alaska's coastal residents are absorbing the ecological and economic consequences. Charter businesses, tourism operators, subsistence families, and local commercial fishermen depend on healthy, stable stocks. When stocks decline or habitat is compromised, it is local communities that pay the price. The majority of profits from large scale trawl operations leave the communities most directly affected, while Alaskans shoulder the long-term impacts.

Article VIII of the Alaska Constitution requires that fisheries be managed on the principle of sustained yield for the maximum benefit of the people. Continuing industrial trawling in state waters while resident users face increasing restrictions undermines that mandate and public trust.

For the long-term stability of Alaska's fisheries, ecosystems, and coastal economies, I respectfully urge ADFG and the Board of Fisheries to prohibit trawling in Alaska state waters and prioritize conservation and resident benefit.

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February 10, 2026



CORDOVA DISTRICT  
**FISHERMEN**  
— UNITED —

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## Re: Statewide Board of Fisheries Proposals

Dear Chair Carlson Van-Dort and Members of the Board,

On behalf of Cordova District Fishermen United (CDFU) and our members across Prince William Sound and coastal Alaska, we respectfully submit this comment in response to the statewide finfish and supplemental proposals. The majority of our comments focus on **strong opposition to hatchery-focused Proposals 170, 171, and 172.**

Hatchery system changes should be targeted and science-driven, and 170-172 are not. They are blunt mandates that pose significant economic and access risk for all users without evidence of conservation benefit.

**Hatcheries underpin Alaska's salmon resilience strategies, food systems and working waterfronts.** They support processors, tender fleets, seasonal jobs, municipal revenues, and long-term investment confidence in coastal communities. Just as important, they supply distinct sport, personal-use, and subsistence fisheries statewide. They are indispensable infrastructure for salmon research, recovery, and adaptive management, providing long-term data, technical expertise, broodstock analysis, disease monitoring, and essential rebuilding capacity.

Blanket reductions lead quickly to reduced access, fewer fishing opportunities, diminished scientific capacity, and increased pressure on already constrained wild stocks. Blunt cuts that are outside the established permitting system lack nuanced strategy and erode staff capacity, funding, governance stability and critical scientific functions.

CDFU urges the Board to take **no action** on Proposals 170, 171, and 172. Thank you for considering our comprehensive comments, provided below.

Sincerely,

**Michael Hand**, President, Cordova District Fishermen United

## POSITION SUMMARY

The majority of pages below provide our rationale to **OPPOSE** 170, 171 and 172. Starting on page 9, we have included rationale for these additional positions:

- Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear: **SUPPORT**
- Proposal 165 – Require salmon excluders for pelagic trawl gear: **SUPPORT**
- Proposal 174 – Seine vessel/skiff engine operation requirements: **SUPPORT**
- Proposal 175 – Dipnet mesh and configuration requirements: **SUPPORT**
- Proposal 180 – Annual Chinook bag limit for sport fish: **SUPPORT**
- Proposal 187 – Close Tsiu River and near-shore area to commercial fishing: **OPPOSE**

## HATCHERY POSITION PILLARS

### 1 | THE VALUE OF PRECISION MANAGEMENT

**Hatchery reform must be grounded in rigorous science and precision management that recognizes chum and pink production as the financial backbone supporting research, recovery, and regional opportunity. Blunt cuts destabilize integrated hatchery systems, weaken institutional capacity, and fail to resolve the complex ecological questions raised by Proposals 170, 171, and 172.**

CDFU recognizes that hatchery programs, like all fisheries management systems, must continue to evolve in response to changing environmental conditions, emerging science, and shifting ecosystem dynamics. We support thoughtful adaptation grounded in rigorous data, peer-reviewed research, and structured hatchery management processes. Blunt production cuts are not a fitting substitute for that work.

Prince William Sound hatcheries operate as integrated systems. The chum and pink salmon programs are not simply production lines; they are the economic engine that funds the broader mission of these facilities. Cost recovery from chum and pink releases directly supports research and monitoring, enhancement and recovery programs, sport and subsistence opportunity, infrastructure maintenance, and decades-long datasets that underpin adaptive management. Reducing egg take or release levels without a strategic framework does not just affect a single species or output. It destabilizes the entire system.

This matters because hatcheries are not static or superfluous institutions. They are among Alaska's most important applied science platforms. They generate longitudinal data on marine survival, juvenile performance, run timing, and stock productivity. They support tagging programs, monitoring infrastructure, and regional evaluation work that informs both enhancement and wild stock management. Weakening these institutions through preemptive production cuts risks undermining the very capacity needed to answer the questions currently being raised. Prince William Sound specifically has invested in monitoring and research that informs the entire salmon system. Destabilizing it undermines continuity and ongoing learning critical to building the iterative information streams and management adjustments that make a truly responsible system.

Concerns around hatchery stray rates provide a clear example. Straying is best addressed through improved imprinting techniques, release strategies, timing adjustments, and

facility-specific operational refinements. These precision tools are the difference between short-term guess work and long-term responsive management. Across Alaska and internationally, advances in imprinting practices have demonstrably reduced straying when properly implemented. Broad reductions in egg take do not meaningfully target this issue and instead diminish the resources available to improve the underlying mechanisms.

Research from the 14-year Alaska Hatchery Research Program offers important context on hatchery straying. Studies show that hatchery fish that stray into wild streams produce fewer returning adult offspring than wild fish, but this disadvantage fades over generations. By the second generation, the offspring of hatchery strays perform much closer to wild fish (Shedd et al. 2022; Shedd et al. 2026, Alaska Marine Science Symposium). This may explain why streams like Hogan Creek, which has received up to 60% of its spawners from hatchery strays for decades, continue to sustain wild populations. The offspring of those strays effectively become wild fish within a few generations. Consistent with this, Prince William Sound pink salmon escapement has not declined as hatchery production has grown since the 1970s, and odd-year returns have actually increased. Statistical modeling supports the same conclusion: May et al. (2024) found that continued hatchery production does not continuously reduce fitness in wild populations, and McMahan et al. (2025) found that natural variation persists in wild populations despite many generations of hatchery influence. Taken together, the science does not support the premise that current hatchery production levels are harming wild pink salmon in Prince William Sound.

Similarly, while questions about ocean carrying capacity and ecosystem interactions deserve serious attention and study, there is currently very limited empirical understanding of how Alaska hatchery production influences baseline marine food webs. There is even less evidence capable of resolving whether hatchery-origin salmon meaningfully affect river systems located hundreds or thousands of ocean miles away. These are complex, basin-scale questions involving climate variability, plankton productivity, predator-prey dynamics, and interannual oceanographic change. The most current data on this question comes from the International Year of Salmon (IYS), a multi-year multi-nation initiative including a 2022 high-seas expedition. Salmon distributions at sea are temperature-driven and species-specific (Langan et al. 2024). Pink and chum salmon show the greatest spatial co-occurrence, while Chinook and coho distributions are less overlapped with other species (McKinnell et al. 2024). As of a recent literature search (February 2026), we found no peer-reviewed literature establishing a causal link between Alaska hatchery pink salmon production levels and reduced Chinook salmon abundance or size.

They are also intertwined with international hatchery and wild populations throughout the entire North Pacific. To put Alaska's role in the North Pacific in perspective: Alaska hatchery pink salmon represent approximately 2.1% of the total combined adult and immature biomass of pink, chum, and sockeye salmon in the North Pacific, and Alaska hatchery chum represent 5.3% (Templin 2024). The vast majority of hatchery production in the North Pacific originates from Japan, Russia, and other Pacific Rim nations. For instance, 19% of the hatchery pinks and chums released into the North Pacific is of Alaska origin (Ruggerone & Irvine (2018) supplementary data). We have no reason to think that even a drastic Alaska reduction would affect these still unmeasured ecosystem-level interactions. Meaning, drastic

Alaska cuts would be guess-work measures whose only certainty is to hamstring our existing salmon research and recovery infrastructure.

CDFU agrees that these dynamics warrant ongoing study. But it is precisely for this reason that hatchery programs must remain robust. Precautionary and effective management in this case would be targeted research and monitoring rather than preemptive cuts. It would include coordination across public and private research institutions to reduce uncertainty — through expanded stock and food web indexes, trophic monitoring, cohort comparisons, etc. Preemptively cutting production before establishing clear causal pathways risks weakening the institutions best positioned to advance salmon survival science, marine ecology research, and recovery strategies. Adaptive management depends on sustained monitoring capacity, not diminished infrastructure.

Effective hatchery reform requires deliberate, regionally informed processes that prioritize operational improvements, targeted research, and iterative evaluation. It requires building on decades of peer-reviewed Prince William Sound hatchery science, strengthening imprinting and release protocols where needed, and expanding collaborative research into marine survival and ecosystem interactions. Large-scale, immediate production reductions do not accomplish these goals.

Viewed through this lens, Proposals 170, 171, and 172 rely on blunt mechanisms to address complex challenges. Proposal 170 introduces broad reductions in egg take without a corresponding adaptive framework. Proposal 171 advances regional production cuts without demonstrating how such actions improve stray rates, wild stock performance, or ecosystem outcomes. Proposal 172 further constrains hatchery operations while offering no clear pathway for replacing lost research capacity or funding for recovery work.

Each proposal treats production volume as a proxy for ecosystem stewardship. In practice, this approach risks eroding the scientific, economic, and operational foundations of Alaska's hatchery system. Strategic adaptation requires precision tools, not across-the-board reductions. If Alaska is serious about strengthening salmon resilience, improving wild stock outcomes, and advancing ecosystem understanding, the path forward lies in targeted operational refinement and sustained investment in hatchery-based science, not in destabilizing the very programs equipped to lead that work.

## **2 | SHARED BENEFITS, REGIONAL STEWARDSHIP**

**Hatchery programs deliver substantial sport, subsistence, personal use, and community benefits across Alaska, and must be managed regionally through science-based, community-led processes rather than constrained by statewide mandates that undermine multi-user opportunity and local stewardship.**

Hatchery programs are foundational to Alaska's mixed-use fisheries. They provide critical access for sport, subsistence, and personal use harvests while also supporting commercial fisheries that sustain coastal economies. These benefits are not abstract or incidental. They are direct outcomes of long-standing regional investments, partnerships, and adaptive management frameworks.

Across the state, many high-use recreational and subsistence fisheries depend heavily, and in some cases entirely, on hatchery production. Kodiak's sport fishery is deeply interconnected with hatchery resources, supporting both resident and visiting anglers while generating meaningful local economic activity. These programs would be unfeasible without their well established partnership. Sport programs around the Kodiak Archipelago depend upon the hatcheries for rearing capacity, infrastructure, distribution and ongoing biological assessment. Additionally, there has been a noticeable shift in sport effort from wild coho and king stocks to hatchery coho and king populations that has meaningfully alleviated pressure on the smaller wild runs. These are significant benefits to not only sport and subsistence users, but also to sensitive salmon populations. Most of it built upon the infrastructure developed and now supported directly by pink and chum cost recovery.

In recent outreach efforts conducted by ADFG Sportfish Division, Alaska anglers weighed in on stocking programs they'd like to see expanded or replicated in other areas. Alaska's William Jack Hernandez Sport Fish Hatchery only produces a portion of the smolt used in these stocking programs, and they rely on the data and analyses produced in private-non-profit (PNP) hatcheries around the state. In recent years, PNP hatcheries have taken over production and management for some of these state stocking programs in their entirety.

Prince William Sound Aquaculture Corporation has re-absorbed the chinook stocking programs in Cordova and Whittier, stocking 100,000 chinook in each location. The State had been running them for more than 25 years, however, but asked to redistribute the two programs out of the William Jack Hernandez Hatchery to make room for other chinook enhancement projects around the state.

PWSAC also plans to continue its Chenega program, which stocks approximately 50,000 chinook smolt; and is moving toward permitting and providing a 20,000 chinook smolt request from Tatitlek. These are the dynamic and widely beneficial programs empowered by Alaska's hatchery system.

In Prince William Sound, hatchery partnerships have substantially expanded subsistence access for sockeye salmon, offering reliable harvest opportunity that would not exist without enhancement from the Main Bay Hatchery. Community and Indigenous organizations in the region can speak in detail about the importance of those fishing opportunities for community members in rural areas across Prince William Sound.

In Southcentral Alaska, fisheries such as Resurrection Bay sockeye and coho sport stocking, Dudiak Lagoon, Ship Creek, and China Poot are entirely or overwhelmingly hatchery supported, providing accessible opportunities for sport, personal use, and subsistence users alike.

Hatchery programs also increasingly serve as strategic platforms for salmon recovery. Hatcheries are being actively leveraged to support king salmon rebuilding initiatives at a time when Chinook populations face acute climate-driven pressures, including warming freshwater habitats, changing marine productivity, and reduced juvenile survival. Kings are among the most climate-sensitive salmon species, and rebuilding efforts require every

available tool. Hatchery-based supplementation, monitoring, and research are essential components of these strategies. Undermining hatchery operations today directly jeopardizes Alaska's ability to sustain the scientific and institutional capacity needed to carry this recovery work forward.

Also important is the role of both local and Indigenous partnership within hatchery systems, particularly in Prince William Sound. Alaska Native communities engage directly in hatchery-supported commercial, subsistence, and recreational fisheries, while also participating in management processes, enhancement planning, and regional stewardship. Local ADFG sport programs and community development organizations have also built long-term partnerships with their local hatcheries. These relationships and the programs they support reflect a model of shared responsibility grounded in place-based knowledge, cultural continuity, and long-term ecosystem care. CDFU supports community-led programs and collaborative governance structures that empower local leadership to guide fisheries enhancement and adaptation. Place-based conditions differ, meaning that place-based, locally-informed tools are more effective.

Hatchery benefits are inherently regional. They are shaped by local watersheds, community priorities, infrastructure realities, and ecological conditions. Effective management therefore requires two essential elements: excellent science and regional leadership. Statewide mandates that impose uniform production cuts or operational freezes against the advice of local leaders cannot account for these differences and risk dismantling successful local programs. Decisions driven by stakeholders hundreds or even thousands of miles removed from affected communities, including proposals originating from Kenai-based sport lodges, should not override the stewardship authority of coastal regions that bear both the ecological responsibility and economic consequences of hatchery management.

CDFU believes that where challenges are identified, solutions must emerge through regional processes grounded in data, collaboration, and institutional knowledge. Community-led refinements offer a constructive path forward. Broad reductions and operational freezes do not. They erode multi-user opportunity, weaken Indigenous partnerships, and compromise the adaptive capacity of hatchery systems that currently serve as one of Alaska's most effective tools for supporting resilient fisheries. We support region-specific performance metrics, structured iterative review, and nuanced adjustments that target distinct goals.

Taken together, Proposals 170, 171, and 172 threaten to unravel regionally successful, multi-user hatchery programs by imposing blunt constraints that reduce opportunity for sport, subsistence, commercial and personal use harvests while undermining regional partnerships and recovery efforts for climate-vulnerable stocks like king salmon. These proposals weaken community-led management systems without offering viable alternatives for sustaining access, rebuilding runs, or maintaining the scientific and institutional capacity required for long-term salmon resilience.

### **3 | COMMUNITY RESILIENCE & STABILITY**

**Hatcheries function as critical regional infrastructure supporting food security, economic resilience, and climate adaptation. Alaska's long-term competitiveness depends on**



**continued innovation and investment in these systems, not blunt production cuts that destabilize coastal communities and weaken adaptive capacity.**

Hatchery programs are foundational to Alaska's coastal resilience. Beyond supporting fisheries production, they provide essential infrastructure for food security, applied science, and climate response. For many rural and Indigenous communities, hatcheries are trusted tools for bolstering local wild food resources, rebuilding depleted stocks, and advancing collaborative stewardship rooted in place-based knowledge. They also provide access to monitoring, tagging, and research capacity that communities rely on to understand changing marine conditions and salmon survival in an era of accelerating climate impacts.

These systems are not static, and CDFU recognizes that hatchery programs must continue to evolve. But meaningful change must occur through regional problem solving and rigorous scientific review. The proposals under consideration attempt to apply science that is either narrowly scoped or so broadly generalized that resulting conclusions remain speculative and disconnected from regional realities. Such approaches do not enable strategic adaptation. They replace it with blunt constraints that fail to account for local ecosystems, community priorities, or operational interdependencies.

More broadly, Prince William Sound communities are already navigating substantial uncertainty across multiple fronts, including climate impacts, rising operational costs, workforce challenges, and evolving seafood markets. Layering drastic and unpredictable management changes on top of these pressures does not create space for thoughtful adaptation or diversification. Fishermen, processors, and communities need stability and predictability to make systematic investments, explore new markets, and strengthen local economies. Real resilience comes from deliberate, transparent transitions that allow time for alignment and adjustment. And those transitions should be validated by comprehensive science.

In Prince William Sound, the economic costs of straying fish are real and already being internalized by hatchery operators. A 2024 economic analysis of hatchery straying using Alaska pink salmon data found that hatchery fish that stray to wild streams represent \$1–8 million in lost revenues per year (May and Westley 2024). Cutting egg take reduces total production and revenues across the board without addressing the underlying mechanisms that cause straying. Alternative approaches to reducing straying, such as improved imprinting techniques and timing adjustments, may prove more effective in reducing straying while potentially recouping lost revenues by returning more fish to intended harvest areas.

Hatcheries underpin processing capacity, tender fleets, harbor revenues, and year-round employment across coastal Alaska. They support workforce stability and infrastructure investment while anchoring regional seafood supply chains. This includes trained staff, long-term technicians, broadly used data and data expertise – all of which have applications beyond commercial production and support a broader network of marine trades. When production is abruptly reduced, impacts cascade outward, destabilizing processors, disrupting logistics networks, and weakening community services that depend on a

functioning working waterfront and waterfront workforce.

Economic uncertainty discourages capital investment and erodes long-term planning, leaving communities more vulnerable to external shocks. These effects extend well beyond commercial fleets, influencing municipal revenues, local businesses, and essential services. Looking forward, Alaska's ability to remain resilient and competitive in a changing global seafood economy depends on continued innovation and investment in hatchery programs. Hatcheries are not a departure from Alaska's fishing heritage. They are one of the primary ways that heritage adapts and survives. They provide platforms for recovery, experimentation, and climate resilience at a time when fisheries face unprecedented environmental variability. This does not mean that we should avoid researching questions around ecosystem interactions or adapting best practices. It means that we should do that with collaboration and intention within the foundational system that we have today.

Taken together, Proposals 170, 171, and 172 threaten this foundation by introducing blunt production constraints that destabilize fragile coastal economies while offering no viable framework for maintaining food security, scientific capacity, or community-led adaptation. Rather than strengthening Alaska's long-term resilience and competitiveness, these proposals risk accelerating uncertainty and undermining the regional systems that make durable futures possible.

#### **4 | GOVERNANCE STABILITY & SCIENTIFIC OVERSIGHT**

**Alaska's hatchery system operates under one of the most rigorous scientific and regulatory frameworks in the world. Responsible decision-making depends on clear jurisdictional authorities, process integrity, and science-based oversight.**

The Board of Fisheries has an important role in hatchery regulation, in that it can amend specific permit terms around egg take. Our concern here is the scale and structure of proposed constraints, relative to the established permitting framework and the Board's important but very specific role within it.

Alaska statute clearly assigns responsibility for issuing, altering, suspending, and revoking hatchery permits — including the authority to approve egg take, release sites, broodstock sources, and other core aspects of hatchery operations — to the Commissioner of the Alaska Department of Fish and Game and the department's permitting process. This statutory authority is found in AS 16.10.400-16.10.470 and related sections, which detail the comprehensive permitting, planning, and ongoing reporting obligations for hatchery programs. The Alaska Board of Fisheries may, after a permit has been issued, amend permit terms relating to salmon egg source and number, and designated harvest locations through its regulatory process.

This statutory framework reflects a carefully calibrated division of powers. It ensures that operational and biological aspects of hatchery performance are reviewed and permitted within a technically grounded process that includes regional planning teams, technical reviewers, and public comment opportunities through the permitting cycle. The Board's role in modifying specific permit terms provides a check where appropriate, but it does not give

the Board authority to preclude permitting authority by imposing sweeping production freezes, which effectively override core elements of the permitting authority vested in the department. Past legal analysis has emphasized that efforts to effectively revoke permit authority or to pre-emptively prevent otherwise standard aspects of permit issuance (such as permitting egg take as a part of a distinct hatchery operation) could be viewed as exceeding the Board's statutory authority under AS 16.10.440(b).

None of the 3 proposals under consideration provide an amendment and accompanying rationale to be applied to a specific hatchery permit, nor could they be adapted to do so without drastically changing the substance of the proposal to something well beyond what the public was able to comment upon.

Alaska's hatchery oversight regime is among the most rigorous globally, encompassing detailed permitting requirements, monitoring, genetics review, annual reporting, and adaptive management provisions. It is designed to supplement wild systems where appropriate and continually evaluates operations in light of emerging science and conservation goals. Research uncertainty — including gaps in ocean carrying capacity, marine survival, or stray dynamics — should not be used as a justification for sweeping, statewide production mandates that are disconnected from regional performance, statutory authority, and structured scientific review.

The integrity of the public process is equally important. Comprehensive public input is a cornerstone of Alaska's fisheries regulatory system, giving individuals and organizations representing tens of thousands of directly impacted Alaskans the ability to assess, testify on, and influence proposed changes. If the Board were to substantially alter these proposals at the table in ways that circumvent robust public comment, it would set a concerning precedent, undermining transparency, eroding confidence in regulatory fairness, and preventing regionally affected communities from fully engaging in decisions that materially affect their livelihoods and ecosystems.

Stable governance and jurisdictional clarity are essential to preserving predictable management systems that support long-term capital planning, community investment, and scientific continuity. Unintended statewide consequences arising from broadly applied mandates — especially when they exceed the Board's statutory authority — risk destabilizing coastal programs, undermining the adaptive management frameworks that have served Alaska well, and setting unstable precedent for future management decisions. Taken together, Proposals 170, 171, and 172 move Alaska away from its established framework of science-based permitting, regional oversight, and transparent public process.

Proposal 170 advances production reductions without engaging the existing hatchery permitting and review system designed to evaluate biological performance regionally. Proposal 171 introduces broad constraints that risk bypassing commissioner-led oversight and setting unstable precedent for future management decisions. Proposal 172 further compounds these issues by proposing operational freezes that undermine predictability for communities and operators while offering no clear mechanism for scientific evaluation or adaptive refinement. Collectively, these proposals replace structured governance with blunt

mandates, weakening both public process integrity and Alaska’s carefully balanced system of hatchery oversight.

## 5 | PARTNERS IN WILD STOCK CONSERVATION

**Alaska’s hatchery programs are integrated conservation tools that support wild stock recovery through monitoring, supplementation, and applied research, and weakening these systems risks reducing—not improving—our ability to understand, protect, and rebuild naturally spawning salmon populations.**

Hatcheries in Alaska were never designed to replace wild salmon. They were built to supplement natural production where appropriate, stabilize fisheries in variable environments, and provide the scientific infrastructure needed to evaluate stock performance over time. In Prince William Sound and across the state, hatchery programs operate alongside wild stock management through comprehensive monitoring, genetics review, tagging, escapement tracking, and adaptive operational changes informed by decades of peer-reviewed research.

These programs generate some of Alaska’s most valuable long-term datasets on marine survival, run timing, age composition, and productivity trends. Hatchery facilities serve as platforms for applied science, supporting coded-wire tagging, otolith marking, juvenile assessments, and broodstock analysis that directly inform wild stock conservation strategies. This work helps managers detect shifts in productivity, evaluate harvest impacts, and identify recovery opportunities in a changing climate.

Importantly, hatcheries are increasingly being used as strategic tools for rebuilding vulnerable stocks, including king salmon. Chinook are among the most climate-sensitive salmon species, facing warming freshwater habitats, altered marine food webs, and reduced early-life survival. Hatchery-supported supplementation, monitoring, and experimental releases provide essential pathways for rebuilding runs while advancing understanding of life-cycle bottlenecks. Reducing hatchery capacity at this moment directly undermines Alaska’s ability to respond to these challenges with science-based solutions. Concerns about hatchery-wild interactions, including straying or competition, are best addressed through operational refinement and targeted research, not broad production cuts.

There is limited empirical evidence capable of linking Alaska hatchery production to impacts on distant watersheds hundreds or thousands of miles away. While these questions deserve continued study, speculative or generalized findings cannot substitute for region-specific performance data. Alaska’s hatchery system already provides one of the strongest platforms available for advancing this research. Weakening that system reduces our ability to answer the very questions being raised.

Effective wild stock conservation depends on maintaining strong hatchery institutions, not diminishing them. Adaptive management requires sustained operational capacity, institutional knowledge, and collaborative regional governance. When hatchery programs are destabilized, Alaska loses critical tools for recovery, monitoring, and innovation at precisely the time they are most needed.

Viewed through this conservation lens, Proposals 170, 171, and 172 risk constraining Alaska's ability to protect wild stocks by reducing hatchery-based research capacity and adaptive flexibility. Rather than strengthening conservation outcomes, these proposals impose blunt limitations that disconnect enhancement programs from the science-driven frameworks designed to support wild salmon resilience. Perhaps most consequentially for the conservation rationale underlying Proposals 170, 171, and 172, May et al. (2024) found that when simulated hatchery production was ceased after 25 generations, natural-origin population sizes returned to pre-hatchery levels, meaning that hatchery strays have been supplementing wild population abundance in Prince William Sound. We caution against treating production cuts as a conservation-neutral or conservation-positive action. Reducing hatchery output could reduce natural-origin fish abundance alongside hatchery-origin abundance, an outcome directly at odds with the stated conservation rationale of these proposals. The Board should weigh this finding carefully before acting.

## OTHER PROPOSALS

**Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear: SUPPORT**  
CDFU supports Proposal 164, which would implement bottom-contact monitoring requirements for pelagic trawl gear operating in state waters.

Alaska already maintains two clear regulatory standards: bottom trawling is prohibited in most state waters, and pelagic trawl gear is explicitly defined as gear that does not contact the ocean floor. Proposal 164 simply provides a practical mechanism to verify compliance with those existing rules. Monitoring requirements are not punitive; they are a reasonable and necessary step to ensure that all fleets are operating within their gear definitions and regulatory boundaries, preserving both ecological protections and public confidence in Alaska's fisheries management system.

Our members operate in diversified commercial fisheries throughout Prince William Sound and the Gulf of Alaska, and adhere to a suite of regulatory requirements including lawful use and operation of gear permitted for our fisheries. Proposal 164 offers a path to align pelagic trawl operation with regulation.

It is important that that pathway be built with success in mind. CDFU supports Alaska's commercial fishing fleets and recognizes the importance of providing pathways that allow fisheries to adapt effectively. We believe Proposal 164 can and should be implemented through an iterative development process that includes collaboration with industry, technical refinement, and phased implementation where appropriate. Thoughtful rollout matters. Clear expectations, workable tools, and feedback loops with impacted stakeholders are essential to successful adoption.

Sustainable fisheries require enforceable standards that apply equitably across all gear types. Monitoring requirements help ensure regulatory clarity, protect benthic habitats where bottom contact is prohibited, and create consistency in how compliance is demonstrated across Alaska's fisheries.

CDFU supports Proposal 164 as a measured step toward transparent, enforceable operations that uphold existing regulations while allowing room for adaptive implementation. We encourage the Alaska Board of Fisheries to advance this proposal in a way that supports both fleet viability and Alaska's long-standing commitment to accountable, science-informed fisheries management.

**Proposal 165 – Require salmon excluders for pelagic trawl gear: SUPPORT**

CDFU supports Proposal 165, which would require salmon excluders on pelagic trawl vessels operating in state waters.

Salmon excluder technology is not experimental. These tools are already near-universally implemented in the Bering Sea trawl fleet, where they have demonstrated consistent success in reducing salmon bycatch while maintaining viable fishing operations. Their track record shows that conservation outcomes and commercial performance do not have to be mutually exclusive.

Salmon conservation is equally critical in the Gulf of Alaska, where multiple stocks face ongoing challenges tied to climate variability, freshwater habitat stress, and changing marine conditions. Implementing proven bycatch reduction tools represents a practical, science-informed step toward protecting vulnerable runs while sustaining productive fisheries.

CDFU supports Alaska's commercial fishing fleets and recognizes the importance of ensuring that fisheries have workable pathways to adapt and succeed. We encourage an iterative implementation process for Proposal 165 that includes collaboration with industry, technical refinement, and phased adoption where appropriate. Thoughtful rollout matters. Clear expectations, accessible equipment standards, and feedback loops will help ensure successful integration.

Responsible fisheries management also depends on meaningful application of known conservation tools. Salmon excluders provide a demonstrated mechanism to reduce unintended impacts while maintaining operational viability, and their use aligns with Alaska's long-standing commitment to science-based stewardship.

CDFU supports Proposal 165 as a constructive measure that advances salmon conservation while allowing room for adaptive implementation. We encourage the Alaska Board of Fisheries to move this proposal forward in a way that supports fleet success, accountability across gear types, and the protection of Alaska's shared salmon resources.

**Proposal 187 – Close Tsiu River and near-shore area to commercial fishing: OPPOSE**

CDFU opposes Proposal 187 and urges the Board to take no action. It is fundamentally allocative in nature and would close a longstanding commercial fishery that has supported resident fishermen from Yakutat and Cordova for generations, effectively reallocating the resource to nonresident sport users who already experience high catch success.

There have been two salmon seasons since the river mouths converged, both of which had successful commercial fisheries, strong escapements and ample sport harvest. Sport users have not struggled to achieve bag limits or access the fishery.

There is not a conservation concern, nor an access concern. Rather than advance conservation outcomes, the proposal introduces new and completely unnecessary conflicts between user groups while destabilizing regional management. Without the commercial fishery operating on this healthy population, there is a significant likelihood of over-escapement. Thus the proposal risks eliminating access for community-based commercial harvesters without demonstrating biological necessity or providing a balanced framework for shared use, all while removing demonstrably effective management tools. Adoption would set a troubling precedent by resolving allocation disputes through closures rather than through collaborative, regionally informed management.

CDFU supports conservation-driven decisions grounded in sound science and local leadership. Proposal 187 offers neither. It disregards Indigenous fishing traditions and small boat commercial access tied to this area and undermines equitable access to a shared public resource. For these reasons, CDFU respectfully asks the Board to take no action.

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Phone 907-424-5555  
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P.O. Box 20 Cordova, Alaska 99574-0020

February 27, 2026

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: Cordova Electric Cooperative (CEC) Opposition to Alaska Board of Fisheries Proposals 170, 171, 172

Alaska Board of Fisheries Members:

CEC strongly opposes Proposals 170, 171, and 172 in favor of science-based management of Alaska's hatcheries and indeed of Alaska's fisheries in general. At a time when many of Alaska's salmon runs are suffering reduced numbers and reduced average size, replacing science-based management with popular opinion influenced by publicity campaigns will exacerbate fisheries management challenges, not alleviate them. Others will likely testify to science and management, and I want to instead underscore the economic and community impacts for those relying on hatchery production.

Alaska is facing new pressure on Alaska salmon markets including the expansion of hatchery production in Asia, Canada, and the Pacific Northwest of the United States. Reducing or compromising Alaska's hatchery production in response places an outsized economic burden on Alaskan communities and hundreds of small-boat, family-based fishermen even if the perceived impacts to salmon can be related to hatchery production. This feels like responding to global hatchery production by punishing Alaskan fisheries.

As Prince William Sound hatchery production struggles with small returns just like the wild stocks, reducing production creates cascading community impacts. CEC relies on fish processing as a key purchaser of energy in the community. When seafood processing is restricted by hatchery reductions, the energy rate base is eroded and CEC is forced to increase rates on the rest of the community, including the fisherman who are already being restricted access to common property hatchery stocks for income. This also impacts regional communities in Prince William Sound, particularly Anchorage which is a major processor and shipper of PWS seafood.

Please refer to historical data on wild stock and hatchery stock returns and their coincidence and consider what has changed over time for impacting salmon stocks including habitat loss on watersheds, predation, climate change, and food chain inputs to salmon stocks before attributing declining stocks to theoretical hatchery stock releases. Please oppose Proposals 170, 171, and 172 until there is strong scientific support for measures that will clearly hurt Alaska communities and commercial fishermen. There may be potential for in-river egg rearing and other hatchery-related activities to help restore other in-river fisheries and it would be a shame to unreasonably target what could be one of the potential solutions to declining salmon stocks around the state.

Respectfully,

Clay Koplin, CEO, Cordova Electric Cooperative

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Raymond Cory Harris, and I am a commercial fisherman in the State of Alaska and have been since 1981. I began as a deckhand on various vessels in 1981, purchased a Prince William Sound permit in 1995, and purchased my own vessel in 2007. I currently own the F/V Tribute and fish Prince William Sound and longline fisheries across state waters. I operate through C & K Fisheries, LLC and have worked with processors including Silver Bay Seafoods, Resurrection Bay Seafoods, and Yakutat Fisheries.

Everything I own or owe is based on my fishing income. I purchased my permit and vessel as an investment for my family. I believe any reduction in hatchery production would upset the broader Alaska and federal economy. The investments in our fisheries would be depleted along with the jobs those fisheries create, and communities like Valdez would suffer severe economic consequences.

The trickle-down effect would be catastrophic to many sectors beyond fishermen, including cannery workers, buyers, sellers, marketers, retailers, grocery stores, fuel companies, welders, net workers, and many more. Many fishermen and corporations could face bankruptcy if these proposals move forward.

I am also concerned that reducing Alaska production could increase reliance on farmed fisheries from other countries, rather than supporting Alaska-caught salmon. I believe the voices of the majority of Alaskans who depend on these fisheries should carry significant weight in this decision.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link

between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Raymond Cory Harris  
Seward, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Costello, and I am a commercial fisherman and small business owner based in the United States of America. I operate Cape Cleare Inc.

Reduced hatchery production would definitely cut down on harvest rates and income stability. It would also reduce access to fish and make operational planning more difficult. The fleet as a whole would suffer because some boats are smaller and cannot travel around Kodiak to fish many areas, and the hatchery provides needed opportunity close to where the fleet operates.

Hatcheries also create jobs through spawning operations and fish rearing work. Reduced production would mean less processing of fish and ripple effects to businesses across communities. These proposals would lead to fewer openers and fewer fish on fishing grounds where much of the fleet depends on consistent access.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Chairman Marit Carlson-Van Dort, and members of the Board of Fisheries,

Thank you for your commitment and work toward maintaining the sustainability and broad-based harvest opportunities of Alaska's precious fishery resources.

I have lived in the Mat-Su Valley drainage of Northern Cook Inlet since 1971 — and have fished this area starting in 1971 on an annual basis. I support and wrote Proposal 186 — which would adjust the Central District Drift Gillnet Fishery Management Plan in a precautionary manner, so use of this plan better matches the Board-adopted purpose language. More specifically, so actions within the plan are real tools for meeting Northern Cook Inlet salmon sustainable escapement goals (SEGs) and avoid over harvesting the Alaska Department of Fish and Game's (ADF&G's) primary coho abundance indicator stocks — before they reach Northern Cook Inlet.

My extended family including father, mother, brothers, sister, nieces, and nephews (more than 20 Alaska residents) have all fished in the Mat-Su Valley, where in the past we often caught most of our annual fish supply. Ocean-run salmon (specifically Chinook and coho) provided most of that harvest. During the past three years there has been zero opportunity to target / harvest wild Chinook in either the entire Susitna River drainage or Little Susitna River, and Chinook salmon spawning escapements have been so low in these systems, that it appears there will likely be no inriver harvest opportunity on any of these wild stocks for the next several years.

Although there has been opportunity to harvest wild coho salmon in Mat-Su Valley sport fisheries, the past three years of returns to historically strong coho salmon producing systems — Deshka River and Little Susitna River — show both of ADF&G's primary indicator stocks for coho abundance throughout Northern Cook Inlet may soon warrant Stock of Management Concern status. To avoid that designation, coho salmon spawning escapement levels need to be significantly increased — to both drainages, and during the 2026 season. Each of these stocks is currently one season (2026) from meeting the criteria for "Chronic" failure to attain escapement goals throughout an entire coho salmon lifecycle. With 3 consecutive years where neither river was positively assessed for attaining a coho salmon SEG, it appears logical that both Deshka and Little Susitna River coho salmon returns may be depressed several years into the future. Therefore, I greatly appreciate Board member's willingness to consider this conservation issue out of cycle, in hopes that Board-adopted amendment(s) will ensure more consistent attainment of Deshka River and Little Susitna River coho salmon SEGs starting in 2026.

Please aim to sustain ADF&G's primary Northern Cook Inlet coho salmon abundance indicator stocks, with purpose-oriented regulation to achieve coho SEGs, in a manner that should also provide reasonable coho salmon harvest opportunities for all user groups, throughout entire fishing seasons.

Thank you, again, for your willingness to work with Proposal 186 in 2026. I am also supporting several additional proposals (checked below) which I believe should better

sustain Alaska's precious fishery resources and harvest opportunities for a broad base of Alaskans and user groups.

**Submitted by:** Glenn Crocetti

**Community of Residence:** Kodiak

With regard to proposals 166,167, and 168, I would like to express my strong support. There is absolutely no reason for any vessel engaged in the Pacific cod Jig fishery to have any other gear type on board the vessel such as, but not limited to slinky pots and longline reels. Jigging is done with a few hooks, a jig machine, and the blood and sweat of the captain and crew. allowing the incongruent behaviors of certain members of the fleet should not stand. Quota landed under a jig permit should be harvested within the legal parameters of the fishery.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Glenn Crocetti, and I am a Kodiak commercial fisherman and permit holder. I fish aboard the F/V Alpha Centauri through Maranatha Fisheries LLC.

Any reduced harvest opportunity would have a negative effect on communities statewide across multiple businesses and sectors. It would also mean less tax revenue for the State of Alaska in the form of landing taxes.

I am concerned these proposals would set a harmful precedent and disincentivize future generations of aspiring commercial fishermen from entering and investing in Alaska fisheries.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,



**Submitted by:** Alan Crookston

**Community of Residence:** Kenai

Dear Chairman and Members of the Alaska Board of Fisheries,

I am writing to formally state my strong opposition to Proposal 175, which seeks to modify dip net mesh sizes and alter the regulations regarding extension ropes. After reviewing the proposal, it is clear that these modifications pose severe safety risks, demand extreme physical exertion, create a massive financial burden, and are biologically unnecessary.

A critical factor completely overlooked in this proposal is safety and gear recovery. The tides in Cook Inlet, particularly in the upper inlet, are some of the strongest in the world. The sheer force of the current has already caused me to lose multiple dip nets overboard. Extension ropes are a vital safety mechanism that allows us to actually recover our gear when it inevitably gets ripped overboard in these strong tides. Removing or restricting this ability will lead to permanent gear loss and dangerous situations on the water.

Furthermore, holding onto a dip net against the relentless, all-day flow of the tide is extraordinarily fatiguing. I am 45 years old and healthy, yet the immense physical toll of battling these currents resulted in tendinitis in both of my elbows after just one season. Altering the gear requirements will only exacerbate the physical strain and safety hazards in what are already treacherous, exhausting waters.

Additionally, if passed, this regulation would require me to replace all of my existing gear and meshes, which would cost thousands of dollars out of pocket. This extreme financial burden is entirely unjustified by the data. Catch records from recent years demonstrate that our current methods have essentially zero impact on King Salmon. To put it simply: if it ain't broke, don't fix it.

For these reasons—the undeniable safety hazards, the loss of ability to safely recover gear in heavy currents, the extreme physical fatigue, the unnecessary financial hardship, and the lack of conservation necessity regarding kings—I strongly urge you to reject Proposal 175 and maintain the current regulations.

Thank you for your time and consideration of my comments.

Sincerely,

Alan Crookston

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**Submitted by:** Luke Crookston

**Community of Residence:** Kenai

Please oppose prop. 175. As a teenager, it is extremely difficult to hold a dipnet in the tides of Cook Inlet, and during slack tide (when the current backs off), the fishing is really poor. In two seasons of commercial dipnetting, we have not harvested one king salmon.

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**Submitted by:** Nina Crookston  
 Tide Chaser Fishery  
**Community of Residence:** Kenai

Dear Chairman and Members of the Alaska Board of Fisheries,

My name is Nina Crookston, and alongside my husband, we operate Tide Chaser Fishery in the Upper Cook Inlet. I am writing to strongly urge you to reject Proposal 175.

This proposal is not just impractical; it is a direct threat to the safety of our operation. Many of our crew members are younger—including our own teenage boys—and the physical demands of this fishery are already immense. The currents out in the open inlet are vastly stronger and more unforgiving than anything experienced on shore or in the river. Before we began utilizing tether ropes, the sheer force of the tide ripped several dipnets right out of our hands and over the side of the boat. Restricting our ability to tether and secure our gear safely puts our crew at risk.

Furthermore, the financial expectation this proposal places on fishing families is unreasonable. We recently spent nearly \$20,000 just to get set up to fish with commercial dipnets. Forcing us to scrap that massive investment in buying entirely new gear is an unnecessary modification to an almost dead fishery.

Please consider the safety of our younger crew members and the severe, unjustified financial burden this places on us. Vote no on Proposal 175.

Sincerely,

Nina Crookston

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**Submitted by:** Ted Crookston  
**Community of Residence:** Kenai

Dear Chairman and Members of the Alaska Board of Fisheries,

I have been fishing these waters for decades, and I am writing to tell you flat out that Proposal 175 is a terrible idea that needs to be rejected.

Unless you've been out in the upper Cook Inlet trying to hold a dip net against a ripping, offshore tide, you cannot understand the physical toll it takes. The currents out in the inlet are a whole different beast compared to standing on the shore or fishing in the river. You try holding a net in that rushing water all day at my age. It tears up your joints, drains every ounce of strength you have, and is downright dangerous.

The tether ropes are the only things keeping our gear—and sometimes us—in the boat. Before we used them, I watched the sheer force of that water snatch nets right out of my hands and pull them over the side. Taking away or restricting our ability to secure these nets isn't just an inconvenience; it's a massive safety hazard for those of us who don't have the shoulders and back of a 20-year-old anymore.

On top of the safety issues, expecting us to throw out perfectly good meshes and drop thousands of dollars on new gear for a fishery that is practically on life support makes no sense. The catch records show we aren't the ones hurting the kings.

Stop trying to fix things that aren't broken, and please consider the safety and livelihoods of the older fishermen who have dedicated their lives to this inlet. Vote NO on Proposal 175.

Sincerely,

Ted Crookston

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**Submitted by:** Todd Crookston

**Community of Residence:** Kenai

Please oppose proposal 175, or my family will not be able to fish at all.

---

**Submitted by:** Wesley Crookston

Wild Salmon Ranch, LLC

**Community of Residence:** Kenai

Please oppose prop 175.

We have already been reduced from 9 setnets to a handful of dipnets; this is an astronomical reduction of gear for our fishery. This prop is designed to kick us while we are down, nothing more. There is no biological basis for this, and not having a rope tied to your dipnet while out in Cook Inlet would be like riding in a car without wearing a seatbelt. Not safe, and not a good idea.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Bernard Culbertson, and I am a commercial fisherman based in Valdez, Alaska. I fish aboard the F/V NINKASI. I fished Prince William Sound in the 1970s when some years there was not even a purse seine season, or, as in 1978, only Valdez Arm was open for the entire season. Hatcheries were started to make fishing viable, and I have seen firsthand how important they have been.

I live and fish out of Valdez, and this is my only income. The stability of hatchery returns is what makes it possible for me to support my family.

For Valdez, the loss of property taxes, fish taxes, and wages to employees would be devastating. The processors in the greater Prince William Sound area are major economic drivers to each community.

It is well documented that having the hatcheries takes pressure off wild stocks throughout Prince William Sound. Every time you reduce one thing, it only adds more pressure to the wild stocks in our area.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Bernard Culbertson  
Valdez, Alaska



PC134

**Submitted by:** Richard Curran  
**Community of Residence:** Sitka

I support proposals 163 and 164. I am opposed to on bottom trawling because of damage it causes to the Seafloor and Essential Marine Habitat that Halibut and other depleted Species depend on.

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PC134

**Submitted by:** Richard Curran  
**Community of Residence:** Sitka

Proposals 11,163-165. SUPPORT. I support regulations that remove trawls from the Bottom and protect important Habitat. Eliminating trawl bottom contact will also reduce Halibut bycatch when the Halibut stocks are at Historic Lows. Most Coastal Alaska towns are feeling the effects of low Halibut stocks. Reducing Halibut bycatch will help.

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PC134

**Submitted by:** Richard Curran  
**Community of Residence:** Sitka

Proposals 176and 177. I OPPOSE These proposals. These proposals would make it difficult for Charter/Non Resident anglers to stay within Allocations in Southeast Alaska.

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PC134

**Submitted by:** Richard Curran  
**Community of Residence:** Sitka

Proposal 187. OPPOSE. This can be an Important fishery for Yakutat fishermen. Yakutat has few economic opportunities and cannot afford to be shutout from traditional fishing grounds.

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PC135

**Submitted by:** Adam Cuthriell  
FishHound Expeditions  
**Community of Residence:** Girdwood

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.

Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.

Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

Sincerely,

Adam Cuthriell

FishHound Expeditions

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## Comment on Proposals 170, 171 and 172

I am strongly opposed to the implementation of proposals 170, 171 and 172 that seek to reduce or remove hatcheries from Alaskan waters. Hatcheries are a vital component of the states salmon fisheries and without them, the industry and way of life that comes with it would be severely damaged.

I have spent my entire adult life fishing as a Prince William Sound gillnetter. The Sound is such a unique and incredible place to fish. I fell in love with the fishery the first year I arrived and continue to count myself incredibly fortunate to participate to this day. The hatcheries are what allow it to be a truly viable livelihood. Without them, the cost to benefit of participating in the PWS fisheries would become nearly untenable. This is particularly true given the cyclical nature of the natural salmon runs and the natural ebb and flow of quantity. On a season in which the Copper River is closed for long durations the gillnet fleet would be almost entirely sidelined.

There are several problems with managing a fishery to allow for only intermittent catch. First, there has been very significant amount of capital expenditure towards the PWS fisheries, and this spending has been based on expected production from the hatcheries. Without hatchery fish a massive percentage of the fleet would both lose the ability to make money fishing, and at the same time they would lose the value of their boats and permits. This would financially ruin many of these people, most of whom live in coastal Alaskan communities. Secondly, when a fishery is often unprofitable, it becomes almost impossible to run a cannery to provide service to the fishermen. These canneries provide a large amount jobs and revenue to coastal communities, and their loss would be felt drastically. Finally, without consistent tender coverage it becomes harder for ADF&G to manage wild runs and makes them susceptible to over escapement.

Alaska's hatcheries have a long track record of success, and have been huge benefits to both Alaskans, and the people who consume the salmon we produce. The world needs more healthy fish, and Alaska needs the fisheries. A blanket reduction of egg release would cause acute and serious damage to the people and communities of Alaska. Please vote no on these proposals and let us keep our lifestyle.



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Henry Dera. I am a commercial salmon seine permit holder and operator in the Kodiak management area and fish aboard the F/V Arielle Rose.

If adopted, these proposals would directly reduce a resource that provides a significant portion of my catch and income. Reduced opportunity at the hatchery would divert effort elsewhere and can increase pressure on wild stocks due to displaced fishing effort.

Reduced harvest opportunity would negatively affect commercial fishermen at a time when margins are extremely tight. Commercial salmon fishing is the backbone of many coastal communities, and the ripple effects of reduced viability would be felt by local businesses that support our fleet. Hatchery salmon are also an important piece of Alaska's food security.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Henry Dera  
Kodiak, Alaska



**Submitted by:** Brandon Darr

**Community of Residence:** Kenai, Alaska

Feb. 2026

Dear Alaska Board of Fisheries,

I oppose proposal 170.

A 25% reduction of egg take at all pink and chum hatcheries state wide would mean economic disaster for the Fishermen and Fishing Communities across the state of Alaska. Most of the salmon fry that are released from hatcheries quickly become food for birds, other fish and marine mammals. Only a small percentage (approx. 2% - 5%) of eggs fertilized at hatcheries return as mature fish. The sustained reduction of egg take at these hatcheries would negatively impact many communities of the State and many families for years to come. Similar proposals have not been passed by the board in the past due to lack of evidence there is a correlation between hatchery production and wild fish. The massive red runs in Bristol Bay over the past decade and record runs in the Kenai river recently are proof that there is no correlation. Alaskans need jobs, our communities need revenue and for those reasons I oppose proposal 170.

I oppose proposal 171.

Any reduction of pink salmon egg take at hatcheries in Prince William Sound would mean economic disaster for the Fishermen and Communities of the Area. Most of the salmon fry that are released from hatcheries quickly become food for birds, other fish and marine mammals. Only a small percentage (approx. 2% - 5%) of eggs fertilized at hatcheries return as mature fish. An unknown or any reduction of egg take at these hatcheries would negatively impact the area and so many families for years to come.

I oppose proposal 172.

Placing a moratorium on pink and chum hatcheries is a drastic and unnecessary measure. If hatcheries and hatchery fish were so bad, why wouldn't the proposal call for a moratorium on all salmon species. This proposal is the product of a bias and skewed agenda. The scientific studies cited in it as evidence are twisted to meet that agenda. Alaskans need job, my family like many others here rely on hatchery salmon, along with wild salmon, to make a living and feed our families. Our communities rely on revenue generated by those catches to fund their budgets. I oppose proposal 172.

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**Submitted by:** Winston Davies

**Community of Residence:** Wrangell

Bottom trawling for any sort of fish needs to be banned, or at the very least severely curtailed everywhere around Alaska, certainly within the 3 mile zone. Small boat shrimp trawlers should not be lumped into this ban. This is in regard to proposals 11, 163, 164, 165

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March 2, 2026

Dear Members of the Board of Fisheries:

My name is Jason Davis. I am a lifelong commercial fisherman and Alaska resident. I have fished in Prince William Sound in both seine and gillnet fisheries for over 20 years. I own the F/V Tsiu and my son owns the F/V Done Deal.

Hatcheries sustain our Prince William Sound fisheries and take pressure off wild runs while supporting a fleet built around enhanced production for decades. With rising hatchery production costs, a 25 percent reduction would eliminate much of the common property fish we depend on.

Reduced production would mean fewer processing jobs, loss of economic stability, reduced food availability, and ripple effects across communities and tribal members who depend on these fisheries.

Climate change, ocean warming, predation, and other fisheries also impact returns. A production reduction will negatively affect both fishermen and wild stocks by increasing pressure elsewhere.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

**Submitted by:** Stephen Day  
F/V Wren

**Community of Residence:** Anchorage

I own and operate a gillnet boat and permit in Prince William Sound and have since 2018. I love this way of life, and consider myself privileged to be able to earn my living catching salmon in our pristine waters. This way of life feels threatened from many directions; climate change, market volatility, increased expenses, and unreliable returns. In the time that I've been fishing the hatchery returns we've had access to have provided a reliable source of salmon when wild runs have fluctuated. This was why I bought into this fishery, there was a system of diversification instituted by the state that ensured a higher likelihood of having a profitable season. I feel it is incumbent upon the state to ensure that those of us that rely on this system are accounted for.

If the hatchery system is gutted, as these proposals aim to do, then we will be left holding the bag, as it were. And all with no guarantee of the desired effect. These are high stakes proposals that impact thousands of Alaskans livelihood and should be considered only under the most rigorous scientific scrutiny. The burden of proof is on the proposers. Are hatchery salmon actually to blame for decline of wild runs? Or is it so many factors like climate change and changing ocean environment, unregulated open ocean fishing, foreign hatcheries and fishing practices? And if these proposals are adopted, I believe we are owed recompense. The state created this style of fishing income and I believe it is responsible to continue it or replace it. We as Alaskans need this industry and this food source.

Please weigh this decision with that in mind.

I oppose proposals 170, 171, and 172

I also support proposals 175 and 180

Limiting gear size and type to decrease unintended Chinook mortality is an easy way to increase survivability.

And limiting sport catch makes sense.

Primarily building a system for in season sport caught Chinook reporting is imperative. As a commercial fisherman our catch reporting is quite timely, as we are motivated to get our catch to market as soon as possible. The more data the better.

**Submitted by:** Stuart Deal

**Community of Residence:** Cordova

Proposals 170, 171 and 172 have the ring of science, but no. The findings sited by those proposing cuts to egg permits are presented in a conclusive way as if other factors in the ocean are do not have negative effects. Wild stocks of pink salmon in Prince William Sound thrive alongside hatchery fish. The harvest of sockeye salmon in Cook Inlet was very strong last year and is expected to be strong again this coming year. Sport fishing interests are constantly pushing aside commercial fishing interests. From Maine to the Gulf of Mexico, and up the west coast, small boat fishermen are marginalized. Not Alaska too.

I DO NOT SUPPORT THESE PROPOSALS

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Gig Decker, and I live in Wrangell, Alaska. I have commercially fished for 51 years and participated in dozens of fisheries across the state, including drift gillnetting for all 51 years. For the last 40 years, I have owned a drift gillnet operation in Southeast Alaska. I am also a subsistence user and sport fisherman. I have lived in Wrangell for more than 40 years and raised my family fishing with me on the F/V McCrea.

In years when hatchery chum returns are strong, the majority of my gillnet gross revenues come from hatchery chum. When chum runs are lower, about 25% of my revenue still comes from hatchery chums. This has changed over time as wild king and sockeye runs have not been as strong. This is exactly what the salmon enhancement program is supposed to do.

Wrangell would definitely see a hit to its economy if 25% of chum hatchery releases were reduced. Local fishermen would have less to spend on boat maintenance in the boat yard and hardware stores, and the community would see less fisheries business tax revenue returned locally.

Approximately 2–3% of hatchery salmon fry released return to be harvested. The remaining 97–98% are eaten by predators—either just after release (including humpback whales that have learned to target release sites) or when adults return (including seals and sea lions, whose populations are increasing in many parts of the state). People assume negative impacts of hatchery salmon in the open ocean, but the reality is that we do not know. And an assumption that hatchery salmon are helping the open-ocean environment is just as plausible given what we know at this time.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address.

Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Gig Decker  
Wrangell, Alaska



## COMMENTS IN SUPPORT OF PROPOSALS 170, 171, AND 172

**Submitted by:** Abigail A. Dodd

**Date:** March 2, 2026

**Hometowns:** Seldovia and Anchorage, Alaska

### Introduction

I support Proposals 170, 171, and 172 because each advances the Board’s constitutional obligations under Article VIII of the Alaska Constitution to manage wild salmon pursuant to the sustained yield principle and the state’s constitutional public trust obligations to protect wild-origin salmon for the benefit of the people of Alaska and future generations. Proposal 172 is the most constitutionally sound course. By placing a moratorium on further increases in pink and chum salmon egg take, it ensures that the Alaska Department of Fish and Game (ADF&G) and the Board of Fisheries do not authorize additional expansion of artificial production while substantial scientific uncertainty remains regarding hatchery–wild genetic introgression, reduced relative reproductive fitness, loss of portfolio diversity, and marine ecosystem competition. The Alaska Supreme Court has made clear that agencies must apply the best available science and take a “hard look” at all factors material to sustained yield. That duty includes consideration of peer-reviewed genetic studies, hatchery stray-rate data, and marine competition research. Where credible evidence demonstrates measurable risk to wild stocks, the sustained yield clause requires precaution—not expansion.

If the Board declines to adopt Proposal 172, then Proposals 171 and 170 should be adopted together as a constitutionally necessary second-best alternative. Proposal 171 enforces existing stray-rate limits contained in the Prince William Sound/Copper River Comprehensive Salmon Plan, bringing hatchery operations back into compliance with established conservation standards. Proposal 170 reduces statewide egg take levels, thereby lowering cumulative genetic and ecological pressure on wild stocks. Acting in conjunction, these proposals would better satisfy ADF&G’s constitutional duty to apply best available science, to prevent adverse impacts from artificial propagation, and to conserve the wild salmon resource as the trust corpus for present and future generations.

### Background

In Article VIII’s “common use” and “sustained yield” clauses, the framers of Alaska’s constitution made the State a trustee obligated to preserve wild fish for the “maximum benefit” of the people. ALASKA CONST. art. VIII, § 3. (establishing the “common use clause,” which provides that “wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”); ALASKA CONST. art. VIII, § 4. (establishing the “sustained yield clause,” which announces that “fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle.”). Alaska courts have repeatedly recognized these public-trust duties. *Owsichek v. State, Guide Licensing & Control Bd.*, 763 P.2d 488, 495 (Alaska 1988) (concluding that the Alaska constitution “impos[es] upon the state a trust duty to manage the fish,

wildlife, and water resources of the state for the benefit of all the people.”); Pullen v. Ulmer, 923 P.2d 54, 60 (Alaska 1996) (explaining that “common law principles incorporated in the common use clause impose upon the state a trust duty to manage the fish, wildlife and water resources of the state for the benefit of all the people.”); Metlakatla Indian Community, Annette Island Reserve v. Egan, 362 P.2d 901, 915 (Alaska 1961) aff’d 369 U.S. 45, 82 S. Ct. 552, 7 L. Ed. 2d 562 (1962); Pullen v. Ulmer, 923 P.2d 54, 60 (Alaska 1996).

Yet the State’s hatchery apparatus—scaled up in the 1970s to overcome past depletion—now risks permanently altering the genetic and ecological foundations of wild populations. Recent empirical scientific studies conducted by Alaskan biologists show that hatchery strays can demographically “boost” wild abundance while eroding genetic diversity and reducing relative fitness. *See, e.g.,* \*\*Ingerid J. Hagen et al., *Evaluation of Genetic Effects on Wild Salmon Populations from Stock Enhancement*, 78 \*\*\*\*ICES J. Marine Sci. \*\*900 (2021) (providing empirical evidence that high hatchery contribution on spawning grounds reduces the recipient population’s effective genetic diversity, with the mechanism and strength of effect quantified across cohorts); \*\*Samuel A. May et al., *Salmon Hatchery Strays Can Demographically Boost Wild Populations at the Cost of Diversity: Quantitative Genetic Modelling of Alaska Pink Salmon*, *Royal Soc’y Open Sci.*, July 2024, at 13 (a multi-generational study of hatchery–wild interactions showing loss of phenotypic variation from hatchery-origin pinks on wild populations). *See generally* Kyle R. Shedd et al., *Reduced Relative Fitness in Hatchery-Origin Pink Salmon in Two Streams in Prince William Sound, Alaska*, \*\*15 *Evolutionary Applications* 429 (2022) (discussing reduced fitness of hatchery-origin pinks in Prince William Sound). When the State aggregates harvest or escapement without disaggregating hatchery from wild, it mistakes production for preservation, creating an illusion of abundance.

The sustained-yield clause must be enforced as a fiduciary duty that extends to hatchery decisions. The Board of Fisheries must treat hatchery permitting, releases, and straying controls as trust actions subject to a “hard look” based on scientific, ecological and genetic considerations. Alaska should cease calling these projects “enhancement” and recognize them for what they are: experimental ocean ranching requiring strict trust-consistent oversight. Statutes, regulations, and agency publications should stop describing hatcheries as “enhancement” and adopt the more accurate term “experimental ocean ranching.” This semantic shift re-centers the legal baseline on wild salmon and frames hatchery operations as potentially impairing activities that carry burdens of proof, monitoring, and mitigation. Within its existing authority, the Board of Fisheries must implement trust-consistent reforms by exercising its regulatory and advisory powers to ensure science-based management plans distinguish wild from hatchery influences on stocks. All three of these proposals represent lawful, precautionary exercises of the Board’s authority that would bring hatchery operations into closer alignment with Article VIII’s sustained-yield mandate by reducing genetic and ecological risk to wild stocks and reaffirming the State’s fiduciary duty to conserve wild salmon as the enduring trust resource of the people of Alaska.

## **Proposal 170 — SUPPORT**

**Reduce the permitted egg take level of each hatchery permit containing pink and chum salmon by 25% of current permitted capacity.**



I support Proposal 170 because it represents a constitutionally grounded, scientifically justified, and precautionary response to the documented risks that large-scale hatchery production poses to Alaska's wild salmon stocks.

Article VIII of the Alaska Constitution reserves fish “in their natural state” to the people for common use and mandates that replenishable resources be “utilized, developed, and maintained on the sustained yield principle.” Alaska Const. art. VIII, § 3 (establishing the “common use” clause, which provides that “[w]herever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use”).

The Alaska Supreme Court has repeatedly interpreted these clauses as imposing fiduciary obligations on the State to conserve fishery resources for present and future generations. In *Owsichuk v. State* and *Pullen v. Ulmer*, the Court recognized that Alaska holds fish and wildlife in trust. In *Native Village of Elim v. State*, the Court clarified that sustained yield does not require mechanical numerical precision but does require that agencies engage in reasoned, science-based decision-making grounded in the best available information. When Article VIII decisions are challenged, courts apply the “hard look” doctrine to ensure that agencies have genuinely considered all factors material to the public interest.

That framework applies equally to hatchery production decisions. Hatchery egg-take levels are not merely operational details; they are trust actions that directly affect the genetic composition, productivity, and long-term resilience of wild salmon populations. The Board is required under the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222) to protect wild stocks from adverse impacts of artificial propagation and to apply a precautionary approach in the face of uncertainty. Where the impact of resource use is uncertain but presents a measurable risk to sustained yield, priority must be given to conserving the productive capacity of the resource. Sustainable Salmon Policy, ALASKA ADMIN. CODE tit. 5, § 39.222(d) (2025) (“The principles and criteria for sustainable salmon fisheries shall be applied, by the department and the board using the best available information . . . .”); ALASKA STAT. § 16.05.251 (2024) (establishing the framework for the Board of Fisheries to adopt regulations).

The scientific record now demonstrates that those risks are not speculative. A comprehensive global review of peer-reviewed literature evaluating hatchery impacts on wild salmonids found that 83% of studies reported adverse or minimally adverse effects on wild populations, most commonly through genetic diversity loss, reduced productivity, and ecological competition. Only 3% reported beneficial effects, and nearly all of those were confined to tightly controlled recovery contexts for highly depleted stocks—not large-scale ocean ranching systems. In Alaska, recent peer-reviewed studies parameterized specifically to Prince William Sound pink salmon have shown that hatchery-origin strays can artificially inflate abundance while eroding phenotypic variation and genetic diversity in wild populations.

\*\*Samuel A. May et al., *Salmon Hatchery Strays Can Demographically Boost Wild Populations at the Cost of Diversity: Quantitative Genetic Modelling of Alaska Pink Salmon*, Royal Soc’y Open Sci., July 2024, at 13 (a multi-generational study of hatchery–wild interactions showing loss of phenotypic variation from hatchery-origin pinks on wild populations). Field studies have documented reduced relative reproductive success of hatchery-origin pink salmon in Prince William Sound streams, meaning that straying does not simply supplement wild production; it can alter population fitness trajectories. See generally Kyle R. Shedd et al., *Reduced Relative Fitness in Hatchery-Origin Pink Salmon in Two Streams in Prince William Sound, Alaska*, \*\*15 *Evolutionary Applications* 429 (2022) (discussing reduced fitness

of hatchery-origin pinks in Prince William Sound). Additional work has demonstrated competitive effects in the marine environment, including reduced growth of sockeye salmon during years of high pink salmon abundance.

Reducing permitted egg take by 25% is not a ban on hatcheries. It is a moderate, precautionary recalibration of production levels in light of mounting evidence that current scales of artificial propagation may exceed ecological thresholds. The sustained yield clause cannot be reduced to a simple tally of aggregate harvest. Yield must be sustained in the wild resource itself—in its genetic diversity, portfolio structure, and ecological function. A 25% reduction provides a margin of safety while preserving the hatchery program. It is a lawful and proportionate exercise of the Board's authority under AS 16.05.251 and AS 16.10.440 to regulate the number and source of salmon eggs in furtherance of conservation.

For these reasons, the Board should adopt Proposal 170.

## **Proposal 171 — SUPPORT**

**Require changes in Prince William Sound pink salmon hatchery production sufficient to reduce straying into Lower Cook Inlet streams to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan.**

I support Proposal 171 because it enforces an existing management standard and aligns hatchery operations with both the Comprehensive Salmon Plan and the State's constitutional trust obligations.

The Prince William Sound/Copper River Comprehensive Salmon Plan specifies that the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of wild-stock escapement over the long term. Yet empirical sampling in Lower Cook Inlet streams has documented hatchery-origin pink salmon proportions averaging 22% from Prince William Sound facilities alone, and 34% when combined with local hatchery contributions. These levels exceed plan thresholds by an order of magnitude.

Alaska's "hard look" doctrine requires agencies to consider relevant factors, disclose reasoning, and act conservatively under uncertainty. *Hammond v. N. Slope Borough*, 645 P.2d 750, 759 (Alaska 1982) (citing *Kleppe v. Sierra Club*\*, 427 U.S. 390, 410 n.21(1976)); \*see also\* *Kachemak Bay Conservation Soc'y v. State*, 6 P.3d 270, 275 (Alaska 2000) ("[O]ur duty is to ensure that DNR has taken a hard look at the salient problems and has genuinely engaged in reasoned decision making.") (internal quotations omitted).

The Alaska Supreme Court has upheld closures of the fishing season without perfect data where declining runs and best-available science support precautionary action. *Sitka Tribe of Alaska v. State*, 540 P.3d 893, 895 (Alaska 2023) (holding that the Alaska Department of Fish and Game's decision to not provide a scientific report to the Board of Fisheries as it considered closure of a commercial herring fishery was not arbitrary as it was a highly technical report mostly concerned with computer coding fixes to the biomass forecasting program). That same logic should apply to hatcheries: managers need not await for irrefutable proof of genetic harm before imposing caps on releases, pHOS (proportion hatchery-origin spawners) limits, and stray-rate thresholds, accompanied by monitoring and automatic corrective triggers.

Straying at such levels is not a technical irregularity. It is a structural alteration of wild population composition. The Alaska Hatchery Research Project and independent peer-reviewed studies have demonstrated that hatchery-origin pink salmon exhibit reduced relative reproductive fitness in natural spawning environments. Kyle R. Shedd et al., *Reduced Relative Fitness in Hatchery-Origin Pink Salmon in Two Streams in Prince William Sound, Alaska*, \*\*15 Evolutionary Applications 429 (2022) (discussing reduced fitness of hatchery-origin pinks in Prince William Sound). Quantitative genetic modeling shows that sustained introgression can reduce genetic variation and increase synchrony among populations, thereby weakening the portfolio effect that buffers Alaska’s fisheries against environmental variability. \*\*Samuel A. May et al., *Salmon Hatchery Strays Can Demographically Boost Wild Populations at the Cost of Diversity: Quantitative Genetic Modelling of Alaska Pink Salmon*, Royal Soc’y Open Sci., July 2024, at 13 (a multi-generational study of hatchery–wild interactions showing loss of phenotypic variation from hatchery-origin pinks on wild populations). When hatchery-origin fish compose 20% or more of spawners in wild systems, the risk of long-term homogenization and resilience loss is substantial.

Under the Sustainable Salmon Policy, artificial propagation must not adversely affect natural stocks, and managers are required to act conservatively in the face of uncertainty. The Alaska Supreme Court’s “hard look” jurisprudence reinforces that agencies must consider all factors material to sustained yield. Stray rates far exceeding plan criteria are plainly material. The Board possesses explicit authority to amend permit terms relating to egg numbers and production conditions under AS 16.10.440(b). Where documented stray rates violate comprehensive plan standards, corrective action is not discretionary; it is required to maintain trust compliance.

Proposal 171 does not impose a novel standard. It requires adherence to the Board’s own adopted criteria. Enforcing those criteria strengthens regulatory integrity, protects wild population structure, and fulfills the Board’s fiduciary responsibilities under Article VIII.

For these reasons, the Board should adopt Proposal 171.

## **Proposal 172 — SUPPORT**

### **Adopt a moratorium on increases in pink and chum hatchery egg take relative to permitted levels as of 2025.**

I support Proposal 172 because a moratorium on expansion is the minimum precautionary measure consistent with current scientific uncertainty and the Board’s constitutional duties.

As previously explained, recent research has associated large pink salmon abundances—including hatchery-origin fish—with altered marine ecosystem dynamics and reduced growth or productivity of other salmon species. Widespread declines in Chinook and chum productivity across Alaska have occurred during a period of elevated hatchery pink production, raising legitimate questions about marine carrying capacity and interspecific competition. While causation in complex marine systems is difficult to isolate, the precautionary approach codified in 5 AAC 39.222 does not require absolute proof of harm before action is taken. It requires conservative management where measurable risk exists.

The Sustainable Salmon Policy explicitly directs that corrective measures be initiated “without delay” and achieved within approximately one salmon generation—roughly five years. A moratorium on increased egg take allows time for ongoing hatchery research, independent scientific review, and comprehensive policy revision to occur without compounding potential impacts through further expansion. It is a pause, not a rollback.

The Alaska Supreme Court has upheld precautionary fishery restrictions imposed in the face of uncertainty where best available information suggested plausible conservation risks. That principle applies equally here. The Board need not await irreversible genetic or ecological change before acting. Moreover, codifying the current informal restraint reported by the Commissioner provides transparency and regulatory stability. Without formal Board action, expansion could resume without public deliberation.

Under AS 16.05.251(9) and AS 16.10.440(b), the Board has clear authority to regulate the number and source of salmon eggs. Exercising that authority to prevent further expansion during a period of scientific reassessment is consistent with both statutory authority and constitutional fiduciary obligations.

For these reasons, the Board should adopt Proposal 172.

### **Conclusion**

Proposals 170, 171, and 172 are timely and needed to prevent further harm to wild-origin salmon. The three proposals collectively advance a precautionary, science-based framework for aligning hatchery operations with Alaska’s constitutional sustained-yield mandate. The Alaska Constitution does not require the State to maximize artificial production; it requires the State to steward wild salmon as a self-sustaining trust resource. Where credible scientific evidence demonstrates genetic introgression, reduced fitness, ecological competition, and excessive stray rates, the Board must act conservatively. Adoption of these proposals would reflect a reasoned application of the best available science, compliance with existing comprehensive plan standards, and faithful execution of the Board’s fiduciary duties under Article VIII.

Respectfully submitted,

**Abigail A. Dodd**

**Submitted by:** Curt Dodd

**Community of Residence:** Anchorage

170, 171 and 172. I support all but primarily 172. There needs to be a pause and re-evaluation of the impact to our wild stocks. I have lived in Alaska 43 years and spent many days in PWS and Cook Inlet, I am a sport fisherman, and have watched our salmon populations diminish, sadly. For me, this is clearly a lack of focused oversight with too much emphasis on commercial fishing. These wild resources belong to us all and should not be managed as a profit center for a limited few, and many are non-residents. I have read about the effects on wild salmon by hatcheries, and it is terrible. Granted, not all hatcheries are equal, but many are practically ignored in terms of their impact with little study to fully understand what is occurring to our wild stocks. It has been this way for 50 years! There is no science that shows wild salmon are unaffected by hatcheries, but rather mounting evidence of the harm they cause. Let's hit the pause button and figure things out and get it right for the longevity of the species.

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**Submitted by:** Daniel Donich

**Community of Residence:** Homer AK

Proposal support for #176

Hello My name is Daniel Donich I have lived in Homer AK since 1988 and started my guide service in 1992 I have one 6 pack charter boat and I have been involved in the Process for a long time and have been a member of the Homer Charter Association since 1992 proposal 176 is asking for small adjustment to our current regulations that will save a bunch of fish especially in these times of extremely LOW ABUNDANCE when every fish counts. I have seen so many of these proposals come through every cycle and they always get slapped down. Please consider this proposal for the sake of saving fish in especially in Saltwater were many of are rockfish species have air bladders that come up off the bottom with there eyes bulging out and there air bladders poking out of there mouths, one guy has a yellow eye, and another guys a has a Black Rockfish and they have both exceeded their bag limit of those particular species and under current regs we have to release them, and they may or may not live even though we used are deepwater release. So I hope you can understand were I am going with this and I am sure you have if you have ever been out on Alaskan saltwater on a charter boat. I like to call it group fishing as long as everyone in a particular group is in agreement to fish as a group, and no ones bag limit would be exceeded.

Thanks for your consideration.

Daniel Donich

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**JIM DORN, JUNEAU ALASKA,**

**PROPOSAL NO. 170 COMMENTS**

Dear Members of the Alaska Board of Fisheries,

I am **OPPOSED to Proposal No. 170 “Reduce permitted pink and chum salmon egg take levels of each hatchery by 25%”** for the following reasons.

I live in Juneau and am most aware of the positive impact DIPAC’s hatchery chum salmon production has had on supporting king and coho sportfishing in the Juneau area.

**Impact on King and Coho Production at DIPAC.** I have been sport fishing in Juneau for over 50 years, most recently focusing on the shoreside sport fishery for king and coho released by the Douglas Island Pink and Chum (DIPAC) Hatchery. The shoreside sport fishery for both king and coho has generally been very successful since the Douglas Island Pink and Chum (DIPAC) Hatchery started raising and releasing them in the Juneau area. DIPAC’s chum salmon returns pay for DIPAC’s king and coho programs. Cutting chum production at DIPAC would dramatically impact or possibly eliminate their ability to provide sport and subsistence fishing opportunities for king and coho in Juneau.

**DIPAC Chum Salmon Releases not Impacting local hatchery King and Coho returns.** DIPAC releases 120-130 million Chum within 40 miles of their Chinook and Coho release sites. Common sense would suggest the king and coho stocks that would be most negatively impacted by such a chum release would be the king and coho in the Juneau area. Returns for king and coho, as well as for chum, are all doing great in the Juneau area. Each year I regularly observe 50 to 75 boats sport fishing in Fritz Cove between June 15 and August 1 targeting DIPAC’s king salmon returns to the Fish Creek Pond release site. Similar sport fishing efforts occur near the Lena Cove release site and in Gastineau Channel. The chum salmon releases in close proximity to the local hatchery raised king and coho release sites are not negatively impacting the returns of local king and coho to the Juneau area.

In conclusion, I am very concerned that cuts to chum production at DIPAC will have negative consequences on their king and coho program. DIPAC has been in operation for 50 years and the balance between chum, king and coho production has proved successful.

Thank you,

Jim Dorn,

Juneau, Alaska



## **Douglas Island Pink and Chum, Inc.**

2697 Channel Drive • Juneau, Alaska 99801  
(907) 463-5114 • [www.dipac.net](http://www.dipac.net)

Alaska Dept. of Fish and Game  
Alaska Board of Fisheries  
Submitted via online form

February 23, 2026

Chair Carlson-Van Dort, Members of the Alaska Board of Fisheries,

### **RE: DIPAC opposes proposal 170**

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit (PNP) hatchery corporation based out of Juneau, Alaska; founded in 1976. DIPAC currently manages two PNP hatcheries in the Juneau area: Macaulay Salmon Hatchery (MSH, DIPAC owned and operated, built in 1989), and Snettisham Salmon Hatchery (*State owned* and DIPAC operated, built by the State in 1980 and contractually run by DIPAC since 1996). DIPAC also manages the Ladd Macaulay Visitor Center which welcomes visitors from around the world and has been offering free salmon and marine life education to Alaska's school children since 1990. *The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.*

#### **DIPAC Current Salmon Fisheries Enhancement Programs:**

***DIPAC has no intention of increasing chum production & chum production has been stable since the early 1990s. Pink salmon production from DIPAC ceased in 2001. This pink salmon production is no longer on the MSH hatchery permit. The two DIPAC managed hatcheries are maxed out on all salmon production and WILL NOT be requesting to add any capacity in the foreseeable future.***

***DIPAC currently raises Chinook, chum, coho and sockeye salmon. Any reduction in chum salmon production would lead to the likely inability to fund other species programs on an annual basis as ~90% of annual revenue comes from chum salmon cost recovery.***

See map on the last page of this document for current release goals by species (chum salmon release sites have been stable since 1990, sockeye sites have been stable since 1996, additional coho & Chinook production was added in 2012-2013).

The two DIPAC managed hatcheries are capped on available water and land use and have been stable in permitted chum salmon eggtake capacity since 2017. \*

**Consequences of the Board of Fish taking action on hatchery permitted capacity:**

***If any version of this proposal were to pass, it would open the door for uncertainty in these programs by setting a precedence that arbitrary cuts (or additions) to hatchery production could occur without thorough review through the stringent RPT scientific and public***

***process.*** If this proposal were to pass, it would lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested. It would also lead to significant increased fishing pressure on wild stocks in the Juneau area.

**Conclusion:**

Alaska's hatcheries have operated with substantial ADF&G oversight and public participation for 50 years. The hatchery operators have been working closely with ADF&G, members of the public, and the greater scientific community to better understand the impacts of these fishery enhancement programs for the entirety of their existence. ADF&G already takes into account many of the concerns raised by this proposer through the RPT planning process and various ongoing studies to better understand hatchery and wild salmon interactions.

There is currently no sound evidence to support cutting Alaska hatchery salmon production would lead to a positive change in the ocean for wild salmon or for other ADF&G managed fish species.

***Please oppose proposal 170,*** and continue to allow DIPAC to operate within current permitted capacities, and within the well-established Regional Planning Team (RPT) process, for the sake of all users and communities who rely on hatchery produced salmon.

Thank you for your efforts and time on this complicated issue, and for your consistent concern for the health of wild fish populations. We too have concern for the health of wild salmon and will continue to adjust our practices as necessary (and as well vetted, scientific evidence shows crucial) to ensure the health of salmon in Southeast Alaska for generations to come.

Respectfully,



Katie Harms  
Executive Director – DIPAC

**--- See PC 141 from the 2025 Southeast AK BOF Meeting for more detail ---**

*\* DIPAC was able to slightly increase its permitted chum salmon egg take in 2017 from 125 million to 135 million eggs due to the decommissioning of the inactive University of Alaska - CFOS wet lab that remained on site from the early 1990s through 2015. For more information on DIPAC's dedication to research and education, please see the scholarship page on DIPAC's website for a historical perspective on the program.*



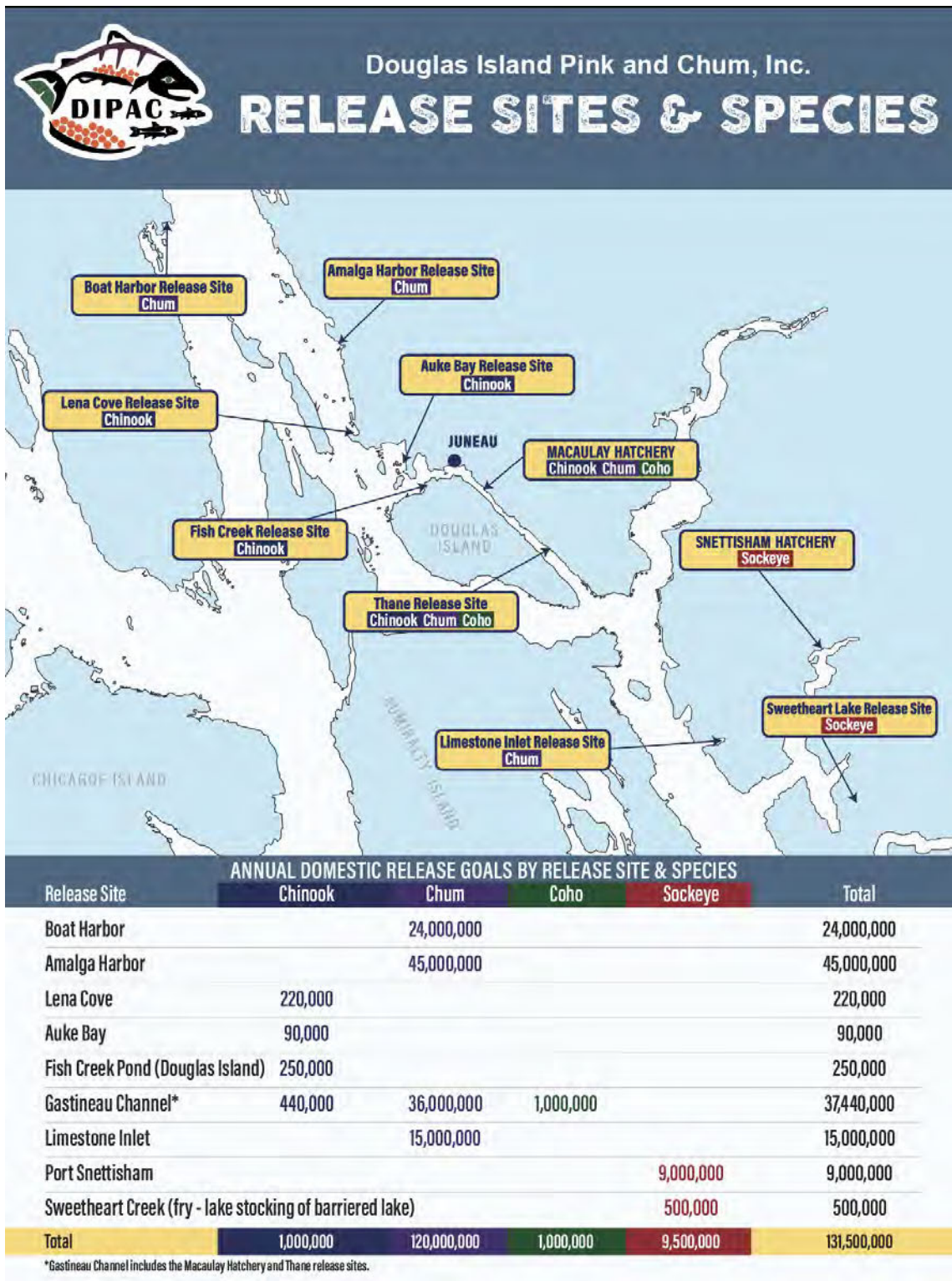


Figure provided by DIPAC: Numbers shown are current release goals for each location. The Macaulay Salmon Hatchery and Snettisham Hatchery Annual Management Plans on the ADF&G website show actual yearly releases by species, by locations.

**Submitted by:** Ben Doumit

**Community of Residence:** Cathlamet

I am writing in opposition to Proposal 186. I have been part of the Upper Cook Inlet commercial fishery my entire life, and over the years I have watched this fishery be steadily eroded by decisions driven more by political pressure than by consistent, science-based management. For decades, the Upper Cook Inlet commercial fisheries have absorbed repeated reductions in time and area. Proposal 186 is a flagrant example of this unfortunate pattern, and I am deeply concerned about its implications. It is out of cycle, unsupported by biological data, procedurally flawed, and fundamentally unfair to the drift fleet and the communities that depend on it

The proposal asserts that drift gillnet fishing in Area 1 intercepts northern-bound coho salmon and contributes to declining Upper Cook Inlet coho stocks. There is no data supporting this claim. Upper Cook Inlet contains more than 1,200 coho streams, and the two systems referenced in discussions around this proposal were the only ones that failed to meet goals last year. Using the weakest two systems out of more than a thousand to justify broad restrictions on the drift fleet is not consistent with the biological information available.

The proposal claims its purpose is to protect northern-bound coho salmon, yet the regulation it creates is not tied to coho abundance at all. Instead, the trigger for restricting the drift fleet is based entirely on sockeye run size estimates, which have no biological relationship to how many coho return to Upper Cook Inlet streams. Using sockeye abundance as the mechanism for limiting drift opportunity while claiming the goal is coho conservation is inconsistent with both science and management logic.

For these reasons, I respectfully urge the Board to reject Proposal 186. Sustainable fisheries management depends on fairness, consistency, and sound biological principles—not political pressure or piecemeal restrictions on a single user group. The long-term health of Upper Cook Inlet requires decisions grounded in science and shared responsibility.

Thank you for considering my comments.

**Submitted by:** Matt Doumit

**Community of Residence:** Lakewood, WA

While I am not currently an Alaska resident, I am a long time commercial fisherman in Cook Inlet.

Please find my attached comments in opposition to Proposal 186.

Regards,

Matt Doumit

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Matt Doumit  
11814 96<sup>th</sup> Ave. SW  
Lakewood, WA 98498

Alaska Board of Fisheries  
1255 W. 8<sup>th</sup> St.  
Juneau, AK 99811-5526

RE: Comments opposed to AK Board of Fisheries Proposal 186

To the Alaska State Board of Fisheries -

I'm writing in opposition to Proposal 186. This proposal is an unnecessary burden on the Upper Cook Inlet Sockeye fishery, it is not based in science or sound fisheries management practices, and is not tailored to achieve its stated desire of improving coho salmon runs in Upper Cook Inlet.

**Proposal is not based on data:** Proposal 186 assumes that drift gillnet fishing for sockeye in Area 1 intercepts a significant enough number of upper inlet coho so as to reduce their stocks. There are over 1,200 coho stocks in Upper Cook Inlet, and the proposal only cites two that failed to meet their coho escapement goals last year. The proposal does not actually make any effort to demonstrate that commercial sockeye harvesting is a significant factor in coho abundance in the Upper Cook Inlet, and offers no data to show that such broad restriction on drift gillnetting for sockeye will impact coho stocks in any meaningful way.

This is not the science-based fisheries management that the State of Alaska is known for. In fact, if this rule is adopted, it would hamper scientific fisheries managers by forcing them to restrict sockeye salmon fishing in certain areas and certain times of year without a scientific basis – resulting in over escapement, overcrowding in fishing areas, gear conflicts, and redistribution of fishing efforts between state and federal waters in Cook Inlet.

**Proposed Area 1 restrictions are not tied to Coho management:** While Proposal 186 claims its purpose is to protect coho runs, the restrictions are not tied to coho returns in any way. Instead, the drift fleet restrictions in the rule are triggered by *sockeye salmon* run size estimates in Upper Cook Inlet, not coho. Sockeye run sizes have no biological relationship with the size of coho runs returning to the upper inlet. It is inappropriate to use run sizes for on one salmon species in one part of Cook Inlet as a trigger for restrictions meant to protect another salmon species in a different part of Cook Inlet. This defies logic and sound, science-based management.

**Political management of fisheries does not serve salmon or users:** I have been a commercial fisherman in the Upper Cook Inlet drift gillnet sockeye fishery on and off my entire life. Over this time, I have watched as political pressure has resulted in unscientific management decisions for Cook Inlet salmon. Those political decisions have devastated Cook Inlet commercial fishing families in both the drift and setnet fleets – and have not even resulted in increased abundance of salmon.

Proposal 186 is an unscientific, inherently allocative decision that is not aimed at actually improving coho runs for everyone – it is only aimed at redistributing fishing opportunities for one user group in favor of another. The long-term health of all salmon fisheries in Cook Inlet – coho and sockeye included – depends on fairness and sound science-based management. Politically based rules and piecemeal restrictions on an individual user group will not serve Cook Inlet salmon or the users that depend on them.

Please reject Proposal 186 and move Cook Inlet back towards sound, science-based management that increases abundance and opportunities for all user groups.

Regards,

Matt Doumit, J.D.  
Commercial Fisherman  
Doumit Brothers Fishing, *F/V Skipjack*

**Submitted by:** Mindy Doumit

**Community of Residence:** Cathlamet , WA

I am opposed to proposal 186 as it will not solve any of the concerns listed. It is unnecessary.

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**Submitted by:** Kelly Drummond  
**Community of Residence:** Juneau

Greetings members of the Board of Fish,

My name is Kelly Drummond, I live in Juneau and I depend on fishing for the health of my community and employment indirectly in fisheries science and policy. I support proposals 163-165 to classify all trawl vessels as bottom trawl unless operators can prove that in compliance with state regulations they do not have any contact with the seafloor (Proposal 163), and the requirement of bottom sensors on pelagic trawl vessels (Proposal 164) and salmon excluders on pelagic trawls operating in state waters (Proposal 165). I am concerned about damage to sensitive bottom habitat by trawl operations and the bycatch of salmon and halibut in trawl operations, both important target species for commercial, recreational, and subsistence fishing.

Rationale

Proposal 163: The current State regulations prohibit seafloor contact by pelagic trawl vessels and yet statements made to the North Pacific Fishery Management Council have established substantial bottom contact by pelagic trawl operations therefore pelagic trawl is not an accurate definition and enforcement is necessary to ensure adherence to the state regulations.

Proposal 164: The use of bottom sensors on pelagic trawl vessels in all areas or in areas closed to bottom contact are necessary for accurate fishing activity, enforcement, and regulation. Accurate data on bottom contact is a benefit to all.

Proposal 165: There is known incidental catch of halibut and salmon in trawl operations and the use of salmon excluders is an essential measure to decrease salmon bycatch in state waters.

Thank you.

**Submitted by:** Clay Duda  
**Community of Residence:** Homer

Below are two comments for different proposals -- prop 176 (support) and prop 183 (opposed). Please take these thoughts into consideration.

Proposal 176 - Support

My name is Clay Duda and I am a charter owner and operator based in Homer. I am in support of Proposal 176. It is a no-nonsense way to promote conservation during a time of low abundance in our fisheries and also simplify retention and enforcement efforts.

The charter fleet has size restrictions on several species of fish. Under the current regulatory structure we are forced to release damaged fish regularly that we'd otherwise be able to retain towards a cumulative bag limit. Most vessels obtain limits of targeted species on most days, so shifting from an individual bag limit to a cumulative bag limit would have negligible impacts on catch per unit effort (CPUE) and would not lead to increased retention. In fact, it would cut down on fish mortality since fewer injured fish would be released into the water. Section a(4) of the proposal would also place increased restrictions on crew preventing them from transferring crew-caught fish to passengers, which is allowed under current regulations.

For many of us working on the water, this is a no-brainer. We're poking holes in fish and being forced to release them because, as a for-instance, a fish is biting the hook of an angler who already has a limit or size-restricted

slot, and not taking the hook of the angler next to them who is still looking for a dinner fish. If you have ever been on a hot salmon bite that's a mix of kings and silvers, you probably understand what I'm talking about.

I believe this will simplify enforcement and largely self-regulate across saltwater sport fisheries. People pay to go on a charter to catch fish. That won't change. If we're not giving people the opportunity to catch fish, they simply won't return for another venture. Allowing cumulative limits, however, clears up a lot of the guess work for law enforcement about who hooked what or who reeled what, and it's easier to enforce than our current regulations.

Further, the measure would help promote involvement in fisheries for younger anglers who, under the current regulations, are not allowed to have assistance in hooking a fish to legally retain it under their individual bag limit.

#### Proposal 183 - Oppose

My name is Clay Duda and I am a charter owner and operator based in Homer. I am strongly opposed to Proposal 183 as it's currently written. The proposal is overly broad, would have severe impacts on port operations in coastal communities throughout the state, and also has the potential to place undue burdens on many businesses operating along Alaska's coastline.

There is a real question if current harbor infrastructure and operations could handle the disposal of every single fish carcass caught at sea. In Homer, there are 2 fish dumpsters and 1 "grind shack" operation to process and dispose of them. Requiring the retention of ALL fish carcasses without an appropriate funding mechanism would exponentially strain these limited resources and would lead to a dramatic increase in needed manpower to handle mountains of rotten fish.

Currently, charter operations are federally required to retain halibut carcasses with a size restriction and also retain all fillets for all species un mutilated until we hit the dock so they may be counted for enforcement purposes. Many charter captains choose to retain the carcasses of other fish species with a size restriction, such as ling cod, to ensure we are following the letter of the law.

The mechanisms for enforcement are already there, and they work.

If the intent of this proposal is to ensure size restrictions are followed, it should say so.

The heavy-handed language of this proposal is overly broad and raises concerns if filleting at sea will be allowed. If not, this would have a huge economic impact on the charter fleet and private fishermen, and continue to strain port and harbor infrastructures around the state. Most charter operations fillet at sea and dispose of the majority of fish carcasses at sea. Waiting to fillet dockside would greatly increase labor and expenses for our businesses.

As-written, this is a bad proposal for the state of Alaska and the people who live here. If it were amended to require only the retention of fish with size restrictions, I would likely support it.

---

Below are two comments for different proposals -- prop 176 (support) and prop 183 (opposed). Please take these thoughts into consideration.

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As-written, this is a bad proposal for the state of Alaska and the people who live here. If it were amended to require only the retention of fish with size restrictions, I would likely support it.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Max Durtschi, and I am the owner and operator of a purse seine commercial fishing vessel in Prince William Sound. I operate through Durtschi Brothers LLC and fish aboard the F/V Chicane.

If hatchery production is decreased, it has the potential to make my business no longer viable. It would also make the million dollars' worth of equipment and permits I own effectively worthless.

The impacts of these proposals will extend beyond fishermen to related businesses and families across the towns of Prince William Sound, including Whittier, Valdez, Cordova, and Seward.

If the goal of the Board is truly conservation of Alaska salmon populations, it should target increased regulation toward user groups that affect spawning grounds. In my view, industrial impacts and in-river users pose real threats to wild salmon populations, not competition from hatchery-produced fish.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Reiker Durtschi, and I am a commercial fisherman and business owner in Alaska. I captain the F/V Freeberd out of Valdez, Alaska.

If these proposals are adopted, I believe they would have significant negative impacts on the sustainability of local Prince William Sound wild salmon stocks and would devastate local hatchery operations. If Prince William Sound hatcheries are forced to reduce egg take, it will start a downhill track that will make commercial fishing no longer profitable for everyone involved — from boat owners to crew members and everyone involved at the processing level.

All user groups — subsistence, commercial, and sport — who enjoy access to salmon in Prince William Sound will see a dramatic reduction in stocks, both hatchery and wild. In my view, groups who oppose hatcheries are ignoring serious in-river factors, including temperature changes, pollution, and increases in sport users where reporting is not mandated in-season and enforcement is limited. These factors are having a much larger effect on diminishing fish returns, especially in road-system river systems.

The Board should understand these hatcheries are critical to all user groups in Prince William Sound, and a reduction in egg take and production will have no measurable positive effects on fish returns to other areas.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

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coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Reiker Durtschi

Alaska



**Submitted by:** Emily Eastman

**Community of Residence:** Eagle River, Ak

There should be zero trawling allowed within Alaskan waters. As long as Alaskan residents are not allowed to fish, shrimp, or set crab pots in their state waters to fill their freezers, no trawler should be allowed to pillage and destroy the ocean. I have fished in this state for over 30 years, and the correlation between the trawl boats and the sudden decline of fish and marine life is obvious. Please put Alaskans first.

**Submitted by:** Duane Edelman

Seafood Sales

**Community of Residence:** Kenai, Alaska

SEE ATTACHED ALSO

Proposal 163, 164, 165

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

- Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.
- Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.
- Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

I'm a 70 year old lifelong commercial fisherman who throughout my career has participated in numerous fisheries throughout the State of Alaska. Currently I'm a longline fisherman with Halibut IFQ shares & a PWS Sablefish longline permit holder.

Why I support banning Trawling as a fishing method in Alaskan State Waters?

Stop Alaskan Trawler Bycatch!

Let's talk about the Alaskan Trawl fishery bycatch. Alaskan Trawl fishery bycatch is a cause of the symptom. The symptom is the degradation & destruction of the Pacific Northwest Gulf of Alaska ecosystem. The trawl fleet isn't licensed to catch & sell all their bycatch. As a small example, they aren't licensed to catch Crab, Halibut, Salmon etc.... (a long list) they are there mainly for Pollock. Trawling, that style of fishery is the most indiscriminate destructive style of fishery that exists. Pulling out billions of pounds of forage fish, while killing everything in the nets from the compression of the catch on one another, (fish gills need to be able to move to circulate water to stay alive), all while destroying the ocean floor environment. Scaring the sea floor as the net drags along the sea floor destroying centuries old coral & sponge growths that provide necessary habitat for the support of our SeaLife resources. Dragging the bottom in this manner is TOTAL DESTRUCTION!

I have seen comments of others say that "This dead wanton waste style fishery can't be blamed for the crash of the Halibut, Chum, King, Crab, Stellar Sealion, they are the casualties of climate change. Just look at the record Red Salmon returns compared to the Chum & King Salmon returns." They totally don't understand that Red Salmon are Plankton eaters. They compare Red Salmon to Halibut, Chum, King, Crab, Stellar Sealion that are meat eaters (eating Pollock, also known as forage fish) not Plankton eaters like Red Salmon.

In response to comments about discarded Trawler bycatch, Trawlers aren't allowed (licensed/ permitted) to sell the discarded bycatch. Trawling is responsible for dumping 1.41 million pounds of bycatch over a ten-year period.

The main point about this fishery is the raping & destruction of our Pacific Northwest Gulf of Alaska ocean ecosystems for short term profits by shoveling money at the public, universities; lobbyists, lawyers & regulators with the Gulf of Alaska BLOOD MONEY!

That is why I support banning Trawling as a fishing method in Alaskan State Waters

Stop Alaskan Trawler Bycatch!

ARE YOU AWAKE YET?

Sincerely,

Duane F. Edelman

---

Proposal 163, 164, 165

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

- Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.
- Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.
- Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

I'm a 70 year old lifelong commercial fisherman who throughout my career has participated in numerous fisheries throughout the State of Alaska. Currently I'm a longline fisherman with Halibut IFQ shares & a PWS Sablefish longline permit holder.

Why I support banning Trawling as a fishing method in Alaskan State Waters?

Stop Alaskan Trawler Bycatch!

Let's talk about the Alaskan Trawl fishery bycatch. Alaskan Trawl fishery bycatch is a cause of the symptom. The symptom is the degradation & destruction of the Pacific Northwest Gulf of Alaska ecosystem. The trawl fleet isn't licensed to catch & sell all their bycatch. As a small example, they aren't licensed to catch Crab, Halibut, Salmon etc.... (a long list) they are there mainly for Pollock. Trawling, that style of fishery is the most indiscriminate destructive style of fishery that exists. Pulling out billions of pounds of forage fish, while killing everything in the nets from the compression of the catch on one another, (fish gills need to be able to move to circulate water to stay alive), all while destroying the ocean floor environment. Scaring the sea floor as the net drags along the sea floor destroying centuries old coral & sponge growths that provide necessary habitat for the support of our SeaLife resources. Dragging the bottom in this manner is TOTAL DESTRUCTION!

I have seen comments of others say that "This dead wanton waste style fishery can't be blamed for the crash of the Halibut, Chum, King, Crab, Stellar Sealion, they are the casualties of climate change. Just look at the record Red Salmon returns compared to the Chum & King Salmon returns." They totally don't understand that Red Salmon are Plankton eaters. They compare Red Salmon to Halibut, Chum, King, Crab, Stellar Sealion that are meat eaters (eating Pollock, also known as forage fish) not Plankton eaters like Red Salmon.

In response to comments about discarded Trawler bycatch, Trawlers aren't allowed (licensed/ permitted) to sell the discarded bycatch. Trawling is responsible for dumping 1.41 million pounds of bycatch over a ten-year period.

The main point about this fishery is the raping & destruction of our Pacific Northwest Gulf of Alaska ocean ecosystems for short term profits by shoveling money at the public, universities; lobbyists, lawyers & regulators with the Gulf of Alaska BLOOD MONEY!

That is why I support banning Trawling as a fishing method in Alaskan State Waters

Stop Alaskan Trawler Bycatch!

ARE YOU AWAKE YET?

Sincerely,

Duane F. Edelman



**PC158**

**Submitted by:** Em Eff

**Community of Residence:** Homer

Please ban trawl within 3 miles. It is indiscriminate, the only form of fishing that has direct impact on all others. It has no place in a time of declining stocks.

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**PC159**

**Submitted by:** Jorgen Eliason

**Community of Residence:** Sotka

As a local SE AK seiner I am writing in strong OPPOSITION to proposal 170. I am also in opposition to proposals 171 and 172.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Richard Eliason, and I am a third-generation Alaskan fisherman, born and raised in Sitka, Alaska. I have been fishing since 1967 and bought into my own salmon fishery in 1987. I have been fishing hatchery fish since 1991, and within the last 20 years, hatchery fish has been my main catch, contributing to about 90 percent of my yearly gross. I am the owner and operator of the F/V Laurel C.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would put me out of business and render my business and my retirement financially worthless.

It would be a financial hit to the community of Sitka, since the salmon fleet catches a tremendous amount of hatchery fish — seiners, gillnetters, and trollers alike. These proposals would financially devastate the already struggling salmon fishermen in Alaska.

The Board should take into consideration that the salmon fishermen in Southeast Alaska are dependent on hatchery fish.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Richard Eliason  
Sitka, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Camden Erickson. I am a young commercial fisherman and the owner/operator of a troll/longline/tender vessel, the F/V Norseas, based in Juneau.

These proposals would affect me and many fellow fishermen in several ways. Reduced hatchery returns mean less fish to catch and less revenue across salmon fisheries. It also reduces tendering days and income in an already tight environment. Reduced hatchery returns also affect other fisheries by reducing availability of bait salmon (often pink and chum), which impacts operating costs for halibut and crab fleets that are already strained by higher bait prices and lower ex-vessel value.

The broader community impact would be substantial for commercial, sport, and charter sectors, as well as locals who depend on hatchery fish for food. A 25% reduction could push the industry into a non-viable direction, damaging coastal economies for a policy shift that is not supported by complete research.

Hatcheries provide one of the few remaining sources of certainty in commercial salmon fishing—whether through common property opportunity, cost recovery, or tendering. That certainty supports business planning and keeps communities stable.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Camden Erickson  
Juneau, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Shelly Erickson, and I am a local business owner who supports commercial fishing and tourism. I am also a sport fisherman and community member in Alaska.

Our community depends on all fisheries and hatcheries economically. With the large reduction in our fisheries due to the bycatch issue we are seeing affect fish numbers, reducing hatchery fish would only worsen the problem of low fish availability and the economic benefits tied to commercial, sport, and subsistence fishing. Economically, the commercial and sport fisheries would be hit the most, and that includes tourism, which is a major part of our local economy.

Once we start removing something, it will be a fight to correct it, even if it is later proven harmful to our communities. I do not understand why people “feel” they need to shut down hatcheries when other management issues are depleting multiple species. Those issues need to be fixed first. I also do not understand why the Board of Fisheries would cave to a “shut down the hatcheries” movement, because I do not see it as science. From my experience, those claiming it is science have no real proof, and the concerns raised have been circumstantial.

Science has to be more than emotional lobbying. I have watched over the years how pressure from groups can destroy healthy ecosystems. “Facts” that are not based on real science, but on preferences, can be damaging to our long-range fisheries. Blaming hatchery fish for other species declines while protecting predators that are actually eating other species is not right.

Bycatch and mismanagement of fisheries, including conflict between commercial and sport management, are significant issues. We need to be increasing salmon stock and availability and looking at regulations on fisheries that are depleting and mismanaging fish stocks before shutting down hatcheries.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Shelly Erickson

AK



**Submitted by:** Francis Estalilla

**Community of Residence:** Aberdeen WA

Prop 11: Support... while you're at it, consider closing ALL state waters to trawling.

Props 163, 164, 165: Support. Bottom contact with "pelagic" in areas closed to bottom trawling needs to stop. These are all good proposals to prevent "pelagic" trawlers from gaming the system in their favor. The days of "ALL paths lead to continued trawling" must come to an end. A fourth grader understands the fundamental intent here. If the Board rejects these individual proposals, it is incumbent on you to formulate a blend of these proposals or your own Board generated proposal to get these nets off the bottom. JUST GET IT DONE!

Prop 169: Support. Just follow the staff recommendation

Prop 170, 171, 172 SUPPORT. Pass one, pass ALL. But for the love of North Pacific salmon stocks, PASS SOMETHING! The days of subsidized and senseless production of bazillions of hatchery chum and pink salmon need to come to a HALT! Any reduction in production would be a beneficial action for ailing WILD salmon stocks, particularly abysmal chinook salmon populations statewide.

Prop 173: SUPPORT. Just get it done as recommended by staff. Common sense.

Prop 176, 177, 178: SUPPORT with clarification. The BOARD should fully support NON-COERCIVE pooled limits for groups of friends or family fishing together... BUT... no paying client should be forced or coerced by captain/crew into keeping ANY fish sport-caught by any another angler on board that counts against said client's limit. In other words, each angler MAY consent to having another angler catch their limit, but would NOT be required to do so simply to achieve the aggregate boat limit faster and end the trip.

Prop 179: OPPOSE. Ten kings is WAY too many. Chinook salmon are struggling EVERYWHERE... not just AK, but BC, WA, OR, and CA. Prop 180 is a MUCH better alternative.

Prop 180: SUPPORT. About damned time this happened as kings are struggling EVERYWHERE. Just get it done.

Prop 186: SUPPORT conceptually. Not familiar with all of the specific language and details necessary to meet the conceptual intent of this proposal... but additional constraints on the drift fleet needs to happen to improve coho escapement (and sockeye, too!) into the MatSu Valley. K/K-centric management for maximum harvest of UCI sockeye has badly damaged stocks of less abundant species like coho. The time to enact measures to tread lighter on these ailing stocks is long overdue. Prop 186 is a good start, but feel free to restrict the drift fleet even further if necessary. Even if the Board rejects this proposal as written, someone at the table needs to champion this cause so that it doesn't wither on the vine. Just do SOMETHING to satisfy the proposer's intent.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Evans. I am an Area E permit holder and fish aboard the Bella Donna.

Proposals 170, 171, and 172 would harm income stability, job security, access to fish, business viability, family livelihood, and operational planning. Reduced harvest opportunity would also mean fewer processing jobs, loss of economic stability, reduced food availability, and ripple effects across local businesses.

These proposals do not reflect a careful, measured approach. Broad cuts risk weakening a system that has historically relied on planning, permits, and adaptive management, and they could reduce forage availability that many marine species depend on.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
William Evans  
Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Evens. I am a drift gillnet fisherman in Southeast Alaska and fish aboard the F/V Nordlys.

Enhanced fish are a major part of our fishery, and I believe they supplement harvest significantly. If hatchery production is reduced through Proposals 170, 171, and 172, many small operators could be forced out of business. Petersburg is built on fish dollars and raw fish tax revenue, and the region would suffer economically from reduced opportunity and instability.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

David Evens  
Petersburg, Alaska



**Submitted by:** Jessica Faircloth

**Community of Residence:** Kenai Peninsula

Bottom trawling is marine deforestation. It should not happen within state waters, at any distance.

---

**Submitted by:** Jessica Faircloth

Jessica Faircloth for Governor of Alaska

**Community of Residence:** Kenai Peninsula

Bottom trawling is marine deforestation and should not be allowed anywhere on the earth.

---

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Angela Ferrari, and I am a community member based in Anchorage, Alaska.

I am concerned these proposals will reduce access to fish. I also fear a loss of processing jobs, reduced economic stability, and ripple effects to local businesses. I am worried about fewer wild salmon in our streams and the lack of scientific research needed to make a good decision for Alaska communities.

Bycatch and industrial trawl impacts may be another major factor in fish declines, and I believe those issues must be addressed as part of understanding salmon trends.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Angela Ferrari  
Anchorage, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Michael Ferris, and I am a commercial fisherman and Kodiak salmon seiner vessel owner and operator. I am a lifelong Kodiak resident of 49 years, and my vessel is the F/V Nalu.

If Proposals 170, 171, and 172 are adopted, they would negatively affect my business and other small boat operations. I make a large percentage of my salmon seasons in the north section of Kodiak and rely heavily on Kitoi Bay Hatchery returns to provide a viable business for myself and my crew's families.

Given how fisheries are already restricted for fishing time due to king salmon escapement, I believe hatcheries should hatch and stock more streams rather than reduce production.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

**Submitted by:** Steve Fish

**Community of Residence:** Sitka

170,171,172 opposed

I am against for profit hatcheries and/or fish farms in Alaska

---

**Submitted by:** Russell Fitzwater

Gore Point

**Community of Residence:** Girdwood PWS

The PWSAC hatcheries are currently and have been struggling to produce a viable return for the commercial fleet (See past five year fleet catch after cost recovery taken) at the current number of eggs taken.

Reducing the egg take amount will cause the hatchery programs to become unsustainable as the entire return will have to be used to cover operation costs and leave nothing for the fisherman.

Without the hatcheries "boost" in salmon quantity the PWS commercial fishery will be destroyed as we cannot reach revenue levels to sustain costs of participation in the fishery. This would cause a domino effect destroying multiple economies and communities connected to the fishery.

There is no data to support the idea that the reduction of eggs taken at the hatcheries will help in anything, more data exists to the opposite.

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**Submitted by:** David Fleming

**Community of Residence:** Cordova, AK and Palmer, AK

My name is David Fleming. I am a 3rd generation commercial fisherman in Prince William Sound. My family continues this tradition with 2 siblings and a wife who are all permit holders in the drift, setnet, and seine fisheries. Please see below oppositions to the following proposals.

Proposal 170: I oppose proposal 170

Proposal 171: I oppose proposal 171

Proposal 172: I oppose proposal 172

These proposals were created on unresolved science. They pose significant economic risk, and broad impacts to fishing access across all user groups. Hatchery permitting and scientific oversight belong with ADF&G through Alaska's existing management system. Using Board of Fish egg take reductions to drive hatchery policy circumvents science-based permitting, limits community input, and risks unintended statewide consequences.

Proposal 187: I oppose proposal 187

There are no conservation or access concerns here. This would close traditional fishing opportunities in favor of sport users that currently have no problem catching full limits.

Thank you for your consideration,

David Fleming

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Hayley Fleming, and I live in Cordova, Alaska. I am a commercial fisherman, a member of CDFU, and a Tribal member with the Native Village of Eyak.

If Proposals 170, 171, or 172 were adopted, my income stability would be drastically reduced. Arbitrarily reducing hatchery production in Alaska does nothing to stop the 2.9 billion hatchery salmon released in Japan and Russia each year. Cordova would be devastated by these reductions.


I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Hayley Fleming  
Cordova, Alaska  


**Submitted by:** Kevin Foley

**Community of Residence:** Anchorage

Kevin M. Foley

Alaska Resident, Personal Use Participant

Anchorage, AK

Subject: Opposition to Statewide Fisheries Proposal 175

Dear Chair Märit Carlson-Van Dort and Members of the Board,

I am writing on behalf of myself to express my strong opposition to Statewide Fisheries Proposal 175, which seeks to amend 5 AAC 39.105 by reducing dipnet mesh size from 4.5 inches to 3.5 inches and banning the use of a rope attached to the dipnet handle and tied to the boat.

I fully recognize and support the importance of Chinook Salmon conservation in Alaska, particularly during a time when so many Chinook stocks across the state are experiencing declines. The proponent's intent to reduce incidental bycatch of Chinook Salmon is commendable. However, this proposal has far-reaching implications for dipnet fisheries in rivers and systems where Chinook Salmon do not occur, but other species, such as Sockeye Salmon, are the intended harvest with dipnet gear from a boat. Adopting this proposal would unnecessarily restrict users in these systems, impacting subsistence, personal use, and commercial opportunities without notably contributing to Chinook Salmon conservation.

If the goal is to reduce incidental Chinook bycatch, I would be more supportive of separate, targeted proposals that seek to reduce dipnet mesh size only in systems that support runs of both Chinook Salmon and the targeted species (e.g. Sockeye Salmon). Such an approach would address conservation concerns without imposing blanket restrictions statewide. A proposal as broad as Proposal 175 is overly far-reaching and potentially detrimental to subsistence, personal use, and commercial users throughout Alaska.

Additionally, the claim that a rope attached to the dipnet handle "extends the reach" of the net is inaccurate. The handle length is fixed; the rope simply allows fishers to utilize the full regulated length of the handle at depth, as arm strength alone is often insufficient to hold a net in position while a boat is adrift or underway. Prohibiting rope use would make using a dipnet at any depth yet alone maximum depth, nearly impossible for many users.

If Chinook conservation is the true objective, a more appropriate solution would be to limit the maximum dipnet length, defined as the greatest distance measured from the hoop or net frame (to which the netting or net bag is attached) to the handle tip at the opposite end of the hoop or frame. This would directly address gear dimensions without unnecessarily burdening subsistence or personal use fishers.

For these reasons, I urge the Board to reject Proposal 175 and consider more targeted

measures that balance conservation goals with the needs of Alaskans who participate in personal use fisheries.

Thank you for your careful consideration.

Sincerely,

Kevin M. Foley

Alaska Resident, Personal Use Participant

Anchorage, AK

---

Kevin M. Foley  
Alaska Resident, Personal Use Participant  
Anchorage, AK

28, February, 2026

Alaska Department Board of Fish  
PO Box 115526  
Juneau, AK 99811-5526

**Subject: Opposition to Statewide Fisheries Proposal 175**

Dear Chair Märit Carlson-Van Dort and Members of the Board,

I am writing on behalf of myself to express my **strong opposition** to **Statewide Fisheries Proposal 175**, which seeks to amend 5 AAC 39.105 by reducing dipnet mesh size from 4.5 inches to 3.5 inches and banning the use of a rope attached to the dipnet handle and tied to the boat.

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If the goal is to reduce incidental Chinook bycatch, I would be more supportive of separate, targeted proposals that seek to reduce dipnet mesh size only in systems that support runs of both Chinook Salmon and the targeted species (e.g. Sockeye Salmon). Such an approach would address conservation concerns without imposing blanket restrictions statewide. A proposal as broad as Proposal 175 is overly far-reaching and potentially detrimental to subsistence, personal use, and commercial users throughout Alaska.

Additionally, the claim that a rope attached to the dipnet handle "extends the reach" of the net is inaccurate. The handle length is fixed; the rope simply allows fishers to utilize the full regulated length of the handle at depth, as arm strength alone is often insufficient to hold a net in position while a boat is adrift or underway. Prohibiting rope use would make using a dipnet at any depth yet alone maximum depth, nearly impossible for many users.

If Chinook conservation is the true objective, a more appropriate solution would be to limit the maximum dipnet length, defined as the greatest distance measured from the hoop or net frame (to which the netting or net bag is attached) to the handle tip at the opposite end of the hoop or frame. This would directly address gear dimensions without unnecessarily burdening subsistence or personal use fishers.



For these reasons, I urge the Board to **reject Proposal 175** and consider more targeted measures that balance conservation goals with the needs of Alaskans who participate in personal use fisheries.

Thank you for your careful consideration.

Sincerely,  
Kevin M. Foley  
Alaska Resident, Personal Use Participant  
Anchorage, AK

**Submitted by:** Jacqueline Foss

**Community of Residence:** Sitka

Comments on hatchery proposals

My name is Jacquie Foss. My husband and I are commercial salmon trollers based in Sitka Alaska. We are the only hook-and-line commercial salmon fishery in the state of Alaska. Our operation is inefficient by design because our focus is on quality and not quantity. Every fish that we land is handled with care, producing the finest fish on the market.

I have the highest respect not just for the salmon I catch but the salmon I don't and the habitat that sustains all of us. I advocate for healthy marine, aquatic, and terrestrial habitat to ensure that Alaska's wild salmon are well cared for. I applaud conservative management of salmon stocks by the Department. I never like being tied up but am willing to do so for conservation.

I am a board member of the Northern Southeast Aquaculture Association (NSRAA) and on the Northern Regional Planning Team (RPT). My time on these two boards has been an education. The hatchery organizations in SEAK are committed to science-based management and regularly collaborate with NOAA, the Department, and universities to better understand wild and hatchery-produced salmon. The fishermen I work alongside are all committed to healthy wild stocks.

My most important species I catch are chinook (king salmon) and coho. I also catch chum salmon. Hatcheries in southeast Alaska produce all three of these species. Chum, is what makes it possible for hatcheries to cover the cost to produce chinook and coho.

Proposals 170 through 172 all aim at curtailing hatchery operations in various ways. Several other comments will address the spurious claims in all of these and the lack of scientific basis for these reductions. Instead of that, I will tell you in no uncertain terms that a reduction in chum production means a steeper reduction in Chinook and coho production. I noticed that none of these hatchery proposals advocate for a reduction in the production of any of these species. Chinook and coho are popular targets for guided and sport fishermen as well as commercial.

I am concerned that any reduction in the production of chinook and coho would lead to more strain on our wild stocks. Hatcheries were built to relieve the stress on wild stocks and they have been successful. Wild stocks have rebounded from the lows in the 70's and 80's.

Financially this would be devastating for my family. It would be at least a 25% reduction in our gross income, in a time when expenses are skyrocketing. As a troller, we had 3% of our king salmon allocated away from us in 2025 and that was difficult enough. Now folks from Fairbanks (where they have all of the big box stores that keeps the price of goods down) want to make it harder for me to make a living as a rural Alaskan. Since when do we let people who live more than 1,000 miles away tell us how to manage our fisheries? Would we let folks from Seattle do that? I can tell you after the Wild Fish Conservancy lawsuit, we do not.

A 25% reduction is arbitrary, not based on any scientific data, and is applied state-wide. This is a very blunt instrument that doesn't consider any nuance across several thousand miles of shoreline. Further, these proposals are completed without collaborating across user groups and stakeholders to find a solution forward. It is my understanding that the Board of Fish looks for collaborative solutions that bring everyone together.

I do not support proposals 170, 171, or 172 and I urge the Board of Fish to vote against them.

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**Submitted by:** Tory Fredrickson

**Community of Residence:** Wasilla

We need to take action on trawling in all State of Alaska waters. Trawling has continued to strain our fisheries to the point where we may never recover. Trawling is an indiscriminate and catches everything in its path. Crab, salmon, and halibut stocks are severely threatened. I have sport fished for 7 years in the salt and ever year it gets tougher to find halibut and rock fish to feed my family. Resources need to be managed for the benefit of its residents, not to enrich peoples bank accounts. Please put Alaska and its residents first.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Andrew Friske, and I am a commercial fisherman, small business owner, lifelong Alaska resident, and parent of a young fisherman. I have fished hatchery-produced salmon and depend on them as part of my annual income. I operate the F/V Allure, and hatchery-produced chum salmon made it possible for me to move back to Alaska and afford to live here. Hatchery fish provide critical income stability in years when wild stocks fluctuate. Reducing hatchery production would directly reduce earning opportunity, increase financial uncertainty, and make it harder to plan for crew, fuel, gear, and family expenses.

Reduced hatchery production would mean fewer fish to harvest, fewer processing hours, and less economic activity in coastal communities. That impacts deckhands, processors, fuel docks, mechanics, air freight, local stores, families, and many more. Communities in Southeast rely on predictable returns to support working families. Taking that stability away creates ripple effects far beyond just fishermen.

There is real risk in making permanent reductions without clear, Alaska-specific science showing hatcheries are the cause of regional declines. If reductions are made and ocean survival improves later due to climate cycles, we will have cut opportunity for no measurable benefit. We could permanently damage working waterfront economies based on assumptions rather than proven cause-and-effect.

Major structural changes should not be made before ongoing research is complete. Decisions should be based on updated data and comprehensive regional planning, not precaution alone. Once egg takes are reduced and infrastructure scaled back, rebuilding capacity would be extremely difficult.

Ocean conditions, warming trends, marine survival variability, and freshwater habitat shifts are well-documented drivers of salmon productivity. These are large-scale forces outside hatchery control. Focusing primarily on hatcheries risks diverting attention from climate adaptation, habitat protection, and marine research that likely have greater influence on long-term salmon health, not to mention large scale trawling.

Hatcheries provide stability in an industry defined by uncertainty. They smooth out extreme variability, help keep young fishermen in the fleet, and support year-class diversity in harvest timing. They do not replace wild fish, they supplement opportunity in a managed, science-based way. Removing that stability increases volatility for families and communities that are already operating on tight margins.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Andrew Friske  
Southeast, Alaska



**Submitted by:** Michael Galligan

F/V Karen Evich

**Community of Residence:** Friday Harbor WA

Hello ALL members of The Board of Fish,

My Name is Michael Galligan and I have been a Commercial Fisherman in the State of Alaska since 1972. Yes, over 4 Decades. You could say, I've seen some changes and have learned to "Adapt" to "Survive" in Commercial Fishing in Western Alaska, specifically The Alaska Peninsula, Aleutian Islands, and Chignik, ALL AREAS Which I currently hold Permits and have participated in for as I said, over 4 Decades. It is becoming Extremely difficult and as I get to the end of my career, I'm becoming extremely concerned in The Board's ability to Truly "Develop the Fishery Resources" for the communities of The Alaska Peninsula and Aleutian Islands.

Increasing Reductions in both Time and Gear Types and the Science that has proved their ability to harvest these species efficiently and effectively With years of study and adaptation by both The Department of Fish and Game and the self financed Studies by the Fishermen and Communities they live in, is being continually ignored for the Political Gain of Powerful Political Lobby's that are more interested in Economic Expansion of businesses than the survival of the Historic Communities, Family's, and the way of life, that is Frankly YOUR job to protect, conserve, and develop with "good judgement" as directed when you accepted your appointments from the Governor to do so.

With ALL due respect, I do understand the Enormous Responsibility you each have taken on in excepting these positions with the diversity and points of view of all the Communities and user groups of the fisheries you are in charge of making allocative decisions and the department is ultimately responsible for management based on those decisions. It's an Enormous responsibility. The literal Lives of these communities are in your Simple "YES" or "NO".

That being said, I hope I can add 40+ years of experience in some of this process.

I am apposed of Proposals 11, 163 and 164. And Here's why;

Proposal 11

The closure of all State Waters in The Bering Sea-Aleutian Islands to fishing with Trawl Gear west of the 170 degree W longitude line would eliminate any chance of continued development of the Small Boat, under 60', Fleet that has been trying to establish itself in the development and survival of the Communities of Adak, and Atka for over 25 years. There have been multiple attempt to save these communities by establishing a stable and reliable Shore Based Processor in both these communities. Clem Tillion with Government support, dedicated the latter years of his life helping set up markets out there to insure the survival of those communities. This would END any hope of ever allowing any Processor to develop this extremely Valuable resource for the future of these struggling communities.

And YES, I recognize that this Proposal is specifically targeting "Factory Trawler" activity but, the way this is written, it will end all hope for any Processor in the Future to do so.

Proposals 163 & 164

With over 4 decades of experience fishing both "Pelagic" (Mid-Water) and "Non-Palagic" Bottom) Trawls in Alaskan State Waters of the Alaskan Peninsula and The Bering Sea-Aleutian Islands, I fail to see the purpose and redundancy of these two Proposals with

The "Redefining" of Pelagic Trawls because of the possibility of contact with the sea floor bottom and then, after the fact, require additional studies to see if this is even an issue.

First, even Webster defines "Palegic" as "of, relating to, or living or occurring in the open sea: OCEANIC." Now, Webster doesn't define our fisheries but, to assume a Pelagic or what fisherman call "Mid Water" Nets NEVER

touch the bottom is taking this to another level in what I see in this as, the real Issue implied here, to ATTACK and ELIMINATE all trawling in The State Waters of The Alaska Peninsula, Bering Sea-Aleutian Islands.

POLLOCK is the main specie with involvement in the use of a Pelagic or midwater trawl and there can be contact with the bottom in the harvest of this specie. YOU know this as it has been taking place in Kodiak, The Alaska Peninsula, Bering Sea and Aleutian Islands for the better part of the last Century! That being said, mid water nets are NOT designed to be Non Pelagic nets. Bottom Contact can, will and does literally damage and in many cases destroy mid water nets. NO Fisherman wants extended bottom contact with his Mid Water Net BUT, at times, it can be completely necessary to, incidentally make contact with the bottom to harvest the target specie which is most often in these cases Pollock.

AND ALL POLLOCK BOATS ARE and have been extremely monitored with on board Observers and Camera Systems for Decades. There are Ample amounts of information on Pollock Fisheries. This is “Cart before the Horse” Stop and then Study??? Redundancy.

#### BOARD OF FISH RESPONSIBILITY HERE

This is ALL about Trawling for both Pollock and Cod in State waters. There is and has been an outright cry by Environmental Groups and The High Financed Tourism thru Sport Fishing Groups to Eliminate ALL Trawling in the State Waters of Alaska for years. The Alaskan Trawl industry has demonstrated its ability to take action and to adapt to the Environmental Requirements necessary to insure the sustainable harvest of both pollock and cod in the Alaskan State waters ESPECIALLY and SPECIFICALLY in the State Waters of the Alaskan Peninsula and the SMALL BOAT FLEET (under 60’) of the Communities of Sand Pt, King Cove, and False Pass.

Elimination of THE SMALL BOAT TRAWL Fishery in the State Waters of the Alaska Peninsula would be a devastating blow to these communities...ESPECIALLY AFTER THE BOARD OF FISH RECENTLY STATED ON RECORD In its decision to further reduce through both Gear and Time Restrictions to the Salmon Fleet.....

“These Fisherman have OTHER FISHERIES to fall back on that lessen the impact of these decisions.”

NOW, YOU would take away the SMALL BOATS ability to harvest by trawl Pollock and Cod in the State Waters of the Alaska Peninsula???

Do YOU realize that Pollock and Cod are the Annual Financial Foundation to the Processing Companies and the Fisherman, Family’s and Communities of The Alaska Peninsula?

PLEASE CONSIDER THIS BEFORE YOU VOTE YES to these Proposals.

We really need YOU to protect the SMALL BOAT Under 60’ Fleet that is vital and essential to these Communities right now! HELP US.

#### OPEN INVITE

I SERIOUSLY personally invite any of you to come onboard my vessel and take a trip with us while harvesting pollock with a midwater net. It would be really educational and you would see, with all the new salmon excluders, fish finding equipment and REQUIRED CAMERAS AND MONITORING SYSTEMS how extremely clean and efficient we have become with salmon excluders and minimal bottom contact with our “Pelagic” Mid Water nets.

Thank You, Really, FOR TAKING THE TIME TO READ THIS DIATRIBE, I know YOUR Jobs are extremely difficult and the decisions you make are Enormous and effect the lives and livelihoods of thousands of people, family’s and communities.

GOD BLESS YOU.

Michael Galligan  
Owner/Operator/Partner F/V Karen Evich



**Submitted by:** Robert Gardiner

**Community of Residence:** Ketchikan

There should be zero trawl in state waters. We have seen the collapse of to many salmon runs.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Harlan Gates, and I work for the Prince William Sound Aquaculture Corporation (PWSAC).

If hatchery production is reduced, I could lose my job. It would create income instability and reduced access to fish. These proposals would also drive a loss of economic stability more broadly, and I am concerned about the economic impacts on hundreds of families who rely on fishing, processing, and related work for income. I am also concerned about the wildlife that depend on these fish.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Harlan Gates  
Paxson region, Alaska

[REDACTED]

**Submitted by:** Brian Gierard

**Community of Residence:** Ketchikan

171 opposition

172opposition

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Steven Gildnes, and I am a commercial seiner and commercial gillnetter in Area E of Prince William Sound, which includes the Copper River. I am also a rural subsistence user, an avid sport fisherman, and a third-generation Cordova community member. I fish aboard the F/V Cape Elrington (seine) and the F/V Cape Hinchinbrook (gillnet).

My grandpa immigrated from Norway to Cordova around 1930. Grandpa Pete raised silver fox on the islands in Prince William Sound during winter, dug razor clams in the spring, and fished salmon pulling nets by hand all summer.

A reduction in salmon hatchery production would reduce salmon availability to subsistence and sport use in Prince William Sound and across the state. Proposals 170, 171, and 172 would negatively impact my Cordova community through reduced harvest opportunities, fewer processing jobs, fewer seasonal workers in town buying goods and services, and rising taxes on fewer businesses to balance the budget. It would also increase pressure on wild salmon runs due to increased demand from sport and subsistence user groups.

Hatcheries have been releasing salmon fry into Prince William Sound my entire life. For 52 years, hatchery-released salmon fry in Prince William Sound have enhanced seabirds like puffins, Kittlitz's murrelet, marbled murrelet, and bald eagles, and mammals like Dall's porpoise, Steller sea lions, harbor seals, humpback whales, and sea otters whose home was destroyed by the Exxon Valdez oil spill. When the Exxon Valdez oil spill occurred in the spring of 1989, herring left the Sound, and the only bait fish available was hatchery-released salmon fry.

A back-up plan to enhance salmon is my biggest concern with an upsurging human population entering Prince William Sound, coming primarily from improved access through the railway and road/tunnel connections from Anchorage to Whittier.

I believe the biggest factor in the decline of salmon is human pressure across all user groups. In my opinion, fishing practices and increasing use of spawning areas are serious concerns, as are growing pinniped populations. I have spent every summer of my life on the Copper River Delta and in Prince William Sound, and I firmly believe Prince William Sound hatcheries enhance life in waters bordering our nation's second-largest national forest, the Chugach, and the sacred Copper River Delta, which was devastated by the Exxon Valdez oil spill. I firmly believe that without salmon hatcheries, these waters would be lifeless and suffering.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Steven Gildnes  
Cordova Ak, Alaska



**Submitted by:** Darin Gilman

**Community of Residence:** Cordova

187-Oppose

186- Oppose, Fish and Game have the ability to reduce time and area as is to ensure adequate Coho escapement.

175- I Support the mesh reduction to 3.5 inches in this proposal to ensure King Salmon that are incidentally caught in Dipnets Fisheries can be caught and released without injury to the fish.

170- Oppose

171-Oppose

172-Oppose

162- Support, I can't pay someone to use a fishwheel for subsistence access nor can I pay someone to guide me for subsistence fishing. Paying a guide for transport for subsistence fishing is a loophole that should be closed. It is wrong in the essence for a commercial operation to profit at the expense of a subsistence fisherman.

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Dear Chair and Members of the Board thank you for reading my comments on the proposals as follows.

Proposal 162 I SUPPORT and agree with the proposer that the intent and meaning of subsistence is being pushed further and further from original intent and meaning by the commercialized users capitalizing on this grey area to the detriment of the Statute itself. I know that the Dept and others will bring up the use and user and short history along with lack of opportunity to confuse the basic issue before you on this proposal. Please do not allow the distraction to keep you from passing this much needed regulation.

Proposals 170-172 I OPPOSE after researching the reasons the proposals were written as stated by the authors I believe they are inaccurate. One item I would like to bring forth is the benefit a predator buffer created by abundant hatchery pink and chum salmon fry brings to wild salmon stocks out migrating at the same time. Healthy wild stocks in the areas with hatchery production show this to be true. This same predator buffer also helps the millions of hatchery coho and king salmon smolts that are released each year. The straying worry once examined shows that the genetic adaptability of salmon and their natural straying tendencies along with the multi year spawning recruitments naturally weed out any introgression issues in the same way they do when wild salmon stray to establish new spawning populations.

Proposal 175 I SUPPORT. I have watched the Board talk and pass regulations recently to keep salmon, Especially KING salmon safer when they are released. The Personal Use Fisheries that have thousands upon thousands of releases of king salmon would greatly benefit the stocks they are releasing with this regulation passing. One would be from less damage to the individual fish that they are releasing when it is not allowed to be kept ie KING salmon, or they are releasing for another reason such as size or over the limit ie SOCKEYE or COHO salmon. The tightening of the rules on attaching a line to the handle would keep the new powerboat dip net industry from tying a line or two to different points on the dip net to allow it to become a trawl which further crowds and stresses fish that may need to be released. The regulation should be rewritten to be (24)subsection Personal Use Dipnets.. specifications..... as they are the major users in two rivers where they must release kings quite often.

Studies and regulatory analyses indicate that the use of monofilament and multifilament mesh in dip nets, particularly with larger mesh sizes, increases injuries and potential mortality for king salmon (Chinook salmon) by enhancing entanglement, fin damage, and scale loss. Compared to braided, inelastic mesh, monofilament nets are more injurious to salmon, sometimes taking up to ten minutes to release a fish, which causes high stress and potential mortality.

#### **Key Findings on Dip Net Material and Mesh Size**

- **Monofilament vs. Braided Mesh:** Monofilament nets, often constructed of gillnet material, cause higher entanglement rates for king salmon compared to braided, inelastic, or knotless mesh. (U.S Dept. of Interior.)
- **Mesh Size and Injury:** Studies show that larger dip net mesh sizes result in significantly higher rates of fin splits, fin damage, and scale loss in salmonids.
- **Injury Mechanisms:** Knotted mesh types are more damaging than knotless or rubber nets, contributing to mucous removal, scale loss, and increased risk of fungal infection.

Thank you for your time and efforts in your roles as Board Members. Shawn Gilman

- **Handling Time:** The tendency for king salmon to become entangled in monofilament mesh increases the time out of water, which is directly proportional to increased mortality rate.( U.S. Dept.of Interior)

**Submitted by:** Stafford Glashan

**Community of Residence:** Wasilla

I am a longtime valley resident (30+ years) and have sadly watched our Coho stocks dwindle. Coho season used to be the best part of the year and there were communities formed at the mouths of the rivers. I made many a friend that I only saw every August during Coho season. Our freezer was annually filled with local-caught cohos. About 10 years ago, my family quit harvesting Susinta drainage Coho's because we could see what was happening to the population. The last few years I have engaged with the local biologists to report what I am seeing in the rivers in the drainage and offer any volunteer help they can use. Its long past the time to just study the issue, we need actions! I am in support of Proposal 186.

**Submitted by:** Toni Godes

**Community of Residence:** Cordova

I am strongly opposed to proposals 170-172 for the reasons clearly laid out by Salmon Hatcheries for Alaska: "Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity."

**Submitted by:** Tim Gossett

**Community of Residence:** Kodiak

Tim Gossett

Box 1277



Chairman Carlson-Van Dort and Board Members,

My name is Tim Gossett.I have commercial fished for almost 50 years and have run my own vessel since 1987.I serve on the Board of Kodiak Seiners Association.I am writing in opposition to proposals 170-172.

I am very concerned that if adopted these proposals could have a real impact on our community and others like it across Alaska.Communities like ours already facing uncertain times with drastic budget cuts to its school system and infrastructure.

I am afraid the adoption of these proposals would be based on an assumption rather than science.We actually only have one hatchery on Kodiak that already operates near its margins.One hatchery with no planned expansion.One hatchery that in a year with a low prediction (like the upcoming 2026 season) helps our local economy with not only across the dock tax dollars but also jobs for the processors and



community,its local businesses (including sports fishermen) and its families....all based on an assumption.Its not worth it.

The arbitrary numbers (percentages) used are another concern.Where do they come from? Is there data to support them? Why 25% and not 10 or 2? Seems ambiguous and arbitrary.Its not worth it.Decisions that potentially have a profound affect on the states fishing economy and coastal communities should be grounded in science not assumptions.

Lastly,I would like to remind you of the benefit of our one hatchery and its ability to spread the fleet on the west side (Shelikof Strait),an area already under pressure from king salmon restrictions and minimal fishing time.It normally would support not only seiners and set netters but also subsistence fisherman from its villages,sports fisherman and the young fisherman just trying to make ends meet..It's benefits are immeasurable as is our one hatchery which is now being threatened,too.Where does it stop? It's not worth it.

I strongly urge you to vote no on proposals 170-172. Thank you for allowing me to comment.

Tim Gossett

Laguna Pacific Fisheries ,LLC

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Randy Gregg, and I have been an Alaskan fisherman for 40 years. I have been an Alaska resident for 57 years, and I served on the DIPAC hatchery board for 10 years. I was the owner of the F/V Patriot, which was homeported in Juneau, Alaska for 27 years, and I fished for salmon in Southeast Alaska and Prince William Sound for 30 years in the summertime.

Hatchery production has been a large portion of my income and business, and it provides stability for small communities. Hatcheries create jobs all over Alaska, including in fishing, processing, and tourism sectors.

If these proposals are passed, communities across Southeast Alaska and Southcentral will be devastated, with fewer fishing jobs, fewer processing jobs, and fewer resources supporting the tourism industry.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is John Grocott, and I am a longtime commercial fisherman and community member of Cordova, Alaska. I fish aboard the F/V C-Runner.

If these proposals pass, it would be the end of my Prince William Sound fishery. It would no longer be economically viable to continue. The current fleet was built for hatchery harvests and cannot survive on a limited wild stock fishery alone.

Cordova is now heavily dependent on a salmon-based economy. Weak runs have already reduced processing activity in town this year. I believe the loss of the hatchery program would lead to severe economic decline for the community.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

**Submitted by:** Finn Gross

**Community of Residence:** Girdwood, Alaska

Good afternoon,

My name is Finn Gross. I have been a crew member in commercial gillnet fisheries for the past 7 seasons between Prince William sound and the copper river, all the way down to the US Canadian border, and I will be running my own operation this coming season. Here are my thoughts on the following proposals.

Proposal 170: I oppose proposal 170

If this proposal were to pass, I would see a large economic loss not just in chum which is my target species but overall fishing opportunity as well. This is due to the fact that PWSAC will require an increased amount of fish to compensate for the lost production. For gillnetting in southern southeast I will see a potential loss of nakat inlet chum production since it's a terminal harvest area. If that were to happen it would put much more pressure on wild runs and add tensions to the salmon treaty between the US and Canada.

Proposal 171: I oppose proposal 171

This proposal would negatively impact my fishing operations due to the fact that it will put a large financial impact on PWSAC which will in turn result in them taking more fish for cost recovery once again limiting common property fishing time and area.

Proposal 172: I oppose proposal 172

This proposal will limit future hatchery production increase, negativity affecting the commercial fishing industries for salmon in southeast Alaska, Prince William sound, and Kodiak areas.

I support Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear:

I support Proposal 165 – Require salmon excluders for pelagic trawl gear,;

I support Proposal 174 – Seine vessel/skiff engine operation requirements,;

I support Proposal 175 – Dipnet mesh and configuration requirements: ,

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish,;

Thank you for your time,

Finn Gross

**Submitted by:** Geoff Gross

**Community of Residence:** Girdwood, AK

Good afternoon,

My name is Geoff Gross. I am a commercial fisherman in the Area E gillnet fishery I have been involved with this fishery for 16 years. Before that, I was a deckhand on a longliner for 2 seasons. Below are my opinions on the following proposals.

Proposal 170: I oppose proposal 170. It will affect my gross income, hatchery will reduce open area and time in common property fishing areas.

Proposal 171: I oppose proposal 171. This will impact me due to more fish being needed for cost recovery efforts. like chum from WNH and Sockeye from main bay hatcheries. Limiting common property fishing time and area allowed.

Proposal 172: I oppose proposal 172. This proposal will affect future fishing opportunities and conflict with our current science based management regarding hatchery increases in production.

I support Proposal 174 – Seine vessel/skiff engine operation requirements.

I support Proposal 175 – Dipnet mesh and configuration requirements.

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish.

Thank you for your time,

Geoff Gross

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**PC191**

**Submitted by:** Carrie Grove

**Community of Residence:** Palmer

No trawling within 3 miles of Alaska shoreline.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Mark Hazeltine, and I am a commercial fisherman, sport fisherman, community member, lifelong Alaskan, and environmentalist based in Anchorage, Alaska.

Reduced hatchery production in Prince William Sound would directly affect my bottom line in a fishery that is already struggling. It would harm the commercial fleet and the local small businesses that support the fishery.

Long-term sustainability is the most important goal when it comes to our salmon runs, and I support science-based management that will perpetuate our fish stocks. Making decisions based on speculation sets a dangerous precedent. Managing our fisheries in this way would lead to poorly managed runs and create opportunities for special interest groups to exert influence over fisheries management.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Mark Hazeltine  
Anchorage, Alaska



**Submitted by:** Aidan Hall

**Community of Residence:** homer

My name is Aidan Hall. I am a charter captain in Homer. I am writing in support of Proposal 176. I am firmly of the belief that a cumulative bag limit on saltwater boats would be the single most effective conservation efforts we could make without adding restriction. The beauty of this proposal is that it would conserve fish without negatively effecting the experience of the anglers and in many cases improve it.

Because of current bag limit regulations, on a daily basis I am required to release injured fish (often to the dismay of my clients) that another angler on board would be happy to or even requested to keep for themselves because the angler who caught it already possessed their limit of that species or because it was not in the size slot they needed in order to fill their bag limit. This type of release, though legal, feels unethical and wears on me as I believe the wellbeing of the fish we target should be a primary concern to us. Our regulations ought to facilitate our ability to protect them not erode it. A cumulative bag limit would allow us to bring home the same number of fish we already do while impacting far fewer fish per day to get them. This would prevent so much inadvertent waste.

It would improve angler experience as well because they would be more likely to go home with the fish they want and they would interface with fishing regulation that feels like conservation of the resource not criminal law. Many anglers on a boat together don't care who caught what. People are generally pretty generous on a fishing boat. They want to have fun, catch fish, and they want to bring some home. There aren't many who would rather see a big yelloweye with obvious barometric damage (caught accidentally by someone limited on rockfish who is fishing for halibut next to them) deep water released than take it for their own limit. I know this because they usually ask to keep it and I am left to step in and act as law enforcement and tell them they cannot share and we have to deep water release it and hope that it recovers. Their response is typically appalled.

Proposal 176 is a meaningful conservation measure that would be met with support by the anglers and aligns with their preexisting behavior. By allowing people to follow their natural inclination to share, we can reduce our impact on the fish populations we all want to preserve and enjoy.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Michael Hand. I am a seiner from Prince William Sound and fish aboard the F/V Seaview.

A hatchery reduction would push me to fish elsewhere in the state and potentially abandon salmon fishing in Prince William Sound. Cordova relies on a stable salmon fishery to survive, and reducing hatchery production would increase instability for fishermen, processors, and the broader community.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Michael Hand  
Cordova, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nelly Hand, and I am a commercial fisherman based in Alaska. I fish aboard the F/V Heron.

These proposals would directly affect my income stability, job security, access to fish, business viability, family livelihood, and operational planning. My community would also be affected through reduced harvest opportunity, fewer processing jobs, loss of economic stability, reduced food availability, and ripple effects to local businesses.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Nelly Hand  
Alaska

[REDACTED]

**Submitted by:** Elias Hanson

**Community of Residence:** Cordova, Ak

My name is Elias Hanson.

I grew up fishing PWS and Copper River with my dad, and I have had my own gillnet operation for the last 4 years.

I oppose proposal 170. It would make it significantly less appealing for younger generation to buy in to fishery

I oppose proposal 187. The fishery would be exposed to open gulf with no protection from weather and seas during harsh fall time weather patterns when fishery is fished.

I support Proposal 164, Proposal 165, Proposal 175, and Proposal 180.

Thank you,

Elias Hanson

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Caedmon Harper. I am a commercial fisherman in the Kodiak Island Borough and fish aboard the F/V Independence.

These proposals would mean loss of revenue and livelihood due to lack of fish. Reduced harvest opportunity would create fewer processing jobs, loss of economic stability, reduced food availability, and ripple effects to local businesses. It would also negatively affect the industry and community for no demonstrated reason, especially while other factors such as trawling and sport fishing impacts remain major concerns.

I also worry about the cultural and heritage impacts these changes could have on Alaska Native families and communities connected to these fisheries.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Caedmon Harper  
Kodiak Island Borough, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ty Harper. I am a subsistence and sport fisherman and a community member in the Kodiak Island Borough.

My friends and family have fished these waters for 65 years, starting with my wife's parents in the early 1960s. We have seen the financial safety net that hatchery salmon provides when annual runs are low.

Kodiak runs on fish. Less fish means less work, more financial pressure on families, and harder conditions across the community. Passing non-science-based decisions would set a damaging precedent, shifting Alaska away from slow, steady, science-led fisheries management.

Recently, a trawler bycatch event shut down King fishing for the season. Increasing bycatch will not help. We should focus on meaningful bycatch controls rather than broad hatchery cuts.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Ty Harper

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Bill Hartley, and I am a sport fisherman, salmon charter guide, and subsistence user in Alaska. I operate Lucky Strike 2 Charters.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The salmon I catch for myself and my guests would be sharply reduced, which would affect my income directly. I would lose access to fish for my family and my guests, and it would have a negative impact on our business viability.

The local canneries are already closing earlier than in the past because of low fish numbers. My family relies on the salmon I am able to provide. From the fishermen, to the cannery workers, to my charter guests, to my family — all would suffer irreparable harm.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Bill Hartley  
Alaska



PC200

**Submitted by:** Arne Hatch

**Community of Residence:** Seward, AK

As a lifelong resident of this state, I have seen the incredible benefits that salmon hatcheries have achieved for all user groups for more than a generation. I oppose adoption of proposals 170, 171 and 172 in any form. These proposals call for arbitrary actions affecting hatchery production without acceptable peer-reviewed scientific justification.

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PC201

**Submitted by:** Billy Hayden

**Community of Residence:** HOMER

I AM STRONGLY OPPOSED TO PROPOSAL 183 AS WRITTEN. THIS WOULD REQUIRE ANGLERS TO RETAIN CARCASSES OF ALL SPECIES (OUTSIDE THOSE THAT CAN BE USED FOR BAIT) . IF EVERY RECREATIONAL AND CHARTER ANGLER ARE REQUIRED TO RETAIN AT A MINIMUM WHOLE CARCASSES WHEN RETURNING TO THE HARBOR THAT WILL CREATE A HUGE PROBLEM FOR THE HOMER HARBORMASTER AND CITY WORKS. THERE IS ALREADY NOT ENOUGH CARCASS BINS ON THE SPIT. THIS WOULD INCREASE CARCASS LITTER IN OUR HARBOR AS WELL. I RECOMMEND THE LANGUAGE OF PROP 183 BE CHANGED TO BETTER REFLECT THE INTENT OF ADFG. IF THE GOAL IS DATA COLLECTION I WOULD LIKE TO BRING UP THAT THERE IS ONLY 1 ADFG PORT SAMPLER FOR THE INTIRE HOMER HARBOR.

THANKS

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PC201

**Submitted by:** Billy Hayden

**Community of Residence:** Homer

I am in support of proposal 176. I feel the intent of this proposal is misunderstood. The intent is to reduce release mortality. The charter fleet has size restrictions on several species of fish. We are forced by current regulation to release damaged fish based on an individual bag limit that could be retained under a cumulative bag limit. Used in this way proposal 176 is a conservation measure as well as a method to reduce wastage in our fishery. I would also mention that 5 ACC 75.995(a)(4) which defines "bag limit" applies to all anglers and not just fishermen on a chartered vessel. Thanks

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PC202

**Submitted by:** Daniel Hayden

**Community of Residence:** Homer

I support proposal 176. As I guide, I often find myself releasing damaged and injured fish for fishermen that other fishermen would be happy to take. I think that this proposal would at least make it possible to retain these injured fish towards others bag limits. With the implementation of size limits, we have had to catch and release many more fish than in the past and I think it's time to change this law to accommodate the ever changing fishery.

I oppose proposal 183. I don't think Homer has the infrastructure to handle every fish carcass that is harvested each day. It would also be terribly inconvenient to keep whole fish and/or all carcasses onboard until docking. I also don't see the benefit of this proposal. If it is for law enforcement, then species should be easily identified with the laws in place now. If it is for research, then I would recommend having more than one port sampler before creating this huge mess that is proposed.

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**PC203**

**Submitted by:** Ole Haynes  
SE SEINER.

**Community of Residence:** Ketchikan

As a 4th generation, born and raised, lifelong Alaskan, for the sustainability of my family and salmon fishing livelihood, we strongly oppose proposals 170,171 and 172. The survival and livelihood of my family, of which my 4 sons fish onboard my SE salmon seiner, we **DEPEND** heavily (AT LEAST 50-75%) upon the chum hatcheries for survival and living. We strongly oppose proposals 170,171 and 172. Thank you very much for listening and caring about your fellow Alaskan families and communities. Sincerely, Ole Haynes family.

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*F/V Evie Grace ~ Evie Grace Fisheries LLC*  
*F/V Pacific Star ~ PacStar, Inc.*



March 2, 2026

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Anchorage, AK 99811-5526

**RE: Oppose Proposal 11; Proposals 163, 164, 165; Proposals 170, 171, 172**

Dear Chairwoman Carlson-Van-Dort and Board Members,

For 47 years, we have chosen Kodiak as our home, raising our four children here while owning several trawl and longline vessels over the years. Currently, our family owns and actively fishes two 79' vessels in Federal and State waters. Our son, daughters and grandchildren are also active participants in these endeavors. My father and grandfather Bristol Bay salmon fishers; as a family, we've also spent several years as part of a setnet crew in beautiful Moser/Olga Bay. I have owned a Kodiak tanner permit for several years. We currently tender salmon in PWS, SE Alaska and Bristol Bay -wherever needed. We realize and appreciate the importance of salmon to Alaska and to our operating plan.

For at least 10 months of the year, our crew of about 10-15 individuals work hard to be successful. Over the last 20 years, the Pacific Star has employed 98 fishers with 87 of them being Alaskan residents. Over those years they have supported about 350 family members who in turn support and contribute to our Kodiak and Alaskan communities.

**I am strongly opposed to proposals 11, 163-165 and 170-172**

For some of the reasons listed below, I am opposed to Proposal 11 which is seeking to close state water fisheries in the Adak area to Trawl. Fishing within three nautical miles of Adak is imperative to the safety of the vessels in this fishery. Closing these waters on non-science-based information and emotions is a scare tactic that impedes progress and knowledge in all fisheries.

Proposals 163-165

During A season, we choose to fish in PWS to avoid salmon and to ensure the fishery is maintained in a sustainable manner. When fishing around Kodiak, staying inside three nautical miles of Kodiak is important to us to avoid weather, keeping the crew safe while being close to town, using less fuel.



*Continued Comments to Board of Fish RE: Proposal 11, Proposals 163-165, Proposals 170-172*

Proposals 163-165 are outside the Board's authority as written and not developed by informed stakeholders, creating a significant expense for the State. Trawl fishing occurs in less than 1% of all state waters. In the Gulf of Alaska where we operate, if we're fishing on the bottom in rocky habitat our nets are shredded. Needless to say, the cost of one cod-end and net tore up on rough bottom is an unproductive way to operate and should be avoided at all costs.

We are invested in improving monitoring and our understanding of how trawl gear operates. We have participated in Trawl Electronic Monitoring since 2020 with cameras on for 100% of my pelagic pollock trips. We are also voluntarily participating in the Gear Innovative Initiative, where researchers from Alaska Pacific University are using our net plans, specifications of all aspects of our pelagic trawl gear and information collected in interviews about how we fish the gear to model exactly how the gear functions in the water column, which will eventually be compared to field trials. This will update our current estimates of bottom contact which are only educated guesses right now, to accurate data points based on scientific evidence. This work is also incorporated into the North Pacific Fishery Management Council's process, will be peer-reviewed by their Science and Statistical committee and used to update the Fishing Effects model in the Essential Fish Habitat 5-year review required under the MSA. *All of this work is part of a public and transparent process that our fishery has embraced for more education and to keep our fishery sustainable.*

While I oppose Proposal 165 because it is outside of the Board's authority and because the State lacks a mechanism for monitoring and enforcing exclude use, I already use a salmon excluder when fishing. I have been a strong proponent of excluders for more than 20 years and have made prototypes for trial-and-error testing over the years.

Proposals 170, 171, and 172 are misguided and a threat to our coastal communities that rely on salmon fisheries. Hatchery permitting and scientific oversight should stay with ADF&G, who are the experts in managing towards our salmon policies.

We depend on the accuracy of managing the salmon fishery to move forward with our business model. As a Board, it is your responsibility to ensure that all Alaskans continue to benefit; please don't take action that threatens that.

**Please do not act on Proposal 11, Proposals 163-165 and Proposals 171-172.**

Thank you for the opportunity to comment.

*Kent Helligso*

Kent Helligso, owner

*Colleen Helligso*

Colleen Helligso, owner

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Anchorage, AK 99811-5526

Re: Oppose Proposals 11,163,164 and 165 (trawl)

Support Proposals 166,167,168 (jig)

Dear Chairwoman Carlson-Van Dort and Board Members,

Hello my name is Mike Helligso. I am a life long Kodiak resident and commercial/subsistence/sport fisherman. I started commercial fishing at an early age, in the 90s and have participated in various state and federal Alaskan fisheries through the years including trawl fisheries, salmon, crab and halibut. I love living, working and raising our kids in Alaska, especially in a small tight knit coastal community. Kodiak, like many coastal towns depends on a healthy fishing industry and I've always taken pride in not just being a positive contributor to the community but also making sure future generations of fishers have the opportunities I did.

Proposals 11,163,164 & 165

I'm writing in opposition of these proposals as they were developed by uninformed folks, based on speculation and with no outreach to stakeholders in the industry for validation. Trawl fishing occurs in less than 1% of state waters with the majority of that done by pelagic pollock fisheries. Very little non pelagic trawling is done in state waters and accounts for minimal impact. Out by Adak the bottom trawl cod fishery got Adak on the map as a legitimate processing market that would not have happened otherwise. In SE a handful of small vessels trawl for shrimp, that go into local markets and have no adverse issues on habitat or marine stocks.

Pollock fishing in state waters is essential to the communities of Kodiak and Sand Point. They also supported the communities Cordova, Seward and King Cove. Besides having the PWS pollock fishery, quite a bit of the federal pollock take happens inside state waters which is critical for keeping our coastal communities going. These proposals cite reports made to the NPFMC that stated that pelagic gear makes quite a bit of contact with the bottom. What they don't mention is that those studies were mainly in the bearing sea and that amount of bottom contact doesn't apply to the Gulf. Pollock fishing in the Gulf is vastly different compared to out west. I remember when Salmon State tried arguing at the '24 BOF meetings in Cordova that pelagic trawls in the Gulf were on the bottom 0-35% of the time but it was pointed out that what that study showed was that 0-35% of the pelagic gear makes contact with the bottom when contact is made...not how much time is spent on the bottom. Studies are good info but must be represent in the correct context to come to accurate conclusions....misrepresentation of analysis is disingenuous. The Gulf waters are vastly deeper and more rugged with fish behaving to them accordingly. The same is true for inside state waters in the Gulf. Pollock don't like to go very deep and are very much up in the midwater in the Gulf. Deep waters and rugged terrain make it challenging to catch fish up in the water column and down right implausible to successfully catch fish on the bottom with pelagic gear. I'd say that pelagic gear makes contact with the bottom in the Gulf under 5% of the time. I'm grateful the Alaska Pacific University is undertaking the highly involved study of examining pelagic trawl gear, how it's being used and

the impacts it may have throughout the state. I look forward to having that information available so folks can have good data to look at and work with. Studies show that pollock in state waters feed quite a bit on juvenile salmon smolts leaving the rivers and beginning their journeys in the ocean. People have seen and testified that removing pollock from areas where salmon smolts empty in the sea are a good thing for salmon runs.

Even disregarding the process and finances of setting up and enforcing bottom contact verification by the state for trawl fisheries for say bottom contact sensors, the accuracy of the reporting varies wildly and is by no means fool proof. These sensors are not widely used in the US but in international fisheries with vendors stating that bottom contact affirmation or lack there of is subjective and not linear with what is always happening with the trawls.

Unlike what is stated in the proposal, bycatch caps do standardize enforceable protections for salmon stocks. The state has no mandated genetic testing for salmon caught in trawl fisheries to verify claims that salmon bycatch is mostly small out of state/county hatchery fish. All trawlers have salmon excluders but performance is not static across all designs and is specifically unique to individual vessels. While there are various designs, performance is not just based on the make and model but also vessel and gear configuration. Water flow through excluders is a critical factor in bycatch to target species escapement ratio. Many folks have modified their excluders for optimal performance due to vessel size, gear configuration and fishing depths. Having a concrete definition may not optimize and perhaps hinder performance.

Proposals 166,167,168

The jig fishery is a very special fishery for the small time operators that rely on it. For many it's the only income they have before the summer months. A lot of the vessels are not big enough to safely participate in other fisheries this time of year. The jig fishery has gotten more participation from outside vessels, vessels that do participate in other fisheries and have made some money before getting into jig. Suspicious gear configurations along with reported sightings and landing details have led to us to where these proposals are becoming necessary to confirm the fishery is on a level playing field. Heck I'm not even involved in the jig fishery and the landings and behavior I've seen that are reported as 'jig' do not fall in line with the parameters of what legitimate jig operations produce. I support the definitions in these proposals to help curtail the recent shenanigans that are directly effecting small time local operators.

In closing I feel that it is very important to have collaboration and conversations on issues effecting our state and the people in it but these proposals (163-165) were made by people, based not on merit but emotion, with a certain unawareness for the particulars of the fishery. I would like to see all fisheries thrive for generations and knocking down successful, sustainable ones that also benefit other fisheries isn't the way.

Thank you for you time.

Sincerely,

Mike Helligso

**Submitted by:** Ron Henry

**Community of Residence:** Ketchikan

Seiner for 50 years

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is James Herbert, and I am a retired commercial fisherman and local business owner. I am also a sport fisherman and personal use harvester based in Homer and Southcentral Alaska. I fished aboard the FV Kingfisher III.

I am retired now, but I had a meaningful career as a commercial salmon fisherman in various parts of the state. Without the stabilizing effect of hatcheries, I feel my financial success would have been much more uncertain. Different regions depend more or less on hatchery fish, but hatcheries are a vital part of economic stability for the salmon industry. I want current and future fishermen and women to have a viable livelihood, and I see hatcheries as part of that vision.

Many of my friends and neighbors are commercial fishermen in Prince William Sound, Kodiak, and lower Cook Inlet. Their contributions to the local economy are significant and are linked in part to stable salmon fisheries facilitated by hatcheries. Tourism is also dependent on these fish to enhance wild runs.

I believe in science to make decisions. The natural world is a complex system, and it is difficult to parse out cause and effect. While salmon are among the best monitored species, what happens to them in the open ocean is still uncertain. When biologists make predictions, there are no guarantees, which is why we see boom or bust years with both hatchery and natural returns. Good science takes time and money, and it should not be supplanted with irrational arguments and bogus theories.

In our current political climate, powerful interests often act without considering consequences to people, the economy, and trust in the process. Though I tend to be an impatient person, I believe in deliberative processes. We must trust decision makers to follow the rules and procedures.

The world we live in in 2026 is very different from the one I started fishing in in 1971. I am distressed by the lack of attention to humanity's negative effects on global temperatures and habitat loss. Alaska is blessed with many positives that make quality seafood available to the nation. Ultimately, some problems that plague the Yukon and Kuskokwim Rivers may come to other regions. We need science to understand and anticipate these effects.

Salmon hatcheries are a small part of the larger salmon and commercial and sportfishing industry, but they provide stability, offer predictability, and help sustain fishing and local economies. We need them.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

JAMES HERBERT  
Homer/south central AK, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Cale Herschleb, and I am a salmon seine fisherman based in Cordova, Alaska. I fish aboard the F/V Celtic Lady.

I grew up seining on my dad's boat and have had my own boat for 15 years. My children are just reaching the age where they can go out on the boat. If hatchery production were to go away, my kids would lose the opportunity to continue our way of life, and my boat and permit, which are the only assets I own free and clear, would lose much of their value. My income would drop dramatically, and I would be forced to uproot our family of five to seek employment and a lower cost of living.

Our town of Cordova is already suffering from budget shortfalls from a 2024 pink salmon disaster. If the hatcheries stop producing fish, this remote community would likely suffer severe economic decline. Racing ahead of the science is never a good idea. A plan to reduce hatchery output without a plan to buy back permits and/or boats would invite serious legal and economic consequences for fishermen and communities invested in this industry.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Cale Herschleb  
Cordova, Alaska





**Submitted by:** Nancy Hillstrand

**Community of Residence:** Kachemak Bay

PROPOSAL 171 – 5 AAC 40.XXX New Regulation.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO?

Proposal 171 Create a Policy for Reasonable Segregation required in the PNP Hatchery Act.

This regulatory mechanism using Chapter 39 allows opportunity to fulfill the mandated regulatory “Policy of Reasonable Segregation” asked for in the original PNP Hatchery Act. This policy will align ADFG and hatchery operators mandated responsibility that “hatchery programs 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.”

This overlooked yet mandated Policy of Reasonable Segregation was asked for 50 years ago. PWS hatchery fish inter-regionally straying from 250 miles of release into Lower Cook Inlet has been brought before the board many times since 2017. Documentation in 2014 of magnitude 88% PWS Inter-regional straying into a significant stock called Barabara Creek is not condoned in the Genetics Policy. When monitoring occurs, straying is found. This is evident not only in Lower Cook Inlet but now in SEAKs Northern Outside District, resulting in stocks of concern. A structured mechanism to provide Action plans and implementation is needed to remedy recognized detrimental effects of straying on wild stocks and to fulfill the legislative mandate for hatcheries to operate without adversely affecting natural stocks of fish and under a policy of reasonable segregation.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The policy of reasonable segregation elevates management to a higher standard giving structure for ADFG and the board to proudly manage for “...utilization, development, and conservation of all natural resources belonging to the State.” Taking action to create this mandated Policy brings consistency with Alaska’s specific statutes, regulations, and policies designed specifically to protect our natural resources belonging to the State.

Creating a structured policy will break the nasty habit of denial and kicking the can down the road on hatchery straying using the weight of science and best available information.

Presently the straying problem has no management, no protection for wild fish from straying, just turning the blind eye to an adverse effect resulting in stocks of concern as seen in the NSEO District Chum Status Report and Action Plan submitted to the BOF January 2025. Before more damage is allowed to continue a policy can begin to address this long overdue problem brings consistency aligned with the Alaska constitution

WHAT COULD BE INCLUDED IN A POLICY OF REASONABLE SEGREGATION

It would consider the best interest of all 700,000 Alaskan public stakeholders of the wild fish resources. It would create the mandated policy of reasonable segregation based on defensible best available information giving structure to sustainably manage salmon using the sustainable salmon policy directives and the precautionary approach.

A Policy of reasonable Segregation can include:

1. clear definition of scientifically defended reasonable proportions of hatchery strays permitted to segregate in wild systems proven to not adversely affect wild fish.
2. Clearly define what hatchery proportions are unreasonable adversely affecting wild fish requiring hatchery operator action.

3. Require Hatcheries to pay for annual assessment of the extent of PWS hatchery-produced pink salmon present in Cook Inlet streams. Without monitoring, the condition of otolith marking fry has no efficacy.
4. Hatchery permits are "subject to the restrictions imposed by statute or regulation." AS 16.10.400(a).
5. Require otolith reading in an independent lab;
6. hatchery operators required to defend proof of no harm on any proportions above 2% hatchery strays found in wild river systems;
7. hatchery operators will detail what best available information or fish culture remedy is recommended to halt unreasonable proportions of their hatchery fish in wild river systems.
8. Hatchery operators will implement an Action Plan with goals and alternatives that aligns with the best available information and the precautionary approach to provide protection of wild fish until these proportions are brought back in check to what is considered reasonable segregation as defined.

WHAT ARE THE CURRENT REGULATIONS AND POLICIES GOVERNING PROTECTION OF WILD FISH FROM HATCHERY PERMITS AND STRAYING?

<https://www.akleg.gov/basis/statutes.asp#16.05.730>

Sec. 16.05.730. Management of wild and enhanced stocks of fish. (a) Fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks.

Sec. 16.10.440. Regulations relating to released fish.

Sec 16.05.251 Board of Fisheries Regulations

(7) watershed and habitat improvement, and management, conservation, protection, use, disposal, propagation, and stocking of fish;

(8) investigating and determining the extent and effect of disease, predation, and competition among fish in the state, exercising control measures considered necessary to the resources of the state;

(9) prohibiting and regulating the live capture, possession, transport, or release of native or exotic fish or their eggs;

(12) regulating commercial, sport, guided sport, subsistence, and personal use fishing as needed for the conservation, development, and utilization of fisheries;

5 AAC 39.220. Policy for the management of mixed stock salmon fisheries.

5 AAC 39.222. Policy for the management of sustainable salmon fisheries.

5 AAC 39.223. Policy for statewide salmon escapement goals.

"5 AAC 39.224 Policy for reasonable segregation"

<http://www.adfg.alaska.gov/FedAidPDFs/FRED.GeneticsPolicy.1985.pdf>

Alaska Department of Fish & Game GENETIC POLICY

Page 1 POLICY STATEMENT on I. Stock transport:

A. Inter-regional: Stocks will not be transported between major geographic areas: Southeast, Kodiak Island, Prince William Sound, Cook Inlet, Bristol Bay, AYK and Interior.

Page 2 - II. PROTECTION OF WILD STOCKS

A. Gene flow from hatchery fish straying and intermingling with wild stocks may have

significant detrimental effects on wild stocks. First priority will be given to protection of wild stocks from possible harmful interactions with introduced stocks. Stocks cannot be introduced to sites where the introduced stock may have significant interaction or impact on significant or unique wild stocks.

The precautionary approach is warranted.

Thank you for your attention

Sincerely

Nancy Hillstrand



**PROPOSAL 171 – 5 AAC 40.XXX New Regulation.**

**PROPOSED BY: Kenai River Sportfishing Association.**

**WHAT WOULD THE PROPOSAL DO?**

**Proposal 171** Creates a mechanism under Chapter 39 for opportunity to fulfill the mandated regulatory “Policy of Reasonable Segregation asked for in the original PNP Hatchery Act. This policy will align ADFG and hatchery operators mandated responsibility that “hatchery programs 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.”

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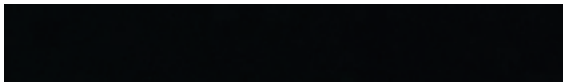
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The precautionary approach is warranted.

Thank you for your attention

Sincerely

Nancy Hillstrand



## Comments on Proposal #11 for the March 2026 Statewide Board Meeting

My name is John Hilsinger. I live in Anchorage Alaska. I retired from ADF&G in 2010 after 38 years doing research and management of shellfish, groundfish, salmon, and herring all over Alaska. My last four years with the department were spent as the statewide Director of Commercial Fisheries Division. Since 2013, I have worked as a consultant advising golden king crab fishermen in the Aleutian Islands.

I am writing in support of Proposal #11, which would close groundfish trawling inside state waters west of 170° W. long in the Aleutian Islands. This proposal is primarily designed to protect golden king crab habitat from factory trawlers. In recent years, these vessels have increased their activity on golden king crab habitat, including areas where females and sub-legal crab are concentrated. Fishing by these vessels in golden king crab areas has increased since the relaxation of closures aimed at protecting Steller sea lions and is concurrent with substantial declines in the health of the golden king crab stock. After decades of stable harvest levels, the golden king crab stock in the western Aleutians (WAG) area has declined dramatically.

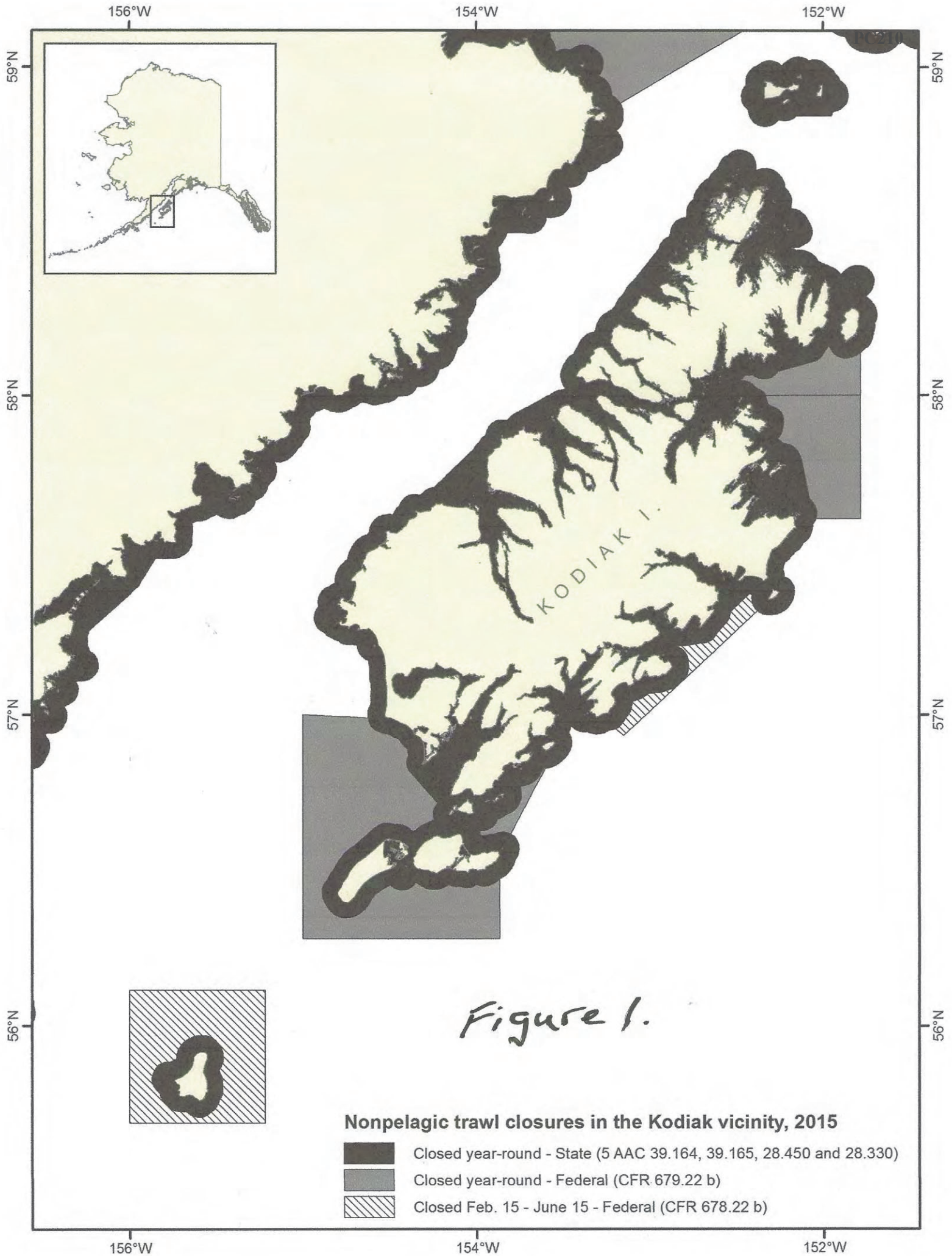
Habitat concerns have been brought to the attention of the North Pacific Fishery Management Council (NPFMC) Crab Plan Team (CPT) and Scientific & Statistical Committee (SSC). Trawl restrictions to protect Steller sea lions are very complex, but appear to have gone into effect in about 1991 and were relaxed in 2014. In September 2016, the Aleutian King Crab Research Foundation presented information to the CPT demonstrating that intensive trawling was occurring in areas where 88% of the golden king crab were being caught. The CPT recommended full analysis to understand the causes of reduced king crab catch rates, and whether changes in catch rates could negatively impact stock assessment. Further they recommended the analysis account for impacts to habitat as well as bycatch of golden king crab. It was recommended this work be done as a component or extension of the Essential Fish Habitat analysis. Last year, the SSC has also recommended the need for this research following testimony expressing concern about the dramatic decline in golden king crab in the WAG and the impacts to crab behavior following trawling in an area. An important question is what does trawling do to golden king crab prey species. Golden king crab eat a wide assortment of marine life including worms, clams, mussels, snails, brittle stars, sea stars, sea urchins, sand dollars, barnacles, crabs, other crustaceans, fish parts, sponges, and algae. All these species have limited ability to protect themselves from trawls.

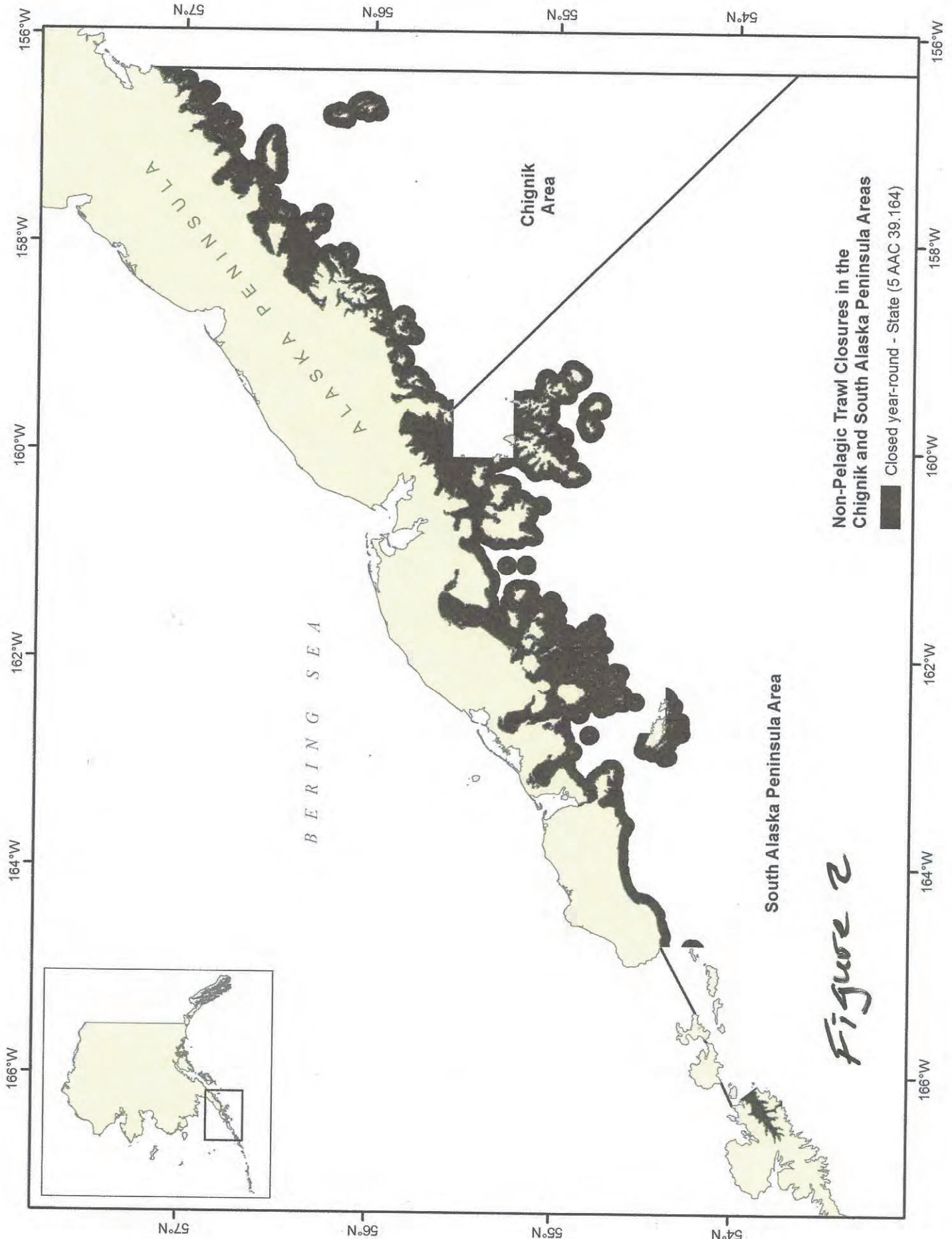
We know that trawling continues to occur on prime golden king crab habitat because trawlers are pre-empting prime golden king crab fishing grounds and causing loss of crab gear. There are also concerns for habitat occupied by female and sublegal male golden crab, which inhabit different grounds from the legal males. The NPFMC 's number two research priority is to quantify the impacts of fishing gear on crab and their associated benthic habitat. Priority seven is to better understand spatial distribution, habitat requirements, and movement of crabs relative to life history events and fishing

These are not simple issues to address. A major problem with acquiring information on adverse impacts to golden king crab areas is that the activity is taking place in very remote areas and extremely deep water and there is little documentation regarding the destructive nature of a trawl being dragged across golden king crab habitat. Given the significant decline in golden king crab stocks in the WAG area, it is imperative to exercise caution and be conservative in managing trawl gear until research demonstrates trawling can be done safely and without conflicts with pre-existing fixed gear.



This issue has already been addressed for much of state waters. As shown in the attached charts, all the state waters around Kodiak Island are currently closed to non-pelagic trawls (Figure 1) as are the waters of the Chignik and South Peninsula areas (Figure 2), and the waters of the Bristol Bay and Bering Sea coast (Figure 3). The Aleutian Islands state waters area should be brought under the same protection.





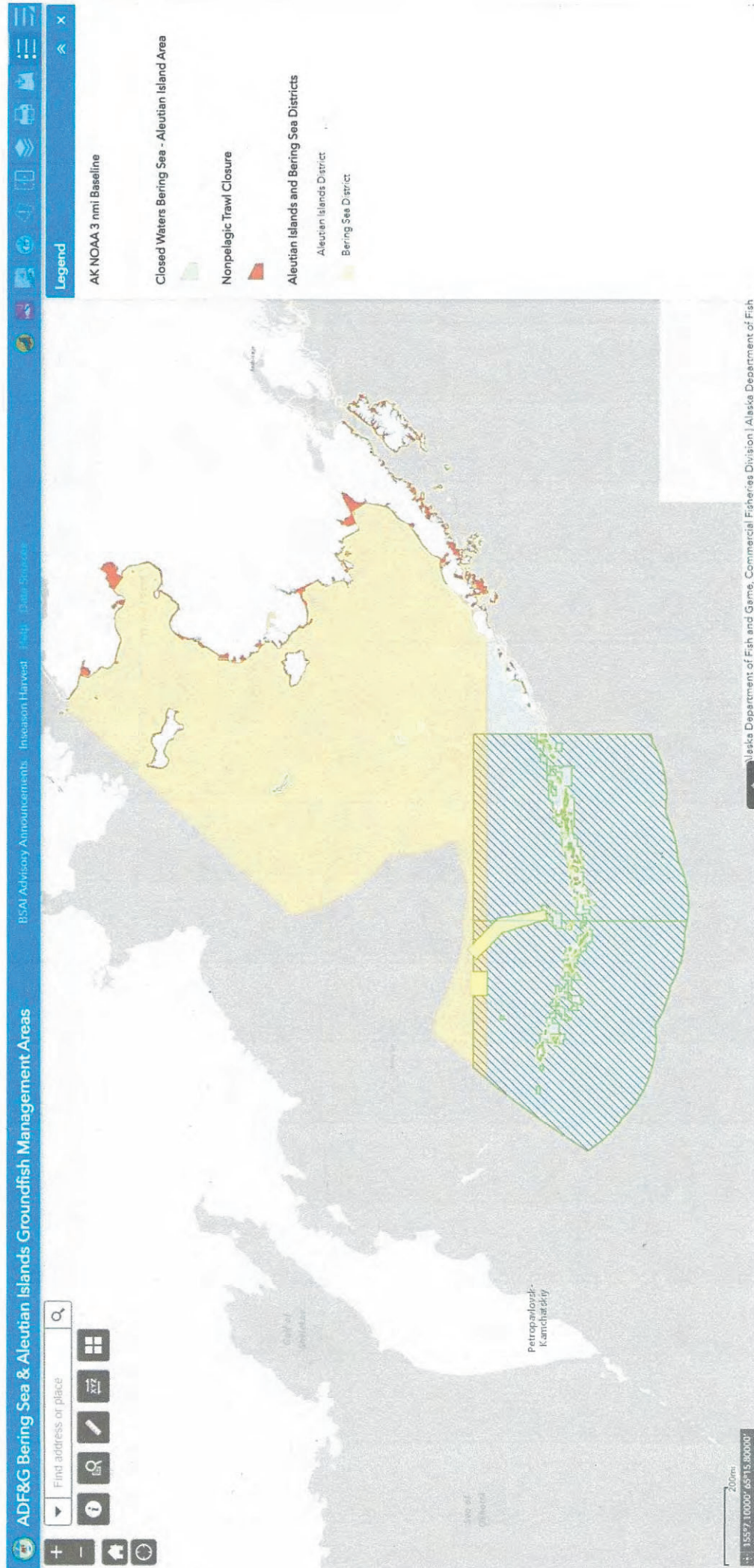


Figure 3

**Submitted by:** David Hilty

**Community of Residence:** Kodiak

Re: OPPOSITION to Proposals 170,171,172 (Pink and Chum Hatchery Cuts)

Dear Chair Carlson-Van Dort and Members of the Board.

My name is David Hilty, I have been a resident of Kodiak for the past 50 years.

I OPPOSE Proposals 170,171,172.

If a 25% reduction of egg take and production is implemented it could effectively financially bankrupt many of the salmon hatcheries in the state. These hatcheries operate on very thin margins and with today's increased costs they depend largely on cost recovery fishing for a large portion of their income to balance their books. It would drastically reduce the amount of fish available to common property fishing.

I fear that if any reduction of hatchery production is approved that there will be a cascading effect on our already declining coastal communities. Less fish coming across our docks affects fishermen, process workers and plants, the cost of electricity, groceries, housing, education and much more affecting every resident. Coastal communities, where these hatcheries operate, are struggling to survive and can not afford the financial impact of these proposals.

Regarding Proposal 171, I believe that pink salmon straying is something that should be accepted as a natural safeguard of our rivers. As a pilot I have seen from the air, small river salmon runs decimated by dry summer droughts or landslides only to be rebuilt in a matter of two to three 2-year pink salmon cycles due to straying pinks. Another example of nature's ability to replenish her streams would be the Katmai volcano of June 6, 1912 which entirely filled all of the streams on Afognak and part of Kodiak and the mainland district with highly acidic volcanic ash, decimating these runs. Only to be rebuilt over time through nature's ability to allow salmon to stray from their stream of origin.

Alaska hatcheries are run based on solid biological data. The health of the fish, streams and ecosystems are in the forefront of their management. Other pink and chum producing countries in the Pacific Rim do not have the same management mentality. The closure of Alaska hatcheries is an open invitation for these countries to flood the world's markets and streams with ill managed hatchlings.

Hatcheries help to provide an economical protein source for government food programs both domestically and around the world. If they are set up to fail through these proposals, or any others, there will be many and varied detrimental impacts.

Thank you

David Hilty

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Magnolia Hirsch, and I am a hatchery worker and research technician with the Northern Southeast Regional Aquaculture Association in Southeast Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals were to be adopted, I would completely lose job security as someone currently paying student loans.

Our community is built on commercial fishing, and by adopting these proposals, harvesting would be reduced, directly and indirectly impacting the community through trickle-down effects. I would expect salmon runs to significantly decrease if egg takes were reduced. Runs impact the community directly but also impact the ecosystems. Hatcheries help maintain naturally occurring salmon runs by taking harvesting pressures off wild runs through hatchery egg intake.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Magnolia Hirsch  
Southeast Alaska

**Submitted by:** Cole Hockema

**Community of Residence:** Kodiak

Alaska Board of Fisheries

Alaska Department of Fish and Game

P.O. Box 115526

Anchorage, AK 99811-5526

March 2, 2026

Re: Oppose Proposals 163, 164, 165 and 170, 171, 172

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Cole Hockema. I have been a resident of Kodiak for the last 14 years. My wife and I moved here in 2012 and are raising our two daughters in Kodiak. I am the captain of our family-owned and locally operated vessel, the F/V Pacific Storm. In addition to supporting my family, my vessel provides year-round employment for several crew members, most of whom are Kodiak residents. We purchase fuel, groceries, gear, parts, repairs, and services locally, contributing to Kodiak's small businesses and marine trades.

We participate in the Gulf of Alaska pollock and Pacific cod trawl fisheries and tender salmon in Kodiak during the summer. While trawl fisheries make up most of our annual effort, salmon tendering is a critical part of our business model. It provides steady income during periods when trawl seasons are closed and helps stabilize our operation across the year. I want to see all of Kodiak's fisheries thrive — trawl, salmon, sport, subsistence — because it takes a diverse and balanced fleet to sustain our community. For these reasons, I strongly oppose Proposals 163, 164, 165, 170, 171, and 172.

Although a large portion of our fishing occurs outside of three nautical miles, there are important areas inside three miles that are essential to our operations. In Kodiak, we fish in areas such as Marmot Bay, particularly during the A season and during periods of rough weather. These inside areas allow smaller vessels like mine to operate more safely by providing protection from heavy seas and allowing us to make shorter transits from town, reducing fuel costs and risk. These areas also help fill in the gap of fish for shoreside processors when weather doesn't allow for fishing in other areas, keeping the fish plants and their employees working. For vessels under 58 feet in the Western Gulf of Alaska, access to inside waters can make the difference between participating in a fishery or being tied to the dock. These areas are important to maintaining viable fishing seasons, providing early season paychecks for crew, and sustaining the economics of our operation.

The areas we fish inside three nautical miles around Kodiak are generally steep, rocky, and uneven. They are not places where anyone would intentionally drag a net on the bottom. Our midwater trawl gear is fished up off the bottom in the water column. If I attempted to fish my midwater net on the bottom in these areas, I would almost certainly destroy it. My codend and net represent an investment well over \$100,000. The idea that we would risk that level of capital by haphazardly dragging on rocky bottom is unrealistic and inconsistent with how this fishery operates.

I have participated in the Trawl Electronic Monitoring program since 2024. Cameras are on for 100% of my pelagic pollock trips. As trawl fishermen, we are already heavily invested in improving monitoring, transparency, and scientific understanding of our gear. We are voluntarily participating in the Gear Innovation Initiative, where researchers from Alaska Pacific University are using detailed net plans, gear specifications, and interviews about how we fish to model how pelagic trawl gear functions in the water column. That information will be compared to field trials and used to replace outdated assumptions about bottom contact with scientifically derived data. This work is incorporated into the North Pacific Fishery Management Council process, peer-reviewed by its Science and Statistical Committee, and will inform updates to the Fishing Effects model in the Essential Fish Habitat 5-

year review under the Magnuson-Stevens Act. This is a public, transparent, and science-based process that is already underway.

I am writing in opposition to Proposals 163–165 because they are outside the Board’s authority as written and appear not to have been developed with a full understanding of how the fishery operates. These proposals would create significant new expense for the State of Alaska — at a time when the state faces ongoing fiscal challenges — and additional compliance costs for vessel operators, with unclear or unproven conservation benefits. We already have strong federal oversight, electronic monitoring, and ongoing scientific review addressing the very issues raised by these proposals.

While I oppose Proposal 165 because it exceeds the Board’s authority and because the State currently lacks a practical mechanism to monitor and enforce excluder use, I want to be clear that I already use a salmon excluder when fishing. It is the responsible thing to do, and avoiding salmon bycatch is in everyone’s interest. Salmon excluders are designed to allow salmon to exit the net while retaining target species like pollock, and their use reflects our fleet’s commitment to conservation and accountability. Responsible operators are already implementing these tools without the need for additional state mandates that may conflict with federal management.

I also strongly oppose Proposals 170–172. These proposals are misguided and pose a threat to the coastal communities that rely on salmon fisheries. Alaska’s hatchery program supplements pink and chum salmon stocks in a responsible, science-based manner. Hatcheries were never intended to replace wild stocks, nor do they. Oversight and permitting authority should remain with the Alaska Department of Fish and Game, the agency with the scientific expertise and statutory responsibility to manage salmon in accordance with Alaska’s sustained yield principles.

Salmon are important to my business and my community. In the summer, my vessel tenders salmon in Kodiak, directly supporting local fishermen and processors. Those tendering opportunities provide critical income that keeps my crew employed and my operation financially stable. A strong hatchery program supports consistent harvest opportunities that benefit fishermen, processors, support businesses, and local families. Hatchery production has not diminished salmon fishing opportunities in Kodiak; instead, it has strengthened the economic foundation of our coastal communities.

Alaska’s hatchery program benefits commercial fishermen, sport anglers, subsistence users, processors, and the broader state economy. As Board members, you are entrusted with balancing user groups while ensuring the long-term sustainability of our fisheries. Actions that undermine the hatchery program or restrict responsible fishing access without clear scientific justification risk unintended consequences for working families and small coastal towns like Kodiak.

For all of these reasons, I respectfully urge you to take no action on Proposals 163–165 and 170–172. Please allow the existing science-based, transparent management processes to continue and avoid measures that would create unnecessary cost, uncertainty, and hardship for Alaska’s fishing communities.

Thank you for the opportunity to comment and for your service to our state.

Sincerely,

Cole Hockema

---



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nicholas Hoffman, and I am a commercial fisherman based in Kodiak, Alaska. I make my living supporting my family by catching salmon, and I also subsistence fish to fill my freezer and feed my family and friends.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The hatchery in Kodiak provides some stability to a variable salmon run, and any reduction in salmon would mean less money for all the fishing boats in the fleet. Some years, about half my time is spent fishing at the hatchery, and any reduction would affect my bottom line.

The hatchery in Kodiak produces so many fish for the subsistence, sport, and commercial fisheries. A 25 percent reduction would affect everyone.

Some regions in Western Alaska have seen large declines in the number of salmon returning. Meanwhile, Bristol Bay has seen record return after record return. Salmon hatcheries hundreds of miles away have no impact on the returns in Western Alaska. In-river disease issues or high river temperatures in summer are a much more likely reason for the declines.

Hatchery programs help everyone by increasing the number of fishing opportunities in a region. Their work together with ADF&G on data collection, stream and ocean monitoring, and all the sampling of fish provides so much data on the ever-changing ecosystem in the Gulf of Alaska.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm

coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Nicholas Hoffman  
Kodiak, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Tyler-Rose Hoffman, and I am the wife of a commercial fisherman in Kodiak, Alaska. I co-own our business and our vessels.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Salmon seining in Kodiak is our primary source of income. My husband often fishes at the hatchery, and we rely on those fish to feed and shelter our family. Especially in otherwise lean years, access to hatchery fish is key for us to care for our family and keep our business operating.

We are not the only family that benefits from hatchery fish. Reduced harvesting opportunity at our hatchery impacts many people in the community — other fishing families as well as those employed by the processors and those who rely on hatchery fish for subsistence food.

Any hatchery reductions should only be made if justified by solid science, not based on hard feelings or mere speculation. These changes would impact too many people to be made lightly.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Tyler-Rose Hoffman!  
Kodiak, Alaska



**Submitted by:** Gary Hollier

**Community of Residence:** KENAI,AK

DEAR MADAME CHAIR AND MEMBERS OF THE ALASKA BOARD OF FISH,  
MY NAME IS GARY HOLLIER. I AM A 72 YEAR LIFELONG RESIDENT OF KENAI, ALASKA.  
I HAVE BEEN A SETNETTTER IN COOK INLET FOR 55 YEARS.

I AM WRITTING TO OPPOSE PROPOSAL 175. THIS PROPOSAL WOULD REDUCE THE SIZE OF THE WEB IN A DIPNET FROM 4.5 INCHES TO 3 INCHES.

ADDITIONALLY THE USE OF A ROPE ATTACHED TO THE VESSEL AND THEN TO THE DIP NET WOULD BE ELIMINATED.

I PERSONALLY HAVE OVER 100 TOTES OF GILLNETS. THE MESH SIZE VARIES FROM 4 3/4. INCH TO 5/1/8 INCH.

HIS AMOUNTS TO OVER \$100,000 WORTH OF GEAR THAT I CAN NOT USE.

IN 2024, WHEN THE BOF, CREATED A STOCK OF MANAGEMENT CONCERN FOR LATE-RUN KENAI RIVER KING SALMON, THEY ASLO CREATED A SET NET DIP NET FISHERY IN THE PLAN,

IN THE NEWLY CREATED DIP NET FISHERY, I HAD TO PURCHASED 4.5 INCH GEAR TO BE LEGAL IN THIS FISHERY. THIS WAS A CONSIDERABLE STRAIN, SEEING THAT THE ESSN FISHERY HAS BEEN A FEDERAL DISASTER FOR 6 OUT OF THE LAST 7 YEARS.

WITH ONLY 2 YEARS IN THE STOCK OF CONCERN PLAN ,IT ONCE AGAIN WOULD ANOUNT TO INCREASED COST, IN A FISHERY THAT AT TIMES IS VERY CHALLENGING TO BE PROFITABLE.

THERE IS A UPPER COOK INLET MEETING IN 2027, WHERE THIS AND MANY ISSUES COULD AND WILL BE ADDRESSED.

WITH THE SECOND LARGEST TIDES IN THE WORLD, IT ALSO WOULD BE VERY HARD TO DIP NET WITHOUT ATTACHING THE DIP NET , WITH A ROPE, TO THE VESSEL.

DURING ROUGH WEATHER, BIG TIDES, AND RUNNING LINES EVERY 600 FEET ON THE BEACH, LOSING THE ABILITY TO ATTACH A ROPE TO THE DIP NET, WOULD MAKE DIP NETTING VIRTUALLY IMPOSSIBLE.

HIS DIP NET FISHERY IS AT BEST 5% OF THE ECONOMIC POTENTIAL OF A REGULAR SET NET SEASON IN THE AREA WHERE I SET NET IN COOK INLET.

ALL DIP NET FISHERIES ARE DIFFERENT. PLEASE DO NOT PASS PROPOSAL 175.

THANK YOU,

GARY L HOLLIER

KENAI, AK.

---

Oliver N. Holm

March 2, 2026

[REDACTED]  
Kodiak, AK 99615

Alaska Board of Fisheries

My comments on proposals 170, 171, & 172.

Board members,

I am opposed to the adoption of all three of these proposals. My comments will be primarily focused on proposal 170 which would have the most immediate negative effect on Kodiak's salmon fisheries.

I have been an elected representative of Kodiak salmon fishermen on the Kodiak Regional Aquaculture Association board of directors and the Kodiak Fish and Game Advisory Committee since the 1980's and began salmon fishing in Kodiak in 1964.

A 25% reduction in pink salmon production at the Kitoi Bay Hatchery would have an immediate negative impact on KRAA's ability to provide fish for our common property fisheries. Fewer fish would be available for harvest, processing and food for the public. Pink salmon have been the most consistently productive production for KRAA and provides most of the money to fund our other programs/fish releases.

The speculation behind proposal 170 that pink salmon are somehow reducing king salmon abundance in the Yukon and Kuskokwim Rivers isn't supported by evidence. How much of an increase in AYK king salmon would result from a 25% reduction in pink salmon releases? There isn't any credible answer to that question. The idea that pink salmon are somehow out competing king salmon in the North Pacific Ocean ignores the differences in life history between the two species. Pink salmon enter the marine environment at a very small size and remain small enough to be prey for feeder kings for most of that year. King salmon smolt enter at a much larger size and spend several years feeding at progressively larger sizes where their prey would be much larger than that targeted by our pink salmon releases.

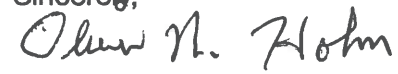
Pink salmon aren't the only species feeding in the North Pacific. There are large biomasses of squid and pollock as well as others out there. The pollock fishery by-catch of feeder kings indicates that there is significant overlap in feeding areas of pollock and king salmon. Pink salmon are conspicuously absent in the by-catch. This is a verifiable indicator against food competition between pink salmon and king salmon for most of the year.

There has been speculation that the odd year dominance of Alaska pink salmon returns indicates that pink salmon numbers are driving prey abundance in the Gulf of Alaska. Rather than causing the two year cycles in the gulf, the cyclical variations are driving the differential survival of pink salmon as well as other species. KRAA attempts to release the same number of pink salmon on both odd and even years. Our returns follow the pattern of bigger returns on odd numbered years. If our pink salmon releases were driving the odd/even cycles wouldn't you expect that our even year pink returns would be the same as the odd year returns or maybe even larger due to less wild pink competition?

Proposal 170 would impose significant losses on our fisheries without the likelihood of an actual benefit to the AYK fishers.

With decades of personal involvement in salmon enhancement, I am quite concerned about the possibility that the BOF would now intrude in our operation and overturn decades of experience and process involving the public, KRAA, and the Department of Fish & Game that has led to our current operation and production.

Sincerely,

A handwritten signature in black ink that reads "Oliver N. Holm". The signature is written in a cursive style with a large, prominent "O" at the beginning.

Oliver N. Holm

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Eric Holmstrom, and I am a commercial fisherman based in Washington State, operating under Holmstrom Fisheries LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I have relied on the fish supply and opportunities provided by Alaska's hatcheries for over 20 years and recently invested in a drift gillnet operation, with the majority of my business deriving from hatchery support.

The economic loss from these proposals would impact my young, growing family, which is rooted in the commercial salmon fishing industry in both Alaska and Washington. We saw what happened in Washington following the Boldt Decision and the defunding of hatchery programs — a collapse of the industry and with it the culture that defines our regions.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Eric Holmstrom  
Washington State



**Submitted by:** Mark Holst

**Community of Residence:** Sitka

Hello Madam chair and esteemed Board of Fisheries members,

My name is Mark Holst, I own the Troll vessel October out of Sitka and am a born and raised Troller/Longliner. Thank you for this opportunity to share my thoughts.

I oppose proposal 168.

This proposal is too broad and all encompassing to be effective. As an example, I crew on a boat in SEAK for Dinglebar season, which is a ground fish fishery. When the season ends we break down the gear and put it away in the cabin of the boat and move on to the next fishery, often Sablefish longlining. We would then be in violation of the law because we are participating in a ground fish longline fishery with Dinglebar Lingcod jigs on board. I could never in a million years catch a Sablefish with Dinglebar gear and yet we would be in violation of the law. Again, this proposal is too broad and far reaching to be effective, there are much better solutions to this problem than proposal 168.

I strongly Oppose proposal 170.

Reducing the permitted egg take level by 25% will have severe unintended consequences. A reduction of this size to our Chum and Pink salmon production would not only be devastating to our commercial fishing fleets, but also detrimental to the health of our hatcheries themselves. This proposal does not provide any data showing what stocks would benefit, what the impacts of this reduction would be, nor provide any analysis for why 25% is the correct reduction to achieve the unspecified goals. The state of Alaska is a very large place with many differing ecosystems. A flat 25% statewide reduction without site specific analysis bypasses the entire scientific process that our fisheries and hatcheries are built on. This proposal neither demonstrates a specific problem, nor provides a working solution.

I Oppose proposal 172 for the same reasons I oppose proposal 170.

A statewide moratorium, just like a statewide reduction as in 170, completely bypasses site specific scientific studies without adding any proven conservation benefits. Hatchery production has been stable for the better part of a decade, strong wild salmon returns continue in areas that have multiple operating hatcheries. Here in southeast we have seen our King salmon stocks of concern rebound, all the while continuing with normal hatchery production.

I Oppose proposals 176, 177.

Proposal 176 specifically states that one of its intentions is to increase food securities for non residents. Alaska is not the land of unlimited resources. In the midst of King salmon allocation cuts, Halibut quotas cuts, as well as many other struggles our resources are experiencing, why are we focused on increasing non resident food insecurities? The purpose of non resident sport fishing is not for filling the lower 48s freezers with our fish. The purpose is to bring outside commerce into our great state for the betterment of our economies while providing equal opportunity for everybody to enjoy our oceans bounties. Potentially increasing primarily non resident take of alaskan resources will neither assist in the recovery of our stocks, nor increase the number of non residents clients returning to fish another year.

I Oppose proposal 178.

Although I agree with the intent of this proposal, I believe the consequences of this would be the same as in proposals 176 and 177, which is a pooled bag limit and potentially increased non resident harvest.

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February 28, 2026

Homer Charter Association



Homer, AK 99603

Alaska Board of Fisheries

1255 W. 8<sup>th</sup> St.

Juneau, AK 99811

**RE: Proposal 183**

Dear Chair Carlson-Van Dort and Members of the Board,

The Homer Charter Association (HCA) does not support Proposal 183, as currently written. The proposal would require an angler to retain all fish carcasses that cannot be used as bait, a mandate that would apply across multiple species. The requirement of such measure would impose an undue burden on the City of Homer Port and Harbor and strain city services beyond reasonable expectations. In addition to being a burden on anglers and charter businesses, disposing of all carcasses caught at sea would be a logistical disaster. It's unclear if the existing infrastructure could even handle the increased load of fish carcasses. As such, HCA respectfully requests that Proposal 183 be amended to align with the existing federal regulation to ensure consistency, practicality, and enforceability.

The HCA is a local trade group based in Homer, Alaska that represents guided recreational stakeholders in the Alaskan communities of the lower Kenai Peninsula and Kodiak. The HCA is proud that the regional economic impact of our fleet goes beyond benefiting just our members. We are a pillar within the cooperative framework of fishers, fleets, and marine trade workers that make our region strong and our communities resilient.

Thank you for your consideration,

Homer Charter Association

March 1, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

RE: Proposals 170, 171, 172

Ms. Chair and the Board of Fish:

Hello, I am Bryan Horn, third generation commercial salmon seiner in Kodiak as well as a sitting board member at KRAA. I am writing in opposition to proposals 170, 171, and 172.

Any decrease in anyway considering production at Kodiak Regional Aquaculture Association would have detrimental effects for the Kodiak fishing fleet. In turn, having consequences in the entire Kodiak community.

Kodiak's weak red salmon runs recently have made the early run chum fishery in and around Kitoi Bay hatchery a major booster for the Kodiak salmon seiners. For the last 3 years, the hatchery has helped fishermen greatly. the first two of those 3 years, there were a limited number of vessels however enough fish to make it work. Last June with our prior restrictions on the westside of Kodiak and Southwest corner brought basically the entire normal westside boats to Kitoi. Making it very crowded, I do believe everyone did well enough to make June fishing in Kodiak viable. Cuts to chum production and removing this option in Kodiak would make June not worth even fishing.

With concerns to pink salmon, it is well known that Kodiak is very volatile. Typically, at KRAA, in years of low wild returns, we take far less cost recovery to let the common property harvest a vast majority of the return. On years with big wild forecast, we take more cost recovery to cover the low years. The hatchery and the wild fish work hand in hand to keep Kodiak a place my children can fish. Cutting pink salmon would force KRAA to take more fish every year and leave little on the table for fishermen.

I have been fishing in and around the hatchery for 38 years. I began at 6 years old riding around with my father learning the ropes. Then moved upped to deckhand, skiff man and finally captain. For the last 25 years I have been behind my own wheel supporting my family. My 4 kids come out on the boat often. For the last two years my two high school sons have been full share crewmembers working with me the entire summer. I hope my kids can continue to have the same chances I did getting into this industry.

The other proposals would be equally bad for hatchery programs whether in Kodiak or elsewhere. There's no need to take these actions when there's science and oversight by the Department. I urge you to take no action on any of the proposals concerning hatcheries.

Thank you for your time.

Bryan Horn  
Kodiak, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Chris Hottinger, and I am a commercial fisherman, subsistence user, and sport fisherman based in Cordova, Alaska.

The reduction in hatchery production would directly affect my job security and my family's livelihood. These proposals would also directly reduce harvest opportunities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

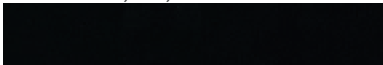
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Chris Hottinger  
Cordova, Ak, Alaska



## **Andrew Hull - Area E drift gillnet fisherman and permit holder**

### **Oppose - Proposals 170, 171, 172**

As a career commercial fisherman and permit holder/participant in the area E drift gillnet fishery, I strongly oppose proposals 170, 171, and 172. These are speculative, sweeping reductions that have no guarantee of benefitting wild salmon stocks while ensuring a negative impact on all user groups by destabilizing the hatchery systems that provide sport, subsistence, and commercial opportunity as well as research, monitoring, and data collection.

### **Economic Impacts**

The 10 year average of annual statewide hatchery chum and pink salmon ex vessel value is over \$48 million for chum salmon and \$44 million for pink salmon (COAR data from ADFG). A 25 percent reduction in egg take would lead to over \$23 million in economic losses in ex vessel value alone, with total economic losses being higher as impacts ripple through coastal communities. Lower revenue from chum and pink production means less money circulating through fishing communities and slimmer margins for fisherman who are already struggling to navigate variable market conditions, higher operating costs, and labor shortages.

### **Misleading scientific claims**

Proposal 170 cites a literature review (Mcmillan et al. 2023) that examines interactions between hatchery salmonids and wild salmonids, claiming 83% of studies find adverse or minimally adverse impacts. This figure is incredibly misleading. Of the 206 studies this literature review examines, only half are even from the United States. Brown trout is the most commonly researched species in this literature review, with steelhead and Atlantic salmon being the third and fourth most examined species. Only 28 of the 206 studies examined chinook salmon, nine looked at coho and pink salmon, and none looked specifically at chum or sockeye salmon. Furthermore, only 11% of the studies evaluated hatchery effects in the ocean, which is where competition between hatchery and wild stocks would in theory occur.

Clearly, the results of this study cannot be extrapolated to the Alaska hatchery system and should serve no basis for policy decisions. Hatchery management needs not only to be data backed and science driven, but the science needs to pertain to Alaska and not be misrepresented to paint a false narrative.

### **Impacts on all user groups**

These proposals focus on chum and pink salmon hatchery production that is largely harvested by commercial fisherman, but many of the impacted hatcheries also

produce runs of sockeye, coho, and chinook salmon that are heavily targeted by sport and subsistence users. In PWS, during years when sockeye hatchery returns have fallen short of cost recovery goals, PWSAC has used chum salmon hatchery production to supplement its sockeye cost recovery goals, allowing the entire hatchery operation to continue running. Placing restrictions on egg take for pink and chum salmon will reduce the flexibility these hatcheries have for generating revenue to continue operating, jeopardizing harvest opportunities for all user groups. Additionally, hatcheries provide valuable data collection, research, and ecosystem monitoring that help inform management, further benefitting all user groups.

In conclusion, I am strongly opposed to proposals 170, 171, and 172. These proposals are based on dubious science that has no guarantee of changing ocean dynamics or benefitting wild stocks. Meanwhile, these blunt, sweeping reductions will have guaranteed negative impacts on not only the hatchery systems but on commercial, sport and subsistence users.

PC224

**Submitted by:** Colin Hurley

**Community of Residence:** Eagle River

Would love to see little to no trawling, protection for coho, and limited hatchery release of pinks.

---

PC225

**Submitted by:** Pete Imhof

**Community of Residence:** Wasilla

Proposal 186

We're seeing a trend with lack of coho in the susitna drainages, this trend has left us with restrictions and multiple closers for the last 3 yrs, it's very apparent that the high sockeye numbers on the kenai have triggered multiple EO for the drift fleet which is affecting our coho up north, believe it or not families depend on coho, guides would like a complete season and recreational fisherman are left holding the Burden of conservation. Over escapement of reds on one fishery isn't justification to over harvest a mixed stock moving to the north.. please consider 186 it's well thought out. Thanks for your time I'm good.

---

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Clifton Ivanoff. I own and operate a commercial salmon seiner fishing out of Kodiak, Alaska. I began fishing as a young boy with my father and now operate my own vessel.

The proposed hatchery reduction would significantly impact my fishing opportunities. In 2025, approximately fifty percent of my salmon catch came from the Duck Bay hatchery run. A 25 percent reduction in catch could force already struggling fishermen to make difficult financial decisions between vessel maintenance and basic household expenses.

Kodiak's economy is deeply tied to fishing. When fish stocks are down, the entire town feels it. Processors operate at limited capacity, retailers reduce supply orders, fuel docks sell less fuel, and marine trades experience reduced demand. Hatchery programs have been a vital tool in enhancing and stabilizing salmon production in Kodiak.

Permanent or unjustified changes to hatchery programs could severely impact the community and potentially lead to unnecessary legal and financial burdens.

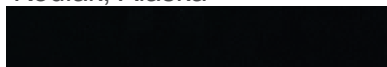
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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Clifton Ivanoff  
Kodiak, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Peter Ivanoff, and I am a commercial salmon seiner in Kodiak. I have fished at Kitoi Bay Hatchery for many seasons, and I fish aboard the F/V Aleutian Belle.

Proposals 170, 171, and 172 would reduce fishing opportunities for the fleet and leave less fish for processors. These proposals would lower our fish intake, slow processors, and affect our local economies with ripple effects across businesses and families.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

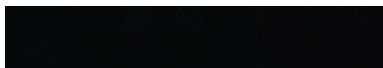
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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Peter Ivanoff  
Kodiak, Alaska



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

March 1, 2026

Re: Oppose Proposals 11, 163, 164, and 165

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Alex Jackson. I am an Alaska resident and live in the community of Sand Point, Alaska. I own and operate the F/V Karen Evich, a 58-foot combination vessel. For the proposals under consideration, we trawl for cod and pollock in the Aleutian Islands and the Gulf of Alaska.

Proposal 11 would effectively end our ability to trawl for cod in the Aleutian Islands. In some years, traveling to Adak and participating in the State Waters trawl fishery has literally saved our winter season. Although there has not been a processor in Adak for many years, the last time there was a market there, we participated in the Aleutian Islands State Waters trawl fishery. Our vessel's first season fishing in that area was in 2001.

Originally, small trawlers (58-foot vessels) were fishing in the parallel fishery because they did not have federal LLP's for outside of three miles. With the help of Clem Tillion, who advocated for small-boat fishing opportunities, the Aleutian Islands State Waters fishery was created. The first 58-foot vessels to participate were trawlers—not pot boats.

This proposal would negatively affect my business and would also eliminate future opportunities for economic growth in the communities of Adak and Atka should a processor re-establish operations in those areas.

Proposal 163 would also eliminate most of our traditional pollock trawl grounds in Gulf of Alaska Area 610. At least 75% of our A-season pollock

fishing occurs inside three miles, and likely about 50% of our B-season fishing as well. Removing this area from trawling would be absolutely devastating to the small-boat fleet.

The larger vessels—the ones people typically picture when they think of “trawlers”—have more offshore options because they can safely operate in rougher weather. Small vessels like ours rely on these nearshore areas to maintain flexibility, move around, and avoid bycatch. Banning trawling inside three miles may appear to target large vessels, but in reality it will disproportionately harm 58-foot, Alaska-owned and operated boats fishing out of Sand Point and King Cove.

Proposals 163 and 164 both address bottom contact of pelagic trawl gear. Currently, we are voluntarily participating in the Gear Innovation Initiative. Alaska Pacific University is using our net plans, door sizes, main wire output, and other operational data to better understand how our gear functions. This work will provide updated, science-based information on how much bottom contact these nets actually make and is being incorporated into the North Pacific Fishery Management Council process. I strongly urge the Board not to make assumptions or take regulatory action before this project is completed and real data are available.

No one wants to put pelagic nets on the bottom. These nets are expensive to build and repair. The only areas where bottom contact can occur are soft, muddy bottoms. In areas with rocky habitat or hard bottom, I actively keep my net as far off the bottom as possible.

Proposal 165 would require mandatory salmon excluder use in State Waters. While I believe this proposal exceeds the Board’s authority and would be difficult to enforce, I personally use a salmon excluder because I know they work, and my primary goal is to avoid bycatch whenever possible.

I want to emphasize that fishermen in the Aleutian East Borough are already struggling to survive under the current regulatory framework. Our communities are facing shrinking fishing opportunities, rising operational

costs, declining infrastructure, and the continued loss of processing capacity. Many of us are operating on razor-thin margins, and each additional restriction further erodes our ability to remain viable.

We are tired—but we are still here. We are doing the work. We are participating in research, adopting new gear, avoiding bycatch, and adapting in real time to changing conditions on the water. What we need from this Board is stability, restraint, and decisions grounded in data—not additional closures or assumptions that disproportionately burden small, Alaska-based vessels and the coastal communities that depend on them.

Please do not take action on Proposals 11, 163, 164, and 165. Preserving access to these fisheries is critical to the survival of fishing families and communities throughout the Aleutian East Borough.

Thank you for the opportunity to comment.

Sincerely,

Alex Jackson

F/V Karen Evich

**Submitted by:** Brandon Jackson  
Destination Alaska Charters  
**Community of Residence:** Homer

Hello All,

I am writing in support of Proposal 176. My family and I own a high-end charter company in Homer. We have been operating here for 8 years now, and have grown to run three boats. We specialize in private trips that primarily get booked by families. My support for a cumulative bag limit comes from this perspective. We often times have young kids or elderly folk on board who are not able to fully participate in fishing due to physical constraints. The way the law is currently written requires them to push their physical limitations to legally catch/retain fish.

Example 1: Roughly 20% of our clientele have children 5 years old and under. As we have USCG-inspected vessels, we are required to have a railing height of 39.5 inches. Our rod holders are then mounted to the top of that. There is no physical way they can reach unless a parent holds them up to the rod. Add in rough seas or seasickness, and it becomes nearly impossible for that child to legally hook and bring in their own fish. This can lead to a lot of frustration and/or unsafe scenarios of parents trying to hold their children up on the rails. Proposal 176 will allow parents to hook the fish and assist their child in bringing in said fish, creating a safer and more enjoyable experience for all.

Example 2: Another group of our clientele is elderly folks/grandparents joining their families. It is common for them to have difficulty balancing on a rocking boat, especially with the additional challenge of navigating fishing gear. This often leads to them either opting out of fishing altogether or pushing past their safe limits in an attempt to stay legally compliant with hooking and catching their own fish. Proposal 176 would allow for the crew/family to be involved in/assist with the entire catch process. This would ultimately create a safer and more enjoyable environment for this demographic.

As a captain, the safety of my guests is my number one priority. I strongly believe that proposal 176 would allow my crew and me to accomplish this to a higher degree by being more hands-on with our physically limited guests. Greatly appreciate you all considering this proposal.

Cheers,

Brandon Jackson

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**Submitted by:** Tony Jackson  
**Community of Residence:** Nikiski

I oppose proposal 175. As a commercial set net fishing business, it is already extremely financially detrimental to our family's business to be reduced and relegated to using dipnets. IF you are going to continue to close set net fishing and open us only to use dipnets, I urge you to consider that restricting the dip net even further will not entice any more fishermen to utilize the already extremely minimal gear type. Please leave this one alone and allow dipnets to remain the same mesh and the use of rope and a boat to fish.

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**Submitted by:** Gordon Jensen

**Community of Residence:** Cordova, AK

My name is Gordon Jensen. I have been an Alaska resident and commercial fisherman since 1977, with direct participation in one fishery or another in different parts of the state since 1979. I am currently a PWS Seine permit holder, vessel owner and captain, operating a mostly family operation for the last 20 years.

Proposal 170: I oppose proposal 170

I believe that reducing egg take, and subsequent release, would reduce returns in a very negative way. I think a large portion of the release is consumed by predators who are habituated and waiting for the release each year. predator control should be considered and studied.

Proposal 171: I oppose proposal 171

I'm not a scientist but am of the opinion that straying is sometimes a natural reaction to environmental factors and has been happening, in one form or another, since salmon runs began. It could also be good for genetic diversity. More study is needed.

Proposal 172: I oppose proposal 172

For the same reasons as quoted above.

Proposal 187: I oppose proposal 187

This seems to be a resource takeover for commercial sport fish operators.

Regarding other proposals:

I support Proposal 165 – Require salmon excluders for pelagic trawl gear:,

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish:,

I support Proposal 174 – Seine vessel/skiff engine operation requirements:

Thank you for your time,

Gordon Jensen

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Steven Jicha, and I am a commercial fisherman based in Kenai and Cook Inlet. I fish aboard the Seena, and my livelihood depends on having strong and stable salmon returns.

Less fish means the crawlers take up more of our fish, and they will kill it off before you know it, so keep the hatchery open. Reduced harvest will hurt everyone involved and could kill the fisheries altogether. If these proposals move forward, it will mean less jobs and less money not just for fishermen, but for the State of Alaska as well.

Do not mess with what has been working.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Steven Jicha  
Kenai/Cook Inlet, Alaska



**Submitted by:** Jared Jillie

**Community of Residence:** Sitka

Proposal 170

I strongly support proposal 170. I have worked as a fisheries biologist, employee of various PNP hatcheries, and as a commercial power troller for the last 15 years. I do not think that the current level of hatchery releases are sustainable and are becoming detrimental to the wild stocks as well as detrimental to the hatchery fish themselves. I have personally watched the decline in the quality of fish especially Coho and Kings. We do not fully understand the impacts this volume of hatchery fish is causing on the ecosystem. With Western Alaska King stocks in decline as well as Coho having poor returns in South East we need to limit direct competition for these fish. Catching three pound Coho's as a troller is not profitable and the processors cannot market these fish. Over the years I have seen both Kings and Cohos decrease in size. A quality over quantity approach would be much more practical. Juvenile Chum, Coho, Pinks, and Kings directly compete with each other in their ocean phases especially in early life stages. I believe we have surpassed the carrying capacity of the Gulf of Alaska ecosystem. While many are pointing the finger at trawlers currently, we should be looking at what we have done to the ocean food web by releasing such huge volumes of hatchery fish. Hatchery fish are for supplementing wild stocks for increased harvest opportunities. They are NOT for replacing and hindering wild salmon populations and driving down quality of all salmon regardless of there origin.

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**Submitted by:** Brent Johnson

**Community of Residence:** Clam Gulch

I oppose Prop 186. It seeks to restrict commercial drift net fishing. Sockeye escapements have been consistently above the goals in recent years and this is likely to make it even harder for ADF&G to hit their target escapement range. Furthermore, there is not sufficient reason to take Proposal 186 up out of cycle.

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Dear Chairwoman Carlson-Van Dort and Members of the Board of Fisheries,

I am writing to express my opposition to Proposals 170, 171, and 172. I offer these comments in my personal capacity and not on behalf of any organization with which I am affiliated.

I come to this issue from several perspectives. First and foremost, I am a resident of Cordova, a subsistence user, a business owner, and a tribal member of the Native Village of Eyak. I care deeply about the long-term health of wild fisheries and the way of life they support in Prince William Sound and the Copper River region. There is no long-term benefit in risking the sustainability of our resources for short-term gain. The health of our community is inseparable from the health of our fisheries.

I am also a shareholder of both Chugach Corporation and Eyak Corporation, and I serve on the board of directors of the latter. Our shareholders live across Alaska and rely on salmon for subsistence, sport, and personal use. They benefit not only directly from hatchery programs in Prince William Sound, but also indirectly through employment and economic activity supported by strong fisheries and tourism.

Lastly, I serve as Chairman of the Board of the Prince William Sound Aquaculture Corporation. It should come as no surprise that I oppose the proposed 25% reductions in pink and chum salmon production. In my review of the available information, I do not see compelling empirical evidence demonstrating that hatchery pink and chum salmon abundance or straying are causing measurable harm that would justify reductions of this scale. I will leave the detailed scientific arguments to the formal submissions made by hatchery organizations.

PWSAC's mission is "to ethically and professionally optimize salmon production in Area E for the long-term well-being of all user groups." A persistent misconception is that PWSAC exists solely for the benefit of commercial fishermen. The PWSAC Board consists of 45 seats, of which 27 are permit-based. The remaining seats represent sport, subsistence, municipalities, Native villages, processors, and other stakeholders who contribute diverse expertise in support of our mission.

Our five remote hatcheries supply salmon to all user groups. Their benefits extend well beyond Prince William Sound and the Copper River to Alaskans across the state who travel to the region to fish, recreate, and support local communities.

Pink and chum salmon are the financial foundation of PWSAC's operations. Revenue from those species supports coho, sockeye, and potentially Chinook programs that would otherwise struggle to sustain themselves. A 25% reduction would not only affect commercial harvest; it would limit opportunities for sport and subsistence fisheries and reduce the stability of enhancement programs that many communities rely upon. These consequences deserve careful consideration. PWSAC has not ignored the scientific questions surrounding hatchery-wild interactions. The organization has invested significant resources in research and has supported broader statewide efforts to better understand these dynamics.

With respect to Proposal 172, my opposition is straightforward: it is unnecessary. The hatchery permitting and production adjustment process is already extensive, collaborative, and public, with authority vested in the Commissioner of the Alaska Department of Fish and Game. I do not believe it is appropriate or prudent to shift that framework in a manner that could create regulatory uncertainty or undermine the existing management structure. For these reasons, I respectfully urge the Board to reject Proposals 170, 171, and 172.

Thank you for your time and consideration.

Sincerely,  
Eli Johnson

**Submitted by:** Joshua Johnson  
**Community of Residence:** Sutton  
162 and 175

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Jones. I own a 58' salmon seiner that fishes in Southeast Alaska, and my wife owns and runs a Bristol Bay gillnetter. My sons and daughter-in-law also operate Bristol Bay gillnetters and work in the Southeast seine fishery. Our vessels include the F/V Zealot and F/V Janet Elaine.

Reduced hatchery production would reduce income and opportunity for fleets that have funded and built these programs through self-imposed assessments over many years. Hatcheries in Southeast Alaska were created in part to mitigate severe cutbacks to the District 4 fishery under the Pacific Salmon Treaty with Canada.

Hatchery reduction would reduce early-season fishing opportunities in Southeast. That would raise processors' fixed costs with fewer pounds to process, and those costs would be passed back to fishermen through lower prices. A shorter processing season also makes it harder to recruit and retain plant workers. The sport and charter sectors would also be impacted by reduced hatchery returns that support their fisheries and businesses.

Decisions made without rigorous scientific analysis would undermine Board credibility and weaken long-term trust in fisheries management. Hatchery fisheries also help relieve pressure on wild stocks by providing alternative opportunity and giving managers more tools to manage fishing effort.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated

necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
David Jones  
Southeast Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kurt Jones, and I am a commercial fisherman, subsistence user, and sport fishing participant based in Prince William Sound, Alaska. I operate the F/V Pelican.

I am writing to urge the Board to reject Proposals 170, 171, and 172. My opinion on the personal effects of these proposals is beside the point. The reason these proposals are unacceptable is the lack of scientific evidence connected with the reasoning behind them.

Hatcheries are the only thing that has sustained the Prince William Sound salmon fisheries since the Exxon Valdez spill. They also provide harvest opportunities where increasing restrictions on the Copper River have limited the ability to make a living.

The financial implications of these proposals are certain to be felt negatively for years to come by Alaskans who have been encouraged to take the financial risks associated with Alaska's commercial fishing industry and economy.

I am concerned about the trend of making these decisions for political reasons rather than science-based sustainability reasons.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kurt Jones  
Prince William Sound, Alaska



**Submitted by:** Evqn Jonjak

**Community of Residence:** Wrangell

Opposed to 170, 171, 172

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**Submitted by:** Eric Jordan

**Community of Residence:** Sitka, AK

Comment on Proposals 163, 164, 165

Distinguished Board of Fisheries members, interested public, and staff,

I have a long history of involvement with groundfish trawling issues, beginning when I served on the Advisory Panel to the North Pacific Fishery Management Council (NPFMC) from 1978 to 1985. Later, in the 1990s, I supported efforts led by ALFA and Linda Behnken to prohibit groundfish trawling in the outside waters of Southeast Alaska, a measure that the NPFMC ultimately adopted. While working for the Alaska Marine Conservation Council in the late 1990s, I was tasked with drafting a Board of Fisheries proposal to prohibit groundfish trawling in the state waters of Southeast Alaska.

As part of that effort, I worked with then–Southeast Alaska groundfish biologist Victoria O’Connell and reviewed video documentation of the impacts of bottom trawling in Southeast Alaska. I also produced short videos to share at Fish Expo, Commercial Fisheries meetings, and other venues, and became very familiar with the effects of groundfish trawling on benthic ecosystems and habitat, particularly corals and sponges.

Through my involvement in groundfish proposals as Chair and longtime Secretary of the Sitka ADF&G Advisory Committee, I became aware of the uniqueness of different areas and communities in Alaska, and of how critical, detailed, area-specific regulations are to Alaska fisheries management. For example, during the Southeast Alaska trawl prohibition process, it became clear that a blanket trawl prohibition would also eliminate the longstanding pink shrimp beam trawl fishery in the Petersburg and Wrangell areas. I worked with local fishermen to amend the proposal to preserve that small-scale beam trawl fishery in those areas.

Here is what I believe regarding the trawl proposals currently before the Board:

In college, as an education major, I took a course in educational ethics. One lecture addressed the “standards for ethical corporal punishment” in public schools. A fellow student stood up and said, “This is wrong. Nobody should be swatting children in public schools.” I began clapping, and most of the class followed. The professor suggested more literature on these policy standards.

To me, the issue of managing Alaska's groundfish trawl fisheries is similar. The issue is not how we regulate bottom trawling, it is whether we should permit it at all. The most effective groundfish trawling places nets on the bottom, and the incentive to maximize efficiency creates enforcement and compliance challenges.

In summation, I believe the Board of Fisheries should consider prohibiting groundfish trawling in all state waters of Alaska. Just as salmon traps were eliminated for salmon and sunken gillnets were prohibited for groundfish, bottom trawl fishing should also be eliminated.

However, if the Board of Fisheries, in its infinite wisdom, decides to consider allowing groundfish trawling in Alaska waters, the effort should not proceed as a single statewide proposal but instead be considered from regional proposals, evaluated on a spatial area-by-area analysis, recognizing the significant ecological, community, and local fishery differences across Alaska.

Thank you,

Eric Jordan



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Patricia Kallander, and I have lived in Cordova, Alaska for 50 years. In those 50 years, my sole income has been from salmon. Commercial fishing sustains Cordova as our main source of employment. Whether on the grounds fishing, working the canneries, or running any business in our town, we 100 percent depend on a healthy fishery to survive. My husband and I owned many commercial fishing vessels over our 30-plus years of business, purse seining in Prince William Sound and gillnetting the Copper River.

I am writing to urge the Board to reject Proposals 170, 171, and 172. How would these proposals not affect us? Our seine fisheries are family owned, run by small businesses, and managed by community members. Everything we do in our town is based on the salmon — funding our schools, supporting small local businesses, maintaining our infrastructure as a small city, and putting our kids through college.

Less salmon means fewer jobs and economic instability. Our local businesses barely hang on as it is with the high cost of shipping, energy, and heating fuel.

Please pay attention to the science. We believe in the process of research. Less hatchery production will not change the outcomes of environmental changes in our oceans. Prince William Sound has been researched extensively since the oil spill. Since losing our entire herring fishery, we do not need more hits from more shoddy research studies.

Allow the Alaska hatchery research to continue to get clear answers before widespread reductions in egg take. You are not just cutting back on salmon — you are cutting entire livelihoods, families, and communities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

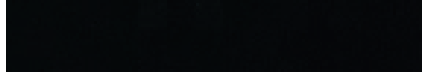
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Patricia Kallander  
Cordova, Alaska



**Submitted by:** Darius Kasprzak  
Alaska Jig Association  
**Community of Residence:** Kodiak

Madam Chair Carlson-Van Dort and Board of Fisheries Members,

The Alaska Jig Association (AJA) would like to reemphasize our support for Proposal 167, which we have authored.

At our most recent AJA membership meeting in January, our members voted unanimously to support Proposal 167, as amended by the Kodiak Advisory Council (KAC).

Proposal 167 as amended by the KAC, would include the following language: vessels registered to jig Pacific cod fish in the Prince William Sound, Cook Inlet, Kodiak and South Peninsula Regions may only carry mechanical jigging machines and hand troll gear.

Approving Proposal 167 as amended would address the widespread perception amongst the jig sector- of current systematic fishing for Pacific cod with alternate gear types, that results in unlawful catch being offloaded and documented as jig caught.

We believe that passage of Proposal 167 will provide long term security for both entry level and career jig fishing operations alike.

AJA supports Proposal 166. A specific definition of “jigging machine” is long overdue. As typically used aboard legal jigging operations; the vernacular denotes an automated or clutched reel mounted on deck stanchions or rails, and light enough to be transported by a single fisher. Specifying realistic physical dimension limits will exclude much larger mechanisms (such as longline reels) that are also capable of vertically operating a single line in the water column. This will provide clarity to the fleet, remove temptation for cheating with non-jig gear, provide security for dedicated jig fishers, and provide needed guidance for law enforcement.

AJA supports Proposal 169. We strongly suspect based on anecdotal evidence, that slinky pot gear carried aboard some vessels is sometimes utilized for illegal fishing. A more specific definition of this highly effective and relatively recently introduced gear type, will be beneficial for both fishery stakeholders and management.

Sincerely,

Darius Kasprzak

President, AJA

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Vicki Sue Kuller. My husband has commercially fished in Alaska since he was 15 years old. Together we have built our entire life around the Alaska commercial fishery. We operate under Outlaw INC. and Rhoda Je-Anne INC., and have fished in Kodiak, Bristol Bay, and Prince William Sound for decades.

We have invested millions of dollars into permits, vessels, and infrastructure. Our family holds multiple permits and vessels that represent our life's work and retirement. If these proposals pass, we may not survive financially.

The ripple effect of reducing hatchery production would be devastating statewide. Commercial fishing supports fishermen, crew members, tenders, cannery workers, brokers, boat yards, marine trades, processors, and local businesses in Valdez, Homer, Anchorage, and beyond. Entire communities rely on this economic engine.

Reducing hatchery production by 25 percent without demonstrated scientific necessity would severely devalue investments made in good faith under Alaska's established management framework.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Vicki Sue Kuller  
Alaska



Frank Kelty

[REDACTED]  
Palm Desert CA 92211  
[REDACTED]

Date: March 2, 2026

To: Alaska Board of Fisheries Chairwoman Carlson Van Dort

From: Frank Kelty

Subject: Statewide Finfish and Supplemental Issues

Proposals 11, 163, 164,165

Chairwoman Carson Van Dort:

My name is Frank Kelty, I am writing today on behalf of myself. A little background for the for the Board of Fisheries. I lived in Unalaska for 50 years; I have now resided in my retirement home in Palm Desert CA for the last five years. I have worked in the Alaska Seafood Industry for 30 years, mostly in Unalaska as a plant manager for all Crab species and Pacific Cod. I served the Community of Unalaska as the Mayor for 12 years as a City Council member for 8 years and as a school board member for 6 years. I am a current member of the Unalaska AC and have served as the chairman in the past for over 20 years.

I am writing today in opposition to Proposal 11, 163, 164, and 165.

Proposal 11: This proposal is not necessary and should be opposed by the Board of Fisheries, there is little effort in state waters west of 170 degrees by the Amendment 80 trawl fleet, which is have observer on board 24-7. ADFG reports little bycatch of Golden King Crab, about sixty-six crabs annually. The Unalaska AC Minutes from October 2025 show that Alaska Peninsula, Aleutian Island, Bering Sea, and Chignik Pacific Cod meeting the Unalaska AC opposed Proposal 11 1-4 The paragraph below is from ADFG staff report on proposal 11.

*Reported bycatch of golden king crab inside state waters west of 170° W. long by trawl gear vessels (based on ADF&G fish tickets) is low. From 2020–2025, an average of 66 golden king crab (1%) was annually reported as bycatch by trawl vessels operating inside state waters while the remaining 99% or 5,362 crab caught as bycatch were reported from vessels operating in federal waters (Table 30). Comparable federal data indicates a similar pattern of state/federal golden king crab trawl bycatch. Unobserved bycatch and mortality of golden king crab by trawl gear also occurs but is unquantified*

*for king crab in the Aleutian Islands. No golden king crab was reported to be caught with trawl gear in the AIS state-waters Pacific Cod fishery from 2020-2025.*

I really do not think we have a problem here that needs any action by the Board of Fisheries I would urge you to oppose Proposal 11.

Proposals 163, 164, and 165: I am opposed to all three proposals. The ADFG staff report on all three proposals I agree with 100% with ADFG report staff analysis on all three of these proposals which they oppose as well.

*ADFG DEPARTMENT COMMENTS: The department is **OPPOSED** this proposal. Given the lack of specific details, the proposed intent is unactionable by the department. Developing a trawl monitoring and performance compliance program exclusive to state waters will yield limited benefits and utility relative to costs. The department recommends coordinating efforts to address trawl effects across federal/parallel fisheries with the Council, NMFS, fishery stakeholders, and state/federal fisheries law enforcement agencies prior to adopting this proposal. 1 Fishing Effects model infographic <https://meetings.npfmc.org/CommentReview/DownloadFile>*

*COST ANALYSIS: Approval of this proposal will result in additional direct costs for a private person to participate in this fishery if additional monitoring, sensors, or other gear compliance verification systems are required. Approval of this proposal will result in substantial additional direct costs for the department to develop and administer a trawl gear monitoring and compliance program. Cost estimates are unavailable at this time and will depend on the final scope of the new program. As proposed, funding more than what is currently available to the department will be necessary and costs could be duplicative of current and ongoing federal efforts towards addressing similar goals.*

Best Regards

A handwritten signature in black ink, appearing to read 'Frank Kelty', with a long horizontal flourish extending to the right.

Frank Kelty

**Submitted by:** Frank Kelty

Kelty and Associates

**Community of Residence:** Formerly Unalaska for 50 years now in retirement Palm Desert CA

Proposals Number 11, 163,164 and 165 all opposed

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**Submitted by:** Lisa Gabriel

Kenai Peninsula Fishermen's Association

**Community of Residence:** Kenai

March 2, 2026

Opposition to Proposal 175

Alaska Board of Fisheries,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited-entry permit holders, and is a registered 501 c(6). We also include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and individuals with a general interest in our membership.

The geographical area of the Eastside Setnet Fishery (ESSN) reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the fishery originate almost exclusively in the Kasilof and Kenai River systems. Some 440 limited-entry permit holders, each small businessperson, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents). The historic season usually runs from late June to August 15, but recent regulations and management have significantly shortened or closed it. Our fishery has been declared a fisheries disaster in 6 of the past 7 seasons and is under consideration for the 2025 season.

We oppose Proposal 175, submitted by the Ahtna Intertribal Resource Commission, which will be presented to the Alaska Board of Fisheries for consideration at the 2026 Statewide Finfish meeting scheduled for March 17-21, 2026, in Anchorage.

The Alaska Board of Fisheries (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024, while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow for the harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon recovery.

Proposal 175 seeks to change 5AAC 39.105. Types of Legal Gear which will directly reduce the legal gear for the ESSN fishery within 5AAC 21.382 Kenai River late-run king salmon stock of concern management plan. This change will reduce the only gear available to our fishermen under the commercial dip net fishery regulations in the Eastside Setnet fishery, until King salmon goals are projected in the current stock of concern management plan.

The reduced efficiency of dipnets compared to our traditional setnets is already a drastic reduction in our commercial fish harvest ability, and with the additional restrictions in Proposal 175, our fishery participants would be reduced to only the young and fit, excluding all other fishermen, family, and crew members from participating. It is discriminatory and creates extremely unsafe conditions for our fishing families.

The ability to hold a dipnet without having the assistance of the rope to hold it in some of the strongest tides in the world is beyond comprehension. The loss of gear or the risk of fishermen being pulled overboard with an unsecured net is a very real possibility. Dealing with strong tides, wind, rocks, surf, and hours in an open skiff poses many hazards for our fishermen. The line that secures the dipnet to the skiff helps minimize those hazards.

Additionally, this proposal restricts the effectiveness of our only available gear by reducing mesh size, which targets sockeye salmon, further decreasing our harvest potential for our traditional sockeye. Proposal 175 imposes stricter limits on an already struggling fishery, leading to greater instability and financial difficulties for our families and communities that depend on commercial fishing.

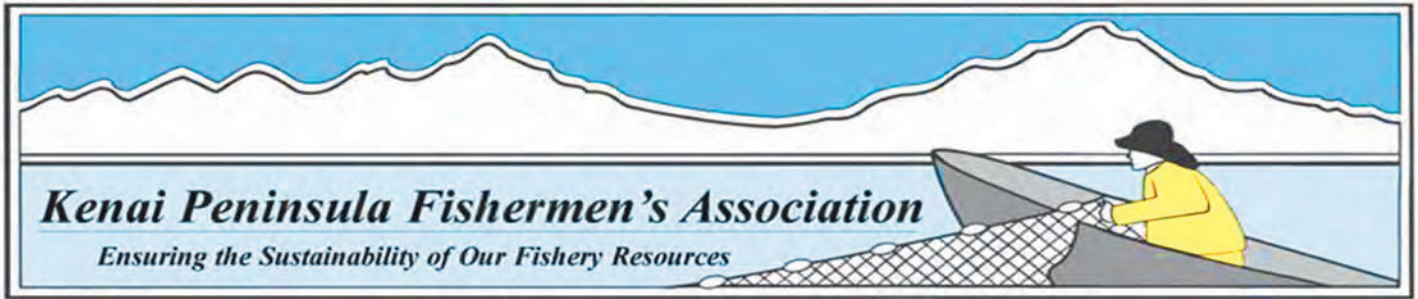
Dipnets already offer minimal access to the traditional sockeye salmon allocation historically harvested by Eastside Setnets for over 145 years. While current regulations on dipnets provide very limited opportunities for our fishermen, Proposal 175 would further restrict our gear and effectively eliminate our ability to meaningfully harvest fish.

Please oppose Proposal 175 for the ESSN fishing families.

Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors

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March 2, 2026

## Opposition to Proposal 175

Alaska Board of Fisheries,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited-entry permit holders, and is a registered 501 c(6). We also include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and individuals with a general interest in our membership.

The geographical area of the Eastside Setnet Fishery (ESSN) reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the fishery originate almost exclusively in the Kasilof and Kenai River systems. Some 440 limited-entry permit holders, each small businessperson, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents). The historic season usually runs from late June to August 15, but recent regulations and management have significantly shortened or closed it. Our fishery has been declared a fisheries disaster in 6 of the past 7 seasons and is under consideration for the 2025 season.

**We oppose Proposal 175**, submitted by the Ahtna Intertribal Resource Commission, which will be presented to the Alaska Board of Fisheries for consideration at the 2026 Statewide Finfish meeting scheduled for March 17-21, 2026, in Anchorage.

The Alaska Board of Fisheries (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024, while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow for the harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon recovery.

Proposal 175 seeks to change 5AAC 39.105. Types of Legal Gear which will directly reduce the legal gear for the ESSN fishery within 5AAC 21.382 Kenai River late-run king salmon stock of concern management plan. This change will reduce the only gear available to our fishermen under the commercial dip net fishery regulations in the Eastside Setnet fishery, until King salmon goals are projected in the current stock of concern management plan.

The reduced efficiency of dipnets compared to our traditional setnets is already a drastic reduction in our commercial fish harvest ability, and with the additional restrictions in Proposal 175, our fishery participants would be reduced to only the young and fit, excluding all other fishermen, family, and crew members from participating. It is discriminatory and creates extremely unsafe conditions for our fishing families.

The ability to hold a dipnet without having the assistance of the rope to hold it in some of the strongest tides in the world is beyond comprehension. The loss of gear or the risk of fishermen being pulled overboard with an unsecured net is a very real possibility. Dealing with strong tides, wind, rocks, surf, and hours in an open skiff poses many hazards for our fishermen. The line that secures the dipnet to the skiff helps minimize those hazards.

Additionally, this proposal restricts the effectiveness of our only available gear by reducing mesh size, which targets sockeye salmon, further decreasing our harvest potential for our traditional sockeye. Proposal 175 imposes stricter limits on an already struggling fishery, leading to greater instability and financial difficulties for our families and communities that depend on commercial fishing.

Dipnets already offer minimal access to the traditional sockeye salmon allocation historically harvested by Eastside Setnets for over 145 years. While current regulations on dipnets provide very limited opportunities for our fishermen, Proposal 175 would further restrict our gear and effectively eliminate our ability to meaningfully harvest fish.

Please oppose Proposal 175 for the ESSN fishing families.

Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors



March 2, 2026

Alaska Board of Fisheries  
Marit Carlson-Van Dort, Chair  
Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Public Comments by KRSA for Statewide Finfish and Supplemental Issues Meeting

Dear Chair Carlson-Van Dort and Members of the Board:

Kenai River Sportfishing Association (KRSA) submits these timely public comments regarding several proposals scheduled for consideration at the Alaska Board of Fisheries Statewide Finfish and Supplemental Issues Meeting in Anchorage, March 2026. KRSA is committed to ensuring sustainable fisheries management, promoting fair access, and supporting science-based decision-making in Alaska.

**Proposal #162 – Oppose** We believe that all Alaskans should be eligible to participate in Subsistence fisheries. Decades of debate since the adoption of the State Subsistence Priority have failed to establish a clear and consistently implementable definition of “noncommercial customary and traditional use” as it relates to means of access. In the absence of a clear, consistently implementable definition, it is our position that access should be encouraged rather than denied, especially when the resource in question has a significant harvestable surplus.

**Proposal #11 – Support** KRSA supports this proposal for two primary reasons. First, we agree with the author that any non-pelagic trawling has a high probability of habitat destruction and unintended coincidental mortality of important crab resources. Second, KRSA questions whether Alaska should continue to allow trawling in any State waters.

**Proposal #170 – Support** We support the general concept but prefer Proposal #172 as a vehicle for addressing this important issue.

**Proposal # 171 – Support** This proposal was submitted by KRSA as a vehicle for the Board to address the straying of pink salmon of hatchery origin from Prince William Sound into the rivers and streams of Lower Cook Inlet.

**Proposal #172 – Support** This proposal was submitted by KRSA as a vehicle for putting into regulation a moratorium establishing a timeout on any further hatchery expansion in light of significant concerns and uncertainty in negative effects of current programs. This pause would allow the Alaska hatchery study time to complete its work and for current information to be incorporated into policy and practice. This action endorses and codifies an informal policy decision by the Commissioner to not permit increased egg take for pink salmon hatchery production as reported in RC240 of the 2024 Upper Cook Inlet Board of Fisheries meeting. Without Board action, this informal policy could be set aside by a future Commissioner without regard for the current scientific information on hatchery effects.

**Proposal #175 – Oppose** We agree with the Department that the existing 4.5-inch dip net mesh size in regulation is sufficient to reduce incidental mortality of non-target salmon. We also oppose prohibiting the attachment of dip nets to a vessel absent a clear conservation or management benefit. We believe that disallowing dip nets from being attached to vessels could create significant safety concerns.

**Proposals #176 and #177 – Oppose** Party boat fishing, or “pooling” of catch on board a sport fishing boat, has long been unlawful. KRSA believes this practice should remain prohibited.

**Proposals #179 and #180 – Oppose** KRSA supports consistently conservative management of king salmon. However, we believe that bag limits should be adopted on a regional or management plan basis rather than statewide.

Respectfully submitted,



Shannon Martin  
Executive Director  
Kenai River Sportfishing Association

PC247

**Submitted by:** Michael Kennon  
**Community of Residence:** Homer

I am opposed to any hatchery egg permit reduction for salmon.

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PC248

**Submitted by:** Carmen Kiiguusix  
**Community of Residence:** Akutan

STOP ALL trawling in AK waters. AK constitution states resources to be protected and managed for residents/subsistence... not out of state enterprises or commercial interests. Kings and chums will either go extinct or can follow the turnaround seen in South America. I want my children to experience subsistence fishing since my ancestors have since time immemorial and expect leaders to protect these resources for future generations. Qagaasakung

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PC249

**Submitted by:** Jonathan King  
**Community of Residence:** Anchorage

Dear Alaska BOF,

I am writing in support of Supplemental Proposal 186 which seeks to reduce harvest in mixed stock areas of Cook Inlet during large Sockeye salmon runs in an effort to preserve the health of northern district Coho stocks and associated recreational harvest opportunities. As a practicing fisheries economist, a 20+ year Alaska resident, and a recreational angler I am concerned about the health of Susitna/Little Susitna and Anchorage area Coho stocks which have failed to make escapement goals in each of the past three seasons. Over the past 20 years my family, our guests, and I have taken dozens of guided angling trips injecting thousands of dollars in our local economy. Over the past half-decade we have watch Coho harvest opportunities shrink and the number of trips we (and our guests) have taken has shrunk proportionally. When we don't fish that money leaves the Alaska economy because we purchase substitute non-fish protein not raised in Alaska and we save our angling dollars for fishing trips during our warmer climate vacations. Your actions in support of Proposal 186 will increase the chance of healthier Coho salmon stocks and keep/attract valuable dollars to Alaska's economy.

Thank you for your consideration.

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PC250

**Submitted by:** Meghan King  
**Community of Residence:** Cordova

I am a drifnet permit holder based in Cordova, AK and have participated in the Area E commercial salmon fisheries since 2018.

I oppose proposals 170, 172, and 187.

I support proposals 164,165,174,185, and 180.

Thank you for your time and deliberations on these matters as they affect the commercial fishing fleet of Cordova.

Meghan King, Area E driftnet permit holder

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ben Kirk, and I am a fleet manager for Silver Bay Seafoods in Cordova, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would mean less job security and significantly less volume coming through the plant. Seeing as the company owns facilities in Seward and Valdez as well, I could see them closing the Cordova facility, as there would simply be no need to run it.

One less plant means the city earns less fish tax revenue, the power company loses a major customer, the fuel company loses boats due to fleet reduction, and the list goes on. Our towns are already struggling, and there would be businesses closing because they would lose customers who move elsewhere in pursuit of better paying jobs.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

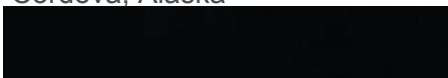
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ben Kirk  
Cordova, Alaska





March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Klepser, and I am a commercial salmon fisherman in Southeast Alaska. I have fished for 40 years and was born and raised in Ketchikan, Alaska. I operate the F/V Hannah Point and the F/V No Problem.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Hatchery production provides 70 to 80 percent of my income. Hatcheries provide relief for wild stocks when they are of low abundance. Fewer hatchery fish means higher targeting of wild stock salmon.

A production loss would be an economic shortfall for our community. It would mean direct job loss and a downsizing of hatchery releases, putting further pressure on wild stocks. SSRAA has a budget of approximately \$12 million and generates economic benefits of approximately \$52 million. That figure should be considerably more now.

These proposals would lead to the devaluation of state salmon permits and loss of vessel value. At every turn, they would put higher reliance on wild stocks and reduce fishing time and area, again making Alaska's salmon industry less attractive.

It is ill-advised to disrupt a hatchery program that has done exactly what it was designed to do — providing a resource to help protect wild salmon and provide the needed stability to make the industry better. Hatcheries have been a benefit to all users, from sport to subsistence to commercial.

In-river pollution and politics are the real issues that need addressing. Without the hatcheries, a lot of fishermen would be out of business. The stability they provide is the reason salmon is still a desirable occupation.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

David Klepser  
Ketchikan, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Donald Klepser, and I am a commercial and sport fisherman based in Ketchikan, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. A reduction in egg take would produce lower harvest levels, causing income instability. My livelihood is greatly tied to the production of hatchery fish.

With lower harvest, local communities would see a negative economic impact. Sport fishermen, both commercial charter operators and personal anglers, would see lowered bag limits. Many of the hatcheries provide king and coho salmon as well, which are largely produced for the sport industry. King and coho are the most expensive fish to produce, and with lower pink and chum production, the cost recovery models will not work and the king and coho programs will be discontinued. This would greatly affect the sport industry. The commercial salmon fisherman already faces a difficult time trying to survive between high fuel costs, high insurance premiums, and the cost of maintaining vessels and gear. With any hatchery reduction, fishermen and communities will see negative impacts.

A reduction in hatchery production by legislative action rather than science-based decision-making would open the door for other groups to attack any industry based on emotions and not science.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

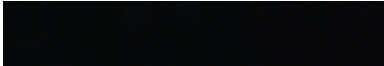
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framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Donald Klepser  
Ketchikan, Alaska



# Kodiak Island Tribal Coalition Foundation

"A Strong, Unified Tribal Voice for Our Future."

PC254



## BOARD OF DIRECTORS AND MEMBER TRIBES

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*Alutiiq Tribe of Old Harbor*

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Stephanie Brenteson  
*Kaguyak Village*

Gerad Godfrey  
*Native Village of Port Lions*

Alaska Board of Fisheries  
1255 W 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, AK 99811-5526

### Re: Opposition to Proposals 170, 171 and 172

Dear Madam Chair and Board members:

The Kodiak Tribal Coalition represents Kodiak's tribes on fisheries issues. We have reviewed Board of Fisheries proposals 170, 171 and 172 and recommend that the Board take no action on these proposals.

Proposals 170 and 172 are comprehensive, one size fits all proposals. Proposal 170, for example, would likely eliminate village coho and sockeye imprint programs in Ouzinkie and Port Lions that supply subsistence fish to both communities. Moreover, it would substantially reduce fishing opportunities for our tribal fishermen. A 25% reduction in Kodiak Regional Aquaculture Association's production would only increase the number of fish the Association would need for cost recovery and thereby reduce or eliminate the common property fishery for our tribal fishermen.

Proposal 172 is equally problematic. Kodiak Regional Aquaculture Association has wanted to incrementally expand enhancement projects on the East Side of Kodiak Island and specifically projects that would provide additional fish and fishing opportunity to fishermen working out of Old Harbor and Akhiok. For several years Old Harbor has been working to fund a hydro-electric project that would provide a year-around water source to support a small hatchery in Old Harbor – a hatchery has been planned for decades once the hydro project is completed. The blanket moratorium envisioned in proposal 172 would stop these types of important enhancement projects and will harm Kodiak's tribal members and Kodiak's rural villages.

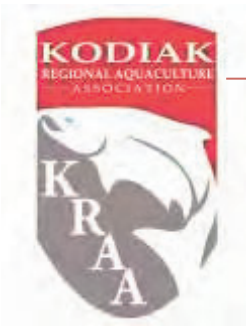
Finally, proposal 171 specific to Prince William Sound is best addressed by the Board and the Department of Fish and Game during the Prince William Sound board meeting. It's fact specific to that region.

If you have any further questions regarding Kodiak Tribal Coalition's opposition to proposals 170, 171 and 172 please do not hesitate to contact Alexandria Troxell at

Quyanaa,

Freddie Christiansen, Chairman

Natasha Hayden, P.E., Vice Chairwoman

  
www.kraa.org

To: Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

March 2, 2026

RE: Proposals 170, 171, 172

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for this opportunity to comment on and voice our **opposition to Proposals 170, 171, and 172** for the upcoming Statewide meeting of the Board of Fisheries in Anchorage.

These proposals, taken together, are simply a continuation of the senseless and arbitrary litany of proposals, mostly from the same authors, that have barraged the aquaculture associations and the Board since 2018. Not once in the last 8 years has the Board action to support one of these proposals. The proposals before the Board at the upcoming meeting have no greater merit, sounder footing, adequate regulatory framework, measurable objectives or outcomes, or supportable scientific foundation sufficient to inspire an outcome inconsistent with the Board's previous decisions to take no action on hatchery proposals.

In evaluating the proposals now before the Board, we ask that you also consider the very real harm that will be inflicted on the communities, the economy, and all the salmon users in Kodiak, Cook Inlet, Prince William Sound, and throughout Southeast Alaska should the Board elect to implement any one of them. The nature of these proposals would effectively insert the Board in any and all decision-making related to hatcheries and hatchery permits. It would upend the consistency and reliability of the process such that there would be no clear metrics for programs to secure their future, no ability to plan beyond the current year, no financial stability or framework that may not be disrupted, and no manner in which an association could be assured of their long-term viability.

### **Opposition to Proposal 170**

At each turn and in each region, the Board has rejected arbitrary, damaging, and unsupported cuts to hatchery production. Once again, in the form of proposal 170, there is neither more

evidence nor a solid rationale supporting the author's contentions. The science cited doesn't hold up to deeper scrutiny and has both an answer and a counter in the submissions made by the aquaculture associations for this and other meetings (See submissions by the PNP hatchery operators' group). The lack of rationale for this proposal is further demonstrated by data and information provided by ADF&G related to the Alaksa Hatchery Research Project, Salmon Ocean Ecology Program, and other topics & publications.

In addition to overall lack of merit, we have discussed many times the limits of the Board's authority and that there is no instance wherein a hatchery permit or permit number is stipulated in regulation. Permits are issued individually based on regional, stakeholder-driven decision-making and oversight by scientists and experts at ADF&G. The permitting process requires multiple levels of review, public process through Regional Planning Teams, and, by Statute, authority lies firmly in the hands of the Commissioner of ADF&G for ultimate approval.

As with previous proposals of this type, it is necessary to point out that the proposed cut to pink and chum salmon production has no basis or foundation for the percentage of the proposed cut. It's a completely arbitrary percentage with no stated expected outcome other than a desire for less hatchery production. What analysis was conducted to determine this percentage will be sufficient to produce a desired result beyond "less"? What benefit will be conveyed? How is that quantified? What is the measure of success? These questions have not been answered, and in fact, it appears uncertain what actual problem the Board would be addressing by approving such a proposal.

What we do know about the outcome of this proposal, should it be passed by the Board, is the harm that will certainly and immediately be conveyed to the people, fishers, communities and businesses across coastal Alaska from Ketchikan to Kodiak. ADF&G Staff comments submitted for this meeting cite a 10-year average ex-vessel value of approximately \$23 million for the fish that would be lost by approval of this proposal. When you factor multiplier effects of the loss of \$23 million dollars flowing through coastal communities as well as the loss in first wholesale value to processors, the lost jobs and the lost, related economic activity by support services, the 25% reduction in hatchery production will have an economically destabilizing effect in numerous Alaska communities.

By contrast, cutting a significant portion of Alaska hatchery pink and chum salmon production will have an almost insignificant effect on the overall biomass of pink and chum salmon in the North Pacific Ocean. Figures indicate that all salmon comprise about 4-7% of the aggregate of free-swimming organisms (such as salmon, herring, cod, pollock, crustaceans, zooplankton, and squid to name a few familiar species), or nekton, in the North Pacific Ocean. Of that 4-7% of the entire nekton, Alaska hatchery pink salmon make up about 2.5% of all salmon (0.1-0.18% of nekton) and Alaska hatchery chum salmon make up about 4% of all salmon (0.16-0.28% of

nekton). Within this context, a 25% cut to Alaska hatchery pink salmon would result in a potential 0.63% reduction in salmon biomass and a 25% cut to Alaska hatchery chum salmon production would result in a 1.0% potential reduction in biomass. In total, a 1.63% overall reduction in all salmon biomass (and a fraction of a percent of the larger nekton biomass) at the cost of the stability of Alaskan communities, Alaskan fisheries and Alaskan residents.

To simplify: to take such drastic action against hatchery programs without clear and conclusive scientific evidence supporting the need for such a reduction would be an act of deliberate harm to Alaska's fishermen and fishery-dependent communities with no clear benefit and no tangible nexus with any *potential* benefit.

### **Opposition to proposal 171**

Proposal 171 presents concerns related to Prince William Sound hatchery fish straying into streams in Lower Cook Inlet. Alaska Hatchery operators have submitted an updated synthesis of numerous scientific papers with emphasis on empirical and mechanistic science and explores themes such as competition, straying, and species overlap. When it comes to issues of straying in Alaska, however, the work done by the Alaska Hatchery Research Project (AHRP) likely provides some of the best information to-date.

The ADF&G Special publication 18-11 cited in the proposal was provided and discussed at the December 2019 Lower Cook Inlet Board of fisheries meeting. This information is not new. Perhaps one reason more discussion has not taken place related to this information is that closer inspection of Special Publication 18-11 and the presentation provided in 2019 (slide 19) indicates that if you exclude the samples taken Tutka Lagoon and Port Graham, *where the hatcheries are located and samples taken from streams would reasonably be expected to have high proportions of strays*, for 2014-2018, the average stray proportions of the samples for those non-hatchery creeks range from 0.4% to 7.8% over that 5-year period. That's a lot less than 34%;

With that information in mind and not wishing to imply that we should not pay attention to straying, it is important to note after more than 40 years of intensive hatchery production in Prince William Sound, and presumably the presence of straying hatchery fish, as well as a relatively low level of genetic diversity throughout Gulf of Alaska pink salmon, wild stocks in Prince William Sound retain identifiable genetic stock structure. This is strong indication that, even in years where higher proportions of strays could be present, hatchery stocks are not overwhelming wild stock systems. Additionally, there is no evidence that intermittent straying of hatchery fish into Lower Cook Inlet streams has had deleterious impacts on pink salmon populations or productivity in that region.



Beyond the facts or how data is presented, Proposal 171 is also problematic for its failure to provide a basis for the proposed 2% straying limit outside the long-argued and acknowledged-to-be arbitrary figure in the Prince William Sound Comprehensive Salmon Plan. The suggested mechanism to reduce straying is absent beyond “require changes” in production. It does not acknowledge the wide variability in stray proportions present in samples from year to year. It offers no implementable regulation or implementation scheme, acknowledges no timeframe, and it offers no measurable variables, no scientific review mechanism, and gives no supportable scientific basis. It claims a problem it does not support with evidence, proves no fact and offers no solution.

### **Opposition to Proposal 172**

As simple as I can make it, this proposal, too, claims a problem that does not exist and offers an unnecessary and un-implementable “solution,” for which the Board does not have clear authority. The ability and authority to make decisions about issuance of hatchery permits and defined permit levels lies with the Commissioner of ADF&G. If we acknowledge that, there seems no viable option for Board action related to this proposal.

The contention of this proposal is that the AHRP may not be complete and thus the initial study could still be ongoing at the completion of the current Commissioner’s tenure. Thus “something must be done” to constrain the, presumably, out of control hatchery operators from seeking huge production increases for pink and chum salmon immediately upon appointment of a new commissioner. The record doesn’t support that.

Should the Alaska Hatchery Research Project put forward conclusions that point to the need for programmatic and/or policy change, the Department has the authority to enact that level of change. The fact remains that the current process is vigorous, has checks and balances, allows for public process, and is not in need of unnecessary and unwarranted regulation designed to create and reinforce a false perception of problematic hatchery programs gone wild. There is no evidence to support this notion, and production increases have been few and far between in the last decade as most programs have reached their maturity. Additionally, the bar is already set very high for a facility to seek and support a permitted production increase. There are multiple levels of review, opportunity for public input, and the Commissioner has to approve each request. The permitting process for a new facility or new production has a bar that is set even higher.

At this point in time, Hatchery operators have agreed with the Commissioner that production increases are not on the table for pink and chum salmon; however, we vehemently oppose this proposal because, should the Board take action to promulgate regulations for a moratorium, that action would, in effect, insert the Board in decisions on hatchery production and operation. It would then open the door to the possibility that the Board could then promulgate regulations to

regulate hatchery operations not just in that way, but in every way. Side-stepping the clearly defined process and authority that exists in Statue would create a level of uncertainty in our operations and result in crisis for our organization. If the process of review and reliable procedure were upended, there would be no reliability and no inviolability to our programs. Our ability to apply for funding through the Fisheries Enhancement Revolving Loan Program during times of failure, loss, or for deferred maintenance needs, which relies on cost recovery and returning fish as collateral, would become uncertain. Thus, if the programs are uncertain, financial stability would be lost. The stabilizing force that hatcheries provide for fisheries and communities and processors would be lost. Our ability to provide programs that benefit subsistence and sportfishing opportunities would be lost. Our ability to conduct rehabilitation efforts, too, would fall to the wayside.

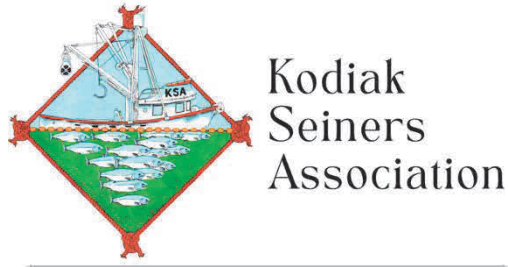
This last, rehabilitation efforts, is a particularly keen issue in Kodiak right now where we have a Chinook salmon run at Karluk that has been a stock of concern for over a decade and that has been struggling for nearly 20 years. In the last 3 years, a total of less than 500 fish have returned to the system. All conservation measures have failed to date, including closing the entire June fishery on the Westside of Kodiak. Hatchery methods are likely the only viable option left. Losses to Kodiak and Kodiak fisheries have already been heavy. People are on the verge of losing not just their fisheries but their way of life. I know this is a story not exclusive to Kodiak, but KRAA is poised to initiate an active rehabilitation project in partnership with ADF&G and one of our local partners, Koniag, Inc. who has long shared our concerns for this stock. A rehabilitation project is a long-term commitment and will never pay for itself. Grants and soft funding won't carry it through, and the Department is subject to state funding constraints and cannot offer long-term commitment or funding support. Right now, KRAA has to consider committing funds for decades to provide for this project. And right now, with our programs and our regulatory structure at stake, our ability to make that commitment is compromised by the uncertainty these constant proposals have introduced.

The net effect of Proposals 170, 171, and 172, individually or together would be a de-stabilizing effect not just on the hatcheries but on the aquaculture associations themselves. They put not just the programs but the people and whole communities at risk. The legislature created these programs and the aquaculture associations to provide benefit to all salmon users in our region. It is our hope the Board will reject these proposals and let us get on with it.

Thank you for the opportunity to submit these comments.



Tina Fairbanks  
Executive Director



The Kodiak Seiners Association, KSA, is writing in strong opposition to **Proposal 170**. Adoption of this proposal would dramatically reduce fishing opportunity for the Kodiak seine fleet, putting dozens of vessels out of business and resulting in a cascade of negative economic consequences for Kodiak. It is not clear what benefits would be conveyed from this proposal as no study has concluded that hatchery release volumes in the Gulf of Alaska point to the decline of any salmon population in the state, and it is even more uncertain what benefits would be derived specifically from reducing Kodiak's hatchery output. This proposal is haphazard, arbitrary and rooted entirely in speculation with the only known impacts from the proposal to be profoundly negative. KSA urges the board, once again, not to adopt this proposal.

Kodiak's hatchery program, while small compared to other regions, is a critically stabilizing component of our fishery. Our salmon fishery balances wild and hatchery stocks, relying primarily on wild production, with the strategic use of salmon enhancement to assure more reliable productivity for our fishermen and processors. We consider our fishery to be the gold standard for responsible management as demonstrated by its remarkably consistent productivity during a period where virtually every other region has seen volatility in their salmon runs. This consistency is largely contributable to a combination of a strong commitment to sustainability along with the small yet critically reliable production of our hatchery. Our hatchery chum production rarely exceeds 300,000 mature returning fish, but it has provided critical fishing opportunity fleet, especially now that our historical June sockeye fishing grounds have been closed for King salmon conservation. Similarly, our hatchery pink salmon production, which has largely gone unchanged since 1990, hovers around 6-7 million returning fish, a drop in the bucket compared to global pink salmon populations, but a lifeline for our boats and processors, especially on years of poor wild production, like 2018. Our hatchery also serves to focus seine effort away from wild stocks, creating a better distribution of the fleet and lowering the potential of exerting excessive pressure on potentially weaker stocks.

**Proposal 170** lacks a strong scientific foundation, and the Board should consider what, if any, positive impacts would be conveyed from limiting Gulf of Alaska pink and chum salmon production specifically. When reviewing the limited body of scientific studies examining the impact of hatchery salmon production on wild populations, it is clear that the scientific basis for the proposal is largely overstated. There is no "smoking gun" study that demonstrates a strong correlation between GOA hatchery production and recent declines in Chum and Chinook populations in Western Alaska and elsewhere. Hatchery releases of pink salmon from Kodiak specifically, and the Gulf generally have remained stable since 1990 and are thus unlikely a driving factor in recent Chum and Chinook declines. A 2015 study by Ruggerone, "Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean" estimated that hatcheries produced just 15% of total pink salmon

abundance. Since that time Russian pink salmon production has exploded, essentially diluting the contribution from our hatcheries. The proposed 25% production cut, though substantial for our local fisheries, would have a negligible impact on total salmon biomass in the North Pacific Ocean. In fact, these cuts would encourage Russia to continue to increase their hatchery production and more fry would be released into a marine environment where they may actually compete with Western Alaska salmon stocks, which in turn would exacerbate the conditions that **Proposal 170** intends to improve. The Board should consider what the *actual* outcome would be from adopting the Proposal, and whether that outcome aligns with its intended purpose.

Even studies that examine a decline in salmon body size, such as Oke's "Recent declines in salmon body size impact ecosystems and fisheries", found only a "weak link" between chum and king salmon body sizes and pink salmon abundance. That same study found that

*Populations from hatchery-intensive regions did not appear to show greater magnitude declines in body size compared to populations from other regions*

suggesting that GOA hatchery releases also have not negatively impacted salmon body size even in the regions where releases occur.

Ultimately, closely examining the body of scientific literature addressing interactions between hatchery origin and wild salmon stocks fails to produce any conclusive results that specifically address the proposers' concerns with Gulf of Alaska hatchery releases. The claims and therefore the expectations that the proposed cuts would convey any benefits to Western Alaskan salmon stocks are unfounded and are speculative at most. In fact, as stated above, adoption of the proposal would encourage increased hatchery releases from countries in the Western Pacific, already the source of the majority of hatchery origin salmon, while hamstringing our Alaskan coastal seafood economies.

We respectfully request you reject **Proposal 170**, as it would be irrational for the Board to adopt this proposal, as there is no available science to support the claims made within the proposal.

Sincerely,

Darren Platt  
KSA President

**Submitted by:** Soren Kokborg

**Community of Residence:** Cordova

My name is Soren Kokborg. I started gillnetting with my parents in Prince William Sound when I was 6. I have worked on various other fishing boats in and around Cordova for 8 years. Below are my thoughts on some of the proposals.

Proposal 170: I oppose proposal 170. It would have a huge impact on not only Cordova's economy but also affect hundreds if not thousands of families that live around Prince William Sound.

Proposal 171: I oppose proposal 171. The main bay hatcher produces a large chunk of my catch for the season, as well as providing my family with our subsistence catch for the winter.

Proposal 172: I oppose proposal 172. My community and I would lose our livelihood.

Proposal 187: I oppose proposal 187. The area is borderline unfishable during the fall and would put fishermen's lives at risk

Other proposals :

I support Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear:,

I support Proposal 165 – Require salmon excluders for pelagic trawl gear:,

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish:,

I support Proposal 175 – Dipnet mesh and configuration requirements:

Thank you.

Soren Kokborg

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3800 Centerpoint Drive  
Suite 700  
Anchorage, AK 99503

February 28, 2025

Alaska Board of Fisheries

Statewide Finfish Meeting — March 17–21, 2026 | Anchorage, Alaska

**Re: Opposition to Proposals 170, 171, and 172 — PNP Salmon Hatchery Program**

Dear Members of the Alaska Board of Fisheries,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has over 4,800 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has been working diligently on issues affecting the viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort. For our people, salmon is not only an economic resource — it is a cultural and nutritional foundation that has sustained Alutiiq communities for thousands of years.

Koniag respectfully submits this letter in strong opposition to Proposals 170, 171, and 172 scheduled for consideration at the upcoming Statewide Finfish Meeting. Koniag believes these proposals would cause serious, unjustified harm to the hatchery program that supports fisheries in our region and to the communities that depend on them.

Proposals 170, 171, and 172 would collectively impose a mandatory 25% statewide egg take reduction, region-specific production cuts in Prince William Sound, and an indefinite moratorium on any future increases in pink and chum hatchery production. Together, these actions would fundamentally dismantle a program that has operated responsibly for 50 years under rigorous state oversight — without demonstrating that hatcheries are causing the conservation harms the proposals allege.

Koniag opposes these proposals for three fundamental reasons:

- **No scientific justification.** None of the three proposals demonstrates a causal link between hatchery production and the conservation concerns they claim to address. Alaska's hatchery program is governed by a permit-based, adaptive management framework administered by ADF&G that continuously monitors and adjusts production based on data. These proposals would replace that proven system with blunt, arbitrary regulatory mandates — including a 25% production cut with no scientific basis for that number.

- **Direct harm to the Kodiak region and our Shareholders.** Kodiak's PNP hatcheries enhance fishing opportunities for commercial, sport, subsistence, and personal use fishermen across the Kodiak Archipelago, including sockeye, coho, and Chinook programs. Alaska's hatcheries support over 4,200 annualized jobs, \$219 million in annual labor income, and \$576 million in total economic output statewide. Mandatory production cuts would reduce harvest opportunity, destabilize fishing-dependent economies, and directly diminish the commercial, subsistence and personal use fisheries that Koniag Shareholders and Kodiak Island residents depend upon.
- **A dangerous precedent.** Proposal 172 would impose an indefinite moratorium with no defined review opportunities to determine whether the moratorium should be lifted therefore stifling review based on scientific data. This approach removes adaptive management tools, eliminates established public processes, including the Regional Planning Team process, and sends a damaging signal about the stability of Alaska's fisheries policy.

### Our Request

Koniag respectfully urges the Board of Fisheries to reject Proposals 170, 171, and 172. Alaska does not need to abandon its science-based hatchery management system to address unsubstantiated conservation concerns. The ongoing Alaska Hatchery Research Project and ADF&G's existing adaptive management framework are the appropriate tools to guide future decisions — not preemptive, blanket restrictions imposed before harm has been demonstrated.

The Alutiiq people's connection to Kodiak's salmon runs spans millennia. Protecting programs that sustain those fisheries today is consistent with Koniag's core values, particularly our core value to "Share the Catch" and to the region we were created to serve.

Sincerely,



Shauna Hegna  
President

**Submitted by:** Matt Kopec  
Whittier Marine Charters  
**Community of Residence:** Kasilof

Proposal 176

Proposed Amendment to 5 AAC 75.0XX – Saltwater Vessel Bag Limit

(a) Saltwater Vessel Bag Limit.

Please accept this submission in favor of proposal 176. This amendment will reduce release mortality and waste on all gamefish, but especially in the cases of rockfish and halibut.

Although rockfish release devices have proven to increase survival and I am a fan of utilizing them, they do not seem to work consistently on especially large yellow eye and other large species such as short rakers. Despite careful use with weights as large as 12lbs on a downrigger and a slow decent, these fish often resurface down current. Some common release devices are not strong enough for larger fish and sometimes there is no sign of why the release failure occurred.

Under current charter halibut regulations, when pursuing smaller fish (under 27", etc.) anglers are forced into a significant amount of sorting for a fish small enough. Furthermore, unless gear is changed while targeting these small fish (changing from the most commonly used 16/0 circle hook or a typical jig size to something significantly smaller), fish will often be hooked through the eye or through the top of the head by the standard Alaska halibut fishing hook.

If adopted, I believe that this amendment will reduce a significant amount of waste. Although I understand the argument that increased overall success could occur in some cases, in my experience, the benefits outweigh the potential downside. Additionally, this practice is realistically commonplace among unguided anglers.

Thank you for the opportunity to comment.

Matt Kopec

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**LINDA KOZAK**

• KODIAK, ALASKA

February 27, 2026

Chair Märit Carlson-Van Dort  
Alaska Board of Fisheries  
Juneau, Alaska 99811

Subj: Support for Proposal 11

Chair Carlson-Van Dort and Board Members:

Proposal 11 was submitted on behalf of the F/V Alaska Trojan, and I am also personally very supportive of this proposal. We are requesting that the Board of Fisheries prohibit groundfish trawling inside state waters west of 170° W. longitude in the Aleutian Islands to protect golden king crab grounds from large factory trawl operations.

This proposal is primarily designed to address habitat concerns and associated impacts by large factory trawl vessels in the Amendment 80 fleet, which range in size from 120' to 295'. In recent years these vessels have increased their activity on golden king crab habitat, including areas where females and sub-legal crab are concentrated. The encroachment into state waters is increasing.

Habitat concerns have been expressed by the fixed gear fleet and have been brought to the NPFMC Crab Plan Team and Scientific & Statistical Committee. Among the recent research priorities identified by the North Pacific Fishery Management Council is an urgent priority to conduct studies to assess the habitat impacts of bottom trawl fisheries in federal waters.

A major problem with acquiring information on adverse impacts to golden king crab areas is that the activity is taking place at the bottom of the ocean and we cannot visibly see the destructive nature of a trawl being hauled across the bottom over and over again. There is a need to exercise caution and be conservative in how these trawl vessels are allowed to operate. Rather than needing to prove harm to the ocean floor, we need research to prove that this practice is NOT harmful. Until that time, conservative management practices are warranted.

While it is difficult to quantify adverse impacts, in 2005 the North Pacific Fishery Management Council took a precautionary position and closed over 95% of the Aleutian Islands to bottom trawling due to concerns about impacts to benthic habitat. The Alaska Board of Fisheries has not yet taken action to protect golden king crab habitat inside state

Alaska Board of Fisheries  
Proposal 11  
Page Two

waters in the Aleutian Islands from bottom trawl gear and this proposal provides the opportunity to provide protections from trawl impacts.

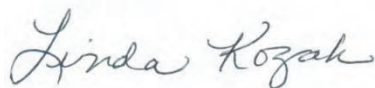
While concern for habitat protection is the primary purpose of the proposal, it is important to note that gear conflicts have been an issue and in recent years has increased. Factory trawl vessels are fishing in golden king crab areas and this has resulted in a loss of crab pots for the directed crab fishery. Even with a protocol agreement in place for notification of gear placement, factory trawlers continue to overrun crab gear forcing directed crab harvesters to move their operations. While much of this activity occurs in federal waters, there is some overlap into state waters.

There have been questions about golden king crab bycatch in the trawl fisheries. While it appears actual bycatch of golden king crab by the factory trawl vessels is minimal, we understand that observers only count whole crab as bycatch, not bits and pieces. There is significant concern about unobserved bycatch and mortality by these trawl vessels and the way they operate. While unobserved mortality cannot presently be quantified, we hear from crab harvesters that after a factory trawl vessel has been operating in an area, the directed catch of golden king crab goes down. Some of their traditional and historical areas are not as productive after trawling occurs. Did the crab leave because of the noise of the bottom trawl gear or were they crushed in the dragging process? Is their habitat impacted or destroyed?

The focus of this proposal is to exercise caution and halt fishing activity inside state waters by the large industrial factory trawl fleet targeting groundfish in the Aleutian Islands. Over 99% of their recent historical reported catch occurs in federal waters and we do not believe this action would result in a major impact on their operations, but could have a significant benefit to the golden king crab habitat and resource within state waters.

We request that the Board of Fisheries take action to prohibit large, destructive factory trawlers from fishing inside state waters in the Aleutian Islands in order to preserve and protect the important habitat for golden king crab and other species.

Thank you for reviewing and considering the proposal.



Linda Kozak

**Submitted by:** Michael Kramer

**Community of Residence:** Talkeetna

Support 170, 171, and 172.

Law re: Hatchery impacts on Wild Fish:

1974 Hatchery Act Section 1. INTENT:

"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."

5 AAC 39.222 Sustainable Salmon Policy requires that hatcheries shall operate without adversely affecting natural stocks of fish.

Comprehensive management plans state that straying should be kept to 2-3% because numbers in excess of that because over generations, mathematically beyond this the locally adapted genetics will be replaced with inferior hatchery genetics.

This has happened in many Cook Inlet streams, PWS streams and in many SE streams. Basically any wild stream within 50 miles of a release site has stray rates far in excess of 2-3% and Neither ADFG nor the RPT's they work closely with is ever going to voluntarily stop releasing fish within 50 miles of a wild stream. It is time for the board to take some meaningful action to address the statewide harm to wild fish caused by excessive hatchery production.

Contrary to ADFG's entrenched hatchery advocacy, the board should not require definitive proof of harm before hatchery practices should be critically evaluated or restrained. We make management decision all the time based on the precautionary principle and on the best available data. The best available data shows that straying rates beyond the previously acceptable 2% threshold reduces reproductive fitness and that hatchery fish compete with wild fish for limited inshore habitat and limited inshore and offshore food supplies.

One just has to look at ecosystem wide differences between even and odd years when the only obvious variable is adult hatchery pink numbers. We know in even years the food sources are poorer quality and most stocks, particularly Bristol Bay Sockeye, grow less in odd years than they do in even years.

Birds die off every odd year and killer whales do not reproduce due to nutritional stress.

The 2023 synthesis paper by Ruggerone, et al, leaves little doubt that the scientific community firmly believes hatchery fish negatively impact wild fish.

As cited in proposal 170:

"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."

The board has avoided addressing hatchery related conservation concerns for many cycles now, instead believing that the department knows best and the RPT's will somehow police themselves.

These 3 proposals all, in various ways, request that the board address whether the current permitted levels of chum and pin egg take should be adjusted downward in light of overwhelming scientific evidence, including ADFG's own hatchery research project's conclusion that excessive straying by hatchery pinks reduce reproductive fitness in the ensuing hybrid fish by >50%.

While less research has been completed on straying hatchery chums, the board only need to look at the Crawfish Inlet debacle to recognize that excessvie Chum production, and consequent straying, have had a detrimental impact on wild fish.

While the science regarding the impact of food competition is less conclusive, the precautionary principle requires conservative management until such time as we know that competition for food does not negatively impact wild salmon.

Correlation may not always mean causation, but the precautionary principle, the policy for the management of sustainable salmon fisheries, and the Hatchery Act all mandate that hatchery shall do no harm to wild fish.

Last year, ADFG, for the first time ever, imposed a meaningful restriction on the number of fish released by a pnp. This only came in response to the predictable devastation of West Crawfish Inlet wild chum caused by massive straying of 30 million hatchery smolts which were remotely released with ADFG's blessing through a hastily approved fish transport permit request from a SE pnp.

Proposal 170 seeks a blanket 25% reduction in egg take statewide.

This is not an arbitrary number. From 2000 to 2023 permitted egg takes by PNP's increased 28% without any board (or public) consultation or involvement. The RPT process involves hatchery operators and commercial fish interests strong arming the department to allow more egg takes, and more remote release sites.

If any board member disputes this characterization, please ask the department to explain the process leading to the Crawfish release approval in 2013.

The PNP wanted to release 50 million chums, the department was worried about straying impacts on important wild index streams in West crawfish Inlet and argued that only 20 million would be acceptable. The department later agreed to 30 million.

This hasty approval by ADFG was accomplished in "record time" according to the NSRAA, despite serious concern by ADFG about negative impacts on wild stocks which were clearly established in 2018 when hatchery strays accounted for 87% of the return to the West Crawfish Inlet Wild Chum Index stream, requiring its removal from the escapement count.

The ADFG Alaska Research Research Project recently made the following conclusions:

First generation hatchery Strays have lower fitness than natural origin spawners.

Second generation offspring of hatchery strays have lower fitness (carry over effect).

The West Crawfish region (Northern Southeast Outside) has failed to meet escapement goals for several years and is now a stock of concern.

In response to the Crawfish Inlet straying problem ADFG, in 2025, mandated a 25% reduction in release numbers.

This is from DVL in RC 90 from Feb 2 2025:

"The interaction between hatchery chum salmon and wild chum salmon is not definitively known to be the cause of the wild chum salmon declined production levels, but action to reduce the presence of hatchery chum salmon in the Crawfish Inlet area in appropriate. "

"Starting in fall 2025, I will reduce the Fish Transport Permit (FTP) permitted chum salmon egg take for release at Crawfish Inlet by 25% under the Sawmill Creek

Hatchery PNP permit, from 30 million eggs to 22.5 million eggs."

Someone should ask DVL why he chose 25% as an appropriate egg take reduction.

The department also required the joint SE RPT to:

"Conduct a review of chum salmon release strategies, release numbers, and release locations and report to the commissioner by December 31, 2025, their findings and recommendations regarding what is working well, what is not working well, impacts on wild salmon stocks..."

In response, the joint RPT issued the following:

"Impacts on Wild Salmon:

See each organization's research and evaluation program sections within their addendums to better understand regional research and evaluation projects and historical programs."

NSRAA has not and will never admit that their remote releases in crawfish or elsewhere have a negative effect on wild stocks.

DIPAC and ADFG have totally ignored the fact that Fish Creek, a wild chum stream on Douglas Island has documented stray rates in excess of 50%. That stream, and hundreds more, are not producing any wild fish and have not done so for many generations, yet no one seems to care.

It should be clear that leaving egg take authority to the RPT's will not comply with laws and regulations mandating protection of wild fish from negative hatchery impacts.

I understand the board will likely review 170,171, and 172 as a block and if it takes any action at all, it will be on significantly amended version.

I also understand it has rejected a wholesale 25% reduction many times in the past and that was recently pacified by DVL's promised actions spelled out in RC90.

We can't keep waiting for "definitive proof" of negative hatchery wild interactions or keep expecting the department of RPT's to self police. If the board continues to fail to exercise its egg take authority, we will continue to replace significant wild stocks with hatchery fish and given the proven fitness reductions from hatchery gene introgression, our wild fish may never recover.

For further background on the Crawfish Inlet Issue I have attached a letter I wrote to DVL and Bill Templin to which neither responded.

Instead of giving in to the argument that a blanket approach to local straying problems is not warranted, the board might consider targeted reductions in egg takes by PWSAC, due to documented stray rates far in excess of 2-3% in Cook Inlet and PWS streams, and NSRAA for documented excessive stray rates near many of their release sites.

Is the board going to continue abdicate its egg take authority and continue standing on the sidelines while our wild salmon are systematically replaced by hatchery chums and pinks or will it enact meaningful egg take restrictions before it's too late?

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Dear Doug,

Last year, you directed that the SE regional planning teams (RPT's) review their remote release sites. The Crawfish Inlet straying issue was the primary source of your concern. Following expedited approval by ADFG of a 30,000,000 remote chum release in Crawfish Inlet. straying rates in nearby wild streams exceeded 90% which required enhanced mixed stock fishing which negatively impacted 9 wild streams and lead to stock of concern status for the Northern Southeast Outer District

Here is what the Joint RPT came up with in its draft response to your concerns:

### 3. Impacts on Wild Salmon:

See each organization's research and evaluation program sections within their addendums to better understand regional research and evaluation projects and historical programs. It is imperative that we look at localized impacts as just that, localized, and adjust accordingly. A blanket Statewide approach to enhanced salmon production has no scientific or logical rationale. See Appendix 8 for the Alaska Hatchery Research Project information: The fishermen and industry have funded 72% of this 17.2 million dollar research project to date.

At the joint RPT meeting in early December, the joint RPT members declared that if ADFG wanted to provide a more meaningful response to you than the above, then ADFG should write it up. The addendums provided by NSRAA, SSRAA and DIPAC said nothing about any remote release site review.

Further discussion about your remote release site reviews was re-scheduled so that ADFG staff could do the work you assigned to the PNP's. Your staff added substantial information to the initial draft.

At the continued meeting on December 30, the joint RPT reluctantly agreed to the language the department wrote for them after several suggestions to soften any statements that tended to show any harm to wild fish.

Of particular interest was an attempt to scrub the only section that actually discussed remote release sites. That section reads as follows:

“High levels of straying of hatchery chum salmon from the

Thomas Bay release site in the NSEI subregion into Dry Bay Creek have also been documented (Piston and Heintl 2020; Piston and Fish 2024). While

sampling of historical chum salmon streams near the Port Asumcion release site on the west coast of southern Southeast Alaska has not occurred due to a lack of index streams in the area, this release site was permitted based on differences in run timing between the hatchery and wild systems, which helps minimize potential interactions.”

HATCHERY CHUM SALMON STOCKS  
 Hatchery production of chum salmon in Southeast Alaska has increased substantially over the past 4 decades. In 1980, hatchery operators in Southeast Alaska released 8.7 million chum salmon fry at eight locations; by 2023, this number had risen to 607 million fry released at up to 23 locations (Figures 5 and 6). Seven new release sites for chum salmon have been approved in Southeast Alaska since 2012.

Here are the locations of those 23 release sites. How could any wild streams be protected from straying?



Of the 23 remote release sites in SE, only three were even mentioned in the RPT report to you (that was drafted by ADFG).

With 23 release sites blanketing SE, Hatchery strays are going to introgress and negatively affect every wild stock in SE, and ADFG knows this:



Hatchery chum salmon straying has been studied in the region. Piston and Heintz (2012) reported in a three-year study of hatchery chum salmon straying in Southeast Alaska: “The proportion of hatchery strays decreased as distance from release sites increased. The mean proportion of hatchery strays in the 12 sampled streams located within 50 km of the nearest release site was 28.3% (range: 3.4–87.5%), and all samples that were composed of more than 40% hatchery fish were from these streams. The mean proportion of hatchery strays from streams located 50–100 km from the nearest release site was 8.0% (range: 0.0–17.8%). For streams greater than 100 km from the nearest release site, the mean proportion of hatchery strays declined to 3.3% (range: 0.0–16.6%).”

It is clear that ADFG made a huge mistake when it fast tracked the Crawfish Inlet FTP in 2013. It knew there was an important wild index stream within 20 km of the release site but blindly hoped, with no biological basis, that straying would be minimal or that different run timing would somehow mitigate the harm from straying. The average stray rate for streams within 50km was 28%

This is from the ADFG review of NSRAA’s application to approve Crawfish as a remote release site:

“Crawfish Inlet • No subsistence stocks; • No index streams and limited wild salmon production; • Outside of the Chinook high abundance area(s); • Adjacent to West Crawfish Inlet that has significant wild stock production of pink, chum, and coho salmon and provides for seine fisheries most years; • In a wilderness area; • Crawfish Inlet would provide a reasonably good sized terminal harvest area that likely would have minimal impacts on West Crawfish Inlet fisheries or other fisheries.”

[https://www.nsraa.org/\\_pdfs/Taylor/ADFG\\_NSRAA\\_Site\\_selection\\_Request\\_Response\\_FINAL\\_2013.pdf](https://www.nsraa.org/_pdfs/Taylor/ADFG_NSRAA_Site_selection_Request_Response_FINAL_2013.pdf)

Contrary to the poorly analyzed and fast tracked decisional document from ADFG, Hatchery fish accounted for over 90% of the escapement and slightly different run timing between hatchery and wild fish made no difference. As a direct consequence of the department appeasing NSRAA’s increased release ambitions, The Wild Chum stock of West Crawfish Inlet are no longer wild and it is no longer an index stream. The fish there now are all hybrids and as we will soon see in the upcoming AHRP fitness study, they will be >50% less productive with each succeeding generation.

DIPAC has similarly wiped out the wild genetics in Fish creek on Douglas Island after multiple generations of >50% hatchery fish predictably straying into that formerly wild fish stream from Macauley hatchery. DIPAC clearly has no

interest in discussing that. As you can see in the RPT report, Dry Bay Creek now has also been irreversibly inundated with hatchery genetics due to the FTP ADFG approved for Thomas Bay in 2017.

As to the Thomas Bay and Port Asumcion remote release sites, it was discussed at the meeting that the department did not require any otolith sampling from the commercial harvest when granting the FTP's for those remote sites so we will never know how many wild fish are being scooped up. Please consider requiring otolith sampling in any future fish transport permits you authorize for remote release sites.

The below two paragraphs is standard language found in most ADFG reports involving hatcheries:

“It was understood from the beginning of the program that wild and hatchery salmon would interact for much of their lives. Consequently, policies and regulations were adopted to alleviate concerns associated with this interaction (reviewed by McGee [2004](#); Evenson et al. [2018](#)). For example, according to Alaska’s Policy for the Management of Sustainable Salmon Fisheries ([2000](#)), “effects and interactions of introduced or enhanced salmon stocks on wild salmon stocks should be assessed; wild salmon stocks and fisheries on those stocks should be protected from adverse impacts from artificial propagation and enhancement efforts.” This and other policies addressing fish health, genetics, mixed-stock fisheries, escapement goals, and regional fishery management plans require the consideration of interactions among wild- and hatchery-origin salmon. “

Straying and introgression of inferior hatchery genes into wild populations has been demonstrated by the AHRP to result in >50% relative reproductive success in PWS first generation hybrid Pinks. In January, the ADFG genetic lab will finally present its RRS findings involving first generation hybrid SE Chums.

Below is a chart from West Crawfish Inlet (WCI) remote hatchery releases showing an average 45% hatchery stray rate into a West Crawfish Inlet stream which had, until it was removed in 2025, an important ADFG wild fish index stream to

determine SE wild chum escapement. As you can see, different run timing between hatchery and wild fish has little impact on introgression and after the first generation of hybrids, these runs will simply meld together.

SE hatcheries are systematically replacing wild chums with hatchery chums or hybrids. Escapements are mostly being met by straying hatchery fish or hybrids (although there are recently listed stocks of concern caused by the Crayfish disaster).

<b>WCI Stream Escapement - Expansions from Partial Counts and Otolit</b>					
		Est count - (new fish)	NSRAA	No Mark	
13-Aug	Reach 1	200	57	143	
13-Aug	Reach 2	300	125	175	
13-Aug	Reach 3	100	-	100	
		<b>600</b>	<b>182</b>	<b>418</b>	
20-Aug	Reach 1	350	200	150	
20-Aug	Reach 2	100	38	63	
20-Aug	Reach 3	50	35	15	
		<b>500</b>	<b>273</b>	<b>228</b>	
27-Aug	Reach 1	100	81	19	
27-Aug	Reach 2	50	44	6	
27-Aug	Reach 3	50	8	42	
		<b>200</b>	<b>133</b>	<b>67</b>	
			<b>588</b>	<b>712</b>	<b>1,300</b>
			45%	55%	

Doug, it took courage for you to reduce the amount of released fish in Crawfish Inlet and to order the pnp's in SE to conduct a remote release site review. They did not take you seriously however, and your department wrote the report for them. Still, they complained about the report being too informative.

The report only discusses 3 of at least 23 release sites. SE pnp's release over 600 million chum every year. We have known for many years that straying has a huge negative impact on nearby wild streams and the AHRP will soon tell us how much introgression of hatchery genetics has forever damaged the reproductive fitness of wild fish near release sites.

Consistent with the precautionary principle, I urge you to suspend all current FTP’s in SE until the Joint SE RPT does what you ordered them to do and they actually produce a comprehensive report on all their remote release sites and their potential impacts to wild fish either through increased mixed stock fishing, or by straying. Please also consider requiring otolith sampling of commercial harvests in or near SHA’s or THA’s at remote release sites to gauge how many wild fish are being incidentally exploited in these new fisheries.

I copy your geneticist and Bill Templin with this asking that they also not sign off on any future FTP’s without first having a sound scientific basis to believe that wild stocks will not be negatively impacted. If there is any wild stocks within 100k of a release site, we know there will be at least a 3.3% stray rate. This violates all the applicable policies that should be governing hatchery releases.

Table 3.–Key elements of Alaska fisheries management policies and regulations relevant to salmon hatcheries and fishery enhancement.

Sustainable Salmon Fishery Policy (5 AAC 39.222)	
I. Management principles and criteria	
<i>Assessment of wild stock interaction and impacts</i>	As a management principle, the effects and interactions of introduced or enhanced salmon stocks on wild stocks should be assessed. Wild stocks should be protected from adverse impacts from artificial propagation and enhancement efforts.
<i>Use of precautionary approach</i>	Managers should use a conservative approach, taking into account any inherent uncertainty and risks.
Salmon Escapement Goal Policy (5 AAC 39.223)	
<i>Establishment of escapement goals</i>	Management of fisheries is based on scientifically-based escapement goals that result in sustainable harvests.
Mixed Stock Salmon Fishery Policy (5 AAC 39.220)	
<i>Wild stock conservation priority</i>	The conservation of wild stocks consistent with sustained yield is the highest priority in management of mixed-stock fisheries.
Fisheries management review of FTPs (5 AAC 41.010 – 41.050)	
<i>Review by management staff</i>	All proposed FTPs are reviewed by the regional supervisors for the Divisions of Commercial Fisheries and Sport Fish, the deputy director of Commercial Fisheries, and the local Regional Resource Development Biologist before consideration by the commissioner of ADF&G. Department staff may recommend approval or denial of the permit, and recommend permit conditions.

Thank You, Mike Kramer

**Submitted by:** Thaddeus Krolicki

**Community of Residence:** Sitka

Re: Proposals 163–165 – Types of Legal Gear (Bottom Trawling Restrictions in State Waters), Statewide Finfish and Supplemental Issues Meeting

Dear Board Members,

I strongly support a complete shutdown of bottom trawling within Alaska state waters, as proposed. No one is denying the destructive nature of bottom trawling in many parts of the world, nor claiming it is the sole cause of any fishery decline. In fact, numerous trawl fisheries have been shut down or severely restricted precisely because of their documented damage to seafloor habitats, biodiversity, and unsustainable bycatch. Prominent examples include:

- The U.S. West Coast, where more than 140,000 square miles of seafloor habitat are now closed to bottom trawling to protect essential fish habitat, corals, and sponges.
- The European Union’s 2023 action plan to end bottom trawling in all Marine Protected Areas by 2030, with leading nations like Greece (full ban by 2030, starting in national parks by 2026) and Sweden (ban adopted 2025) already acting.
- International high-seas efforts, including the 2025 IUCN resolution calling for a phase-out of bottom trawling on seamounts (now headed to the UN General Assembly).
- Ghana’s 2025 commitment at the UN Ocean Conference and new fisheries law banning bottom trawling and industrial fishing practices in expanded inshore exclusion zones.

Many other nations have taken similar steps for the same reasons. These actions show that where the science and impacts warranted it, closures happened—and one would think Alaska state waters deserve the same basic protection.

The push for blanket closures doesn’t fall short. It’s the solution. The crashing Yukon and Kuskokwim salmon runs have zero trawling inside the rivers themselves. Yet those fish must migrate straight through the Bering Sea pollock grounds where the fleet operates. Genetic testing and observer data confirm that Western Alaska Chinook and chum salmon are taken as bycatch—thousands of fish in some years—even if that represents only about 1-2% of total mortality on average. When runs are already at historic lows (with Yukon chum subsistence fisheries closed for years), even that small, human-controlled fraction removes fish that rural communities desperately need for food security. It is not the main driver—climate is far bigger—but it is one we can actually manage and tighten.

The Alaska pollock fleet is already one of the most heavily regulated and monitored in the world, with bycatch caps and 100% observer coverage in many sectors. That is true and commendable.

Yet the North Pacific Fishery Management Council recognized this reality just last month (February 2026) when it voted to establish new Western Alaska chum salmon bycatch limits and partial corridor closures in the Bering Sea pollock fishery specifically to protect subsistence users. (I personally believe the measures as adopted will not meaningfully change outcomes, but the Council’s action itself proves the data justified addressing it.)

Past effort reductions have not rebuilt stocks because climate change is the dominant factor—that is correct.

And we’re presupposing that climate factor. Presuming it is; which there’s much evidence to show that the government has failed to acknowledge natural cycles in the climate over millennia, as documented in traditional ecological knowledge that is ignored by the state of Alaska and the federal government.

We have no control over the climate; but we do have control over our behavior, and fisheries management is charged with preserving the resource for all Alaskans—not just commercial trawlers. The trawlers need to bear

the burden of conservation along with the rest of the user groups. If subsistence is zero, bycatch should be zero. Hard stop.

No one is “picking a political villain.” (Though it is curious how quickly that label gets applied whenever anyone suggests the fleet should share the pain.) Alaskans are simply asking for the same consistent, science-based approach we already apply across every other stressor: climate, hatcheries, international interception, predation, freshwater habitat loss, and the bycatch/habitat effects of trawling.

Yes, the issue feels emotional when entire villages cannot put salmon on the table while the fleet continues to haul pollock. But the science is clear: we must manage all stressors, not just the ones that do not affect one particular fleet.

Supporting a full shutdown in state waters is the right first step. Let’s not pretend otherwise.

Thank you for considering this comment and for your service on the Board.

Sincerely,

Thaddeus Krolicki

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PC263

**Submitted by:** George Krumm

**Community of Residence:** Estacada, OR

George Krumm

Proposal 186 (in favor)

I am in favor of proposal 186.

It is clear that the indiscriminate harvest of northern Cook Inlet-bound coho (and other salmon) by the non-selective drift nets used to harvest (primarily) Kenai River sockeye salmon is having a growing, detrimental effect on northern Cook Inlet coho, chum and sockeye salmon. I think the status quo will result in the continued downward spiral of coho runs that used to be such a joy to sport fish and made Alaska such a great place to live-Places like the Deshka, the Little Su, the Parks Highway streams, and more. I think the continued interception/bycatch of these north Cook inlet stocks of salmon by the drift gillnetters is unsustainable, if we want to have enough coho in the streams to provide the great sportfishing we once had on these streams.

Undoubtedly, opponents to this proposal will bring up the dreaded "over-escapement " of Kenai sockeyes as a reason for shooting down this proposal. Please don't fall for that. The over-escapement model seems to be invalid as indicated by many consecutive years of Kenai River sockeye over-escapement over the past two decades. The over-escapement argument has proven to be weak at best and should not be used as justification to keep fishing sockeyes, while decimating northern Cook Inlet stocks of coho and chums through bycatch.

Sincerely,

George Krumm

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**Submitted by:** Cale LaDuke

**Community of Residence:** Sitka, Alaska

Trawling is on par with fish traps that once dotted the coastline of Alaska which were well on their way to destroying whole salmon runs but luckily were outlawed years ago.

Trawling indiscriminately kill fish of all species and mammals as well. Let's not forget just a couple years ago when they killed over ten orcas in one year, while at the same time the Southeast troll fleet were in court because they might be catching a fish that an orca in Washington might eat.

There is so much waste and pollution in this fishery it's disgusting, no other user group comes close to the amount of wonton waste produced by the trawl fleet. And if they did, they would be prosecuted for it.

This should not be a hard decision to make.

This isn't about closing the trawl fishery all together, it's only about holding them accountable and keeping them within the laws that were intended for proper management.

This is why I support proposals 163,164, and 165.

Thank you for your consideration on this subject as it is extremely important to our fisheries, our economy, our livelihoods and our way of life now and for future generations.

I hope you will make the right decision.

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March 2, 2026  
 Alaska Board of Fisheries  
 Statewide Finfish and Supplemental Issues Meeting

Propositions 170, 171, and 172: Opposed  
 Submitted by Michael Giovanni Leach

Chairman Carlson-Van Dort and Board Members:

Having grown up in Sitka, the importance of our commercial and subsistence fisheries to the community's survival was made abundantly clear to me. This is evidenced by my participation in the SE Alaska seine fishery for the past 7 years, deckhanding on the Sylvia Ann and Lucky Star through high school and college. With every intention of operating a seining vessel, I have and will depend on this fishery for my survival, along with many other fishermen.

Every season I worked, a majority of our revenue was earned through harvesting hatchery salmon. In 2025, over 80% of my employing vessel's catch were chum salmon harvested from Deep inlet. Without this cost recovery contract mediated by NSRAA, neither my captain nor crewmates would have been able to support themselves or their families. The revenue earned from hatchery salmon extends to gillnetters, trollers and seiners alike, who all rely on these fish to make a living.

The operation of all Alaskan salmon hatcheries attribute proceeds after operating costs to education and science-backed research (in partnership with ADF&G/NOAA), to support the sustainability of wild and hatchery fish synergistically. This directly contradicts the claim made by Proposition 172, saying hatcheries do not protect wild salmon from "adverse impacts from artificial propagation and enhancement efforts [5 AAC 39.222(c)(1)(D)]." Below are some standout quotes from NSRAA alone that highlight the conservative, science-backed approach they take to hatchery salmon production:

- 1.) NSRAA defines its core mission as the "utilization of the highest scientific standards' to promote the 'wise use of Alaska's salmon resources through education, sustainable harvest management, [and] the maintenance [and] protection... of high quality fish habitat.'"
- 2.) "NSRAA conducts and funds various Research projects which investigate a wide range of topics relating to salmon fisheries and biology to help us make informed, prudent decisions as fishery managers."



- 3.) “The proposals assert that hatcheries are contributing to widespread wild salmon declines through ocean competition, genetics, or ecosystem effects. However: hatchery production has been stable since 2019; declines in Chinook and chum are not uniform across Alaska; strong returns continue in many regions where hatcheries operate.”

Contrarily, Proposal 170 aims to reduce egg take by 25% statewide, without any scientific evidence to support it, and no case-specific adjustments for different areas of Alaska. This proposition is guesswork, as there are no verifications to ensure the effectiveness of it except through positive salmon population trends that already occur cyclically. This abandonment of evidence-backed decisions by ADF&G is a violation of their own sustainable salmon fisheries policies, emphasizing that “artificial propagation shall be managed conservatively with a precautionary approach in the face of uncertainty [5 AAC 39.222(c)(5)(A)].” A 25% reduction in egg take is neither conservative nor precautionary. This example set has translated into Propositions 171 and 172 with similar egg take moratoriums, created by the Kenai River Sportfishing Association, and should also be rejected as a result.

NSRAA is a small piece of a large puzzle in salmon hatchery operations statewide, and the overall 25% reduction in egg take through Proposal 170 would be detrimental to thousands of other jobs. Many processing companies and fishermen already hanging in the balance rely heavily on salmon harvests to continue operating. If we are to see a repeat of the industry’s \$1.8B in losses during 2022-2023, the additional reduced revenue from less returning hatchery salmon would result in the bankruptcy of entire processing companies and commercial fishing operations, not to mention hatcheries.

As the next generation of an already dwindling number of commercial fishermen, it is my duty to request that the Alaska Board of Fisheries make careful, science-backed decisions that protect the sustainability of salmon fisheries statewide. My dream is to own a commercial fishing operation. I rely on the salmon fisheries to survive, and if these propositions pass, my future as a commercial fisherman will no longer be realized.

I humbly ask that the Alaska Board of Fisheries protect the commercial salmon fisheries by voting down Propositions 170, 171, and 172.

Sincerely,



Michael Giovanni Leach

Sitka, Alaska



**Submitted by:** Pamela Leask

**Community of Residence:** KETCHIKAN

TRAWLING SHOULD BE BANNED IN ALL STATE WATERS & OFFSHORE FEDERAL WATERS. THE DESTRUCTION OF HABITAT, ECOSYSTEMS & EVERYTHING FROM THE SEABED TO THE SURFACE. OUR PEOPLE ARE STARVING BOTH INTERIOR & COASTAL, TO ALLOW TRAWLING TO CONTINUE IS KILLING ALL OUR RESOURCES. ANYONE WHO SUPPORTS THIS CARNAGE SHOULD BE ASHAMED. BAN TRAWLING, QUIT STICKING YOUR HEAD IN THE SAND BY IGNORING THE REAL UPIMPACTS.

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**Submitted by:** Grace Lee

**Community of Residence:** Cordova, AK

My name is Grace Lee and am a fisherman, fisher- wife, and proud fisher-family in our small community of Cordova, AK. As I have lived here for a decade now, I have learned a lot about commercial fishing, from fisherman to the processors to the biologists. What makes a fishery feasible and sustainable, is multifaceted. At the core of that, there is this one question: Can the product being harvested be delivered to be processed and then shipped out? If that basic requirement can't be met, there is no fishery, even if there is abundance in the species. I oppose Proposal 187. The set net fishery on the Tsiu and Khaliak rivers is a small, local fishery with only 4 vessels activity fishing at the peak within a 6 week season. Currently, they have to travel upwards to 17 hours to haul back fish to the nearest processor, delivering in Cordova, AK. This requires very specific timing as the stage of the tides and the bar coming out of the river can be very challenging. Let alone the other dynamics such as river currents, weather, ocean swell, icebergs and other fishing debris. Why would it be even considered to restrict and push these four fishing vessels up river where more challenges are met during active fishing as well as during transportation, when there is no biological numbers, science or hardship to allocate more to the sport fishing along those same rivers? Is there a current inability or lack of catch that is facing the sport fishing community in the Tsiu and Khaliak rivers because of four fishing vessels? Would putting pressure on them without any evidence be setting a dangerous precedent when it seems that "more fish for us" is the intent and not the proclaimed issues from the change of the mouth of the confluence? If this proposal was due to recent changes in the mouth of the river, then why was almost an identical proposal submitted in 2016 from the same person? It appears to me that this comes from a place of greed instead of science backed allocative planning. The fisherman, fishing family's, processors and biologist, who's job is to manage this exact fishery and make the best calls, all agree that this Proposal 187 is treading towards dangerous territory and should be shut down immediately.

I oppose Proposals 170, 171, 172 as there is no scientific evidence these hatchery cuts would benefit the pink salmon run and regional based management decisions for hatcheries is the more exact way to operate.

I support Proposals 164, 165, 174, 175 and 180. Specifically, proposal 180 continues the conservation efforts of King Salmon and would equalize the efforts for all user groups—not just in the commercial fisherman who have already been greatly constrained.

Thank you,

Grace Lee

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My name is Jason Lee, and have been a resident of Cordova, AK for about 20 years. I oppose proposals 170, 171, 172, and 187. I will focus my comments on 187 as I commercial and sport fish both the Tsiu and Kailiakh rivers since 2017. Set netting in the Kaliakh is a primary means to my livelihood. These rivers are remote and logistics to participate in these fisheries are as technical as they come by Alaska standards. As a group of 4, along with our deckhands, we have attempted to boat out our fish from these rivers to market, instead of preserve, salt or fly out fish, which were done in the past. As catch records show, we strongly favor fishing in the Kaliakh river. The Tsiu River is shallow where jet skiffs are needed to navigate. Commercial fishing in Tsiu river has a history of intense conflict dating back decades before our time. And as far as I am concerned, I do not desire to commercial fish in the Tsiu River. I have not launched a skiff in the Tsiu river for several years now. I mention this because this has been my compromise, something I personally already gave up (and our group as well) to keep peace with sport fishermen and lodges on the Tsiu. I have tried to be understanding of their needs, and also it has been easy enough to simplify our operations and thus have focussed solely on set netting in the KALIAKH river. Nevertheless I am opposed to closing the Tsiu River altogether, and I urge you to weigh this matter carefully as approval 187 would be cutting off future generations from their ancestral, cultural and commercial fishing identities-these being the youth of Yakutat and Cordova areas.

Specifically, I would like to now direct my comments towards the KALIAKH River, and describe our methodology and the unique and dynamic factors (meaning there are a lot of forces affecting logistics) that govern our pursuit to set net THE KALIAKH RIVER. Again this is the river we specifically want to defend our right to fish. Proposal 187 would potentially CLOSE 820-1000 YARDS OF THE KALIAKH RIVER or more depending on the shape of the confluence, width of the river, or whether or not there are multiple braids-ALL POSSIBLE SCENARIOS. This proposal is written in haste, is reckless and damaging to otherwise good relationships between us set netters and the sport fishermen we interact with and there has thus far been NO consideration of consequences to its neighboring user group, us, the Kaliakh set netters. (again we represent 4 boats and our deckhands). This type of proposal, in its essence is seeking to eliminate a user group, creates a hostile environment and should not be given consideration by the BoF, meaning it would (if adopted as written) thoroughly displace and take away reasonable opportunity to the ONE AND ONLY user group on the Kaliakh river, us. Both historically, and in recent years since 2017, there have been NO CONSERVATION OR ESCAPEMENT CONCERNS in either river, there are NO PRECEDENTS LIKE THIS SET BEFORE (rivers on the dynamic lost coast change constantly and occasionally merge to form a confluence), never has a confluence been taken up as an ACR and never has the BoF taken permanent action and SUPERCEDED ADFnG's authority to manage in season based on abundance, escapement and effort. And if this Proposal was adopted, there could be no in season REVERSAL, no matter the abundance present, in the Kaliakh river where we are the ONLY USER group present. To recap, this is a weighty matter, if adopted we could NOT safely fish in the Kaliakh, and this stock would go unused once again.

I feel it is time for a description of what we can and cannot do in this fishery, which relates to our methodology as set netters. We use modern day bow pickers to access this resource, and we

drive them from Cordova. We do NOT fly fish out, as was the previous methodology. I want to highlight to the board, the nature of this endeavor to drive a bow picker from Cordova with ice and gear, fish the Kaliakh, and return to boat the fish to market. I trust you are all aware of the dangers of traveling this long in the open and exposed gulf of Alaska, on relatively small, 2 person vessels, and this operation requires for alignment several unforgiving logistics, with the most being weather and sea state (waves): our track record of participation has been ultimately decided by whether or not it is safe to travel down and then proceed to cross the bar: the line of breakers separating the exposed ocean from the inside river. IF WEATHER allows us to make it this far and participate in this fishery, then it certainly allows planes to fly AERIAL SURVEYS. The department reports that funding for aerial surveys of the Tsiu river remains strong. Tsiu River is clear and fish are easily counted; Kaliakh has light silt and counting is difficult by air. If there was one key I would like to direct the boards attention to, it would be this. Aerial surveys are the KEY to IN-SEASON management. Aerial surveys as well as catch reports, provide the Department with run strength estimates AND ensure all user groups have adequate access to the stocks. If any restrictions on any user groups needs to occur, it should happen based on these aerial surveys, not the claims of the author of 187. Again, if weather allows us to run our boats from Cordova, it would ABSOLUTELY allow the department opportunities to fly aerial surveys. As you know, the Department restricted set netters to within 100 yards of the confluence during the 2025 season. I am not aware if there has EVER been ANY kind of restriction placed on the SPORT USER group, in the TSIU river, my guess would be there has never been any restrictions to sport harvest which speaks volumes to the strength of this run, and should be a caution to any IRREVERSIBLE or PERMANENT action taken by the Board at this time. Truly, there aren't many, if any, coho fisheries like this ANYWHERE in the state, that experience such low fishing pressure, from all user groups.

I want to elaborate a bit on our boats. They are in the 30-32 foot range. Big enough to handle open ocean travels, but small enough to be maneuverable in tight and shallow areas. When we first began fishing the Kaliakh we first tried to fish upstream in the upper reaches. We quickly found this to be extremely risky and dangerous as the river is shallow and swift. Between getting stuck and sucking up sand, overheating, and ruining our impellers with gravel, the area directly above the targeted area in prop 187, is UNFISHABLE with our boats. The only fishable section of the Kaliakh River for us, is the 'river bend' where she dumps in to the ocean. Mike Webber elaborates on this in his comments. It is a place where the river slows down, is deeper, and is quickly affected by tidal action. (We cannot pick our nets at low water.) This also happens to be the exact area that Proposal 187 targets, this represents an access to our livelihoods and I please urge you to act carefully and consider what is at stake for us and our identities, and vote this proposal down. It has been an extremely difficult circumstance to endure this process thus far and feel relatively helpless. I know in my heart there is a workable path forward through clear communication and continued and fluid oversight from the Department. The bottom line in this discussion is that there are enough fish for all user groups and no conservation concerns. I can understand frustration from all sides, that with this confluence we are suddenly neighbors, fishing 100 yards away from each other, where we used to have the river of our choice to OURSELVES. Following area biologist Richard Hoffman's request to re continue annual MEETINGS amongst stake holders will be beneficial as well.

Another key factor to be understood is that EXACT NUMBERS and data rarely occur in AREA D. What I mean is: Area D is incredibly vast, largely remote, and with rivers in close proximity to each other such as the Tsiu/Kaliakh, Italo/Akwe, or Manby Shores to name a few, management takes broad strokes to allow opportunity, and backs up actions with AERIAL SURVEYS. It is true we are intercepting Tsiu bound fish when we fish the Kaliakh River, and always have been based on the close proximity of the rivers as fish move in and out of the rivers. I can understand a small degree of initial concern from the board, which warrants closer inspection: This interception of fish occurs in a geographically SMALL AREA, WHEREBY the number of possible set nets fishing is regulated by statute 5 AAC 30.335 which sets the minimum distance between set nets at 75 yards. The Kaliakh and Tsiu join, and flow directly in to the ocean and its formidable breakers (see attached photos with yellow lines drawn and distances given for reference). The general impact of 2 set nets fishing in the Kaliakh below (and 2 set nets above) the confluence, on the overall escapement of the author's Tsiu River, is minimal, and closure of an entire 800-1000 yard section of river (above and below confluence) is CATOSTOPHIC for our operations. In other words, interception of Tsiu fish in the Kaliakh river is minimized by a short geographic distance of river, AND statute 5 AAC 30.335 limiting the amount of nets that can fish in that area. There may only be two or three set net sites downstream of the confluence, but they represent our only access to Kaliakh (and by nature some Tsiu) stocks. The impact of these fishing sites on our families livelihood is immense! 820-1000 yards of closed waters, as it relates to the Kaliakh river, at the river bend and subsequent confluence is both an arbitrary and an EXTREMELY long distance. I support the Department in closing up to 100 yards, but anything more puts our operations at risk. I'd also note in precedents of other rivers joining in area D, sport fishing has at time been concurrently closed in confluences as well. Im not asking to close sport fishing near the confluence of the Tsiu/Kaliakh rivers, rather highlighting the one sided approach that the author has presented the Board.

I'd like to add further comment on the unknown number of Tsiu fish we are catching, while fishing in the Kaliakh river. The EXACT NUMBER of Tsiu fish, though unknown, needs to be interpreted within the context of the historical carrying capacity of the Tsiu (specifically) and also the Kaliakh. Both rivers present robust historical catch and participation records dating back decades and even centuries where 30-40 permits consistently fished both of these rivers. We represent 4 permits. We are a team of 4 boats. And again, the key factor, the bottomline that you the Board of Fish, the Department, and all users can hang our hat and depend on, are the aerial surveys flown by the department. The subjective claims of one user or lodge owner, should not carry more weight to the board than the Department's database of observed escapement, as fisheries have been prosecuted for decades. Robust sport fishing opportunity occurs easily and readily as the run comes in and escapement numbers are achieved. If you have ever sport fished these rivers like my son and I have, you know it's easy to catch a coho on a rod and reel period. The water is clear and fish are easily spotted and targeted. Generally speaking, when run entry tapers at or just after peak season, we are always the first user group to leave as our thresholds of large operating overhead (namely fuel, constant machinery wear and tear, and my 17 percent deckhand) do not allow a profit. A look at our participation records

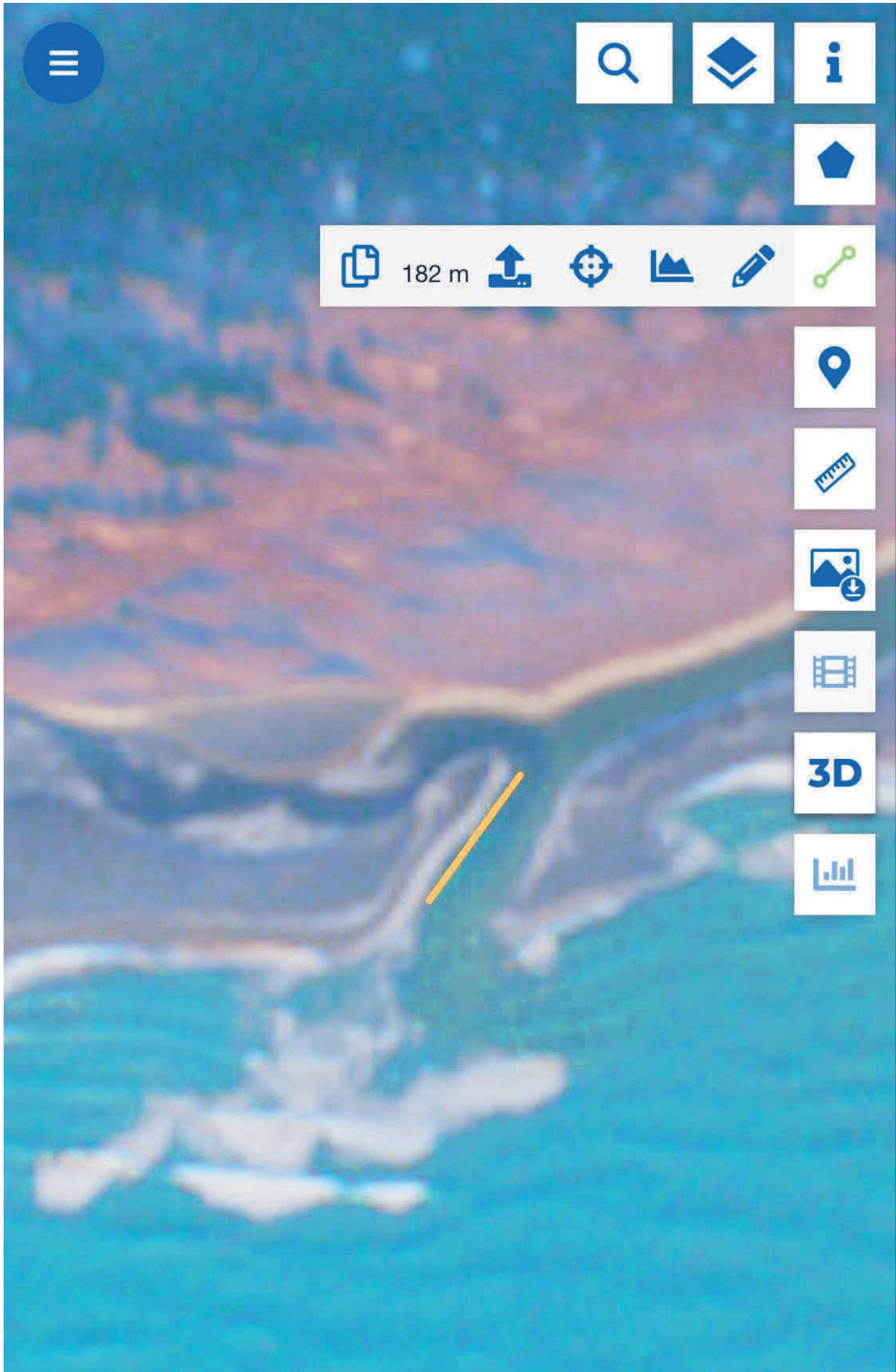
shows that we are not able to fish much after the peak of the run. This does not turn in to a 'competing for fish' situation and never has, due to that fact that if we are able to spend all that money to get down there, we are counting on enough fish to cover overhead. In lay man's term, this is NOT a scratch set net fishery. The lodge owners can speak that they are always alone to finish out the last few weeks of the season. It is also common knowledge to any set netter, that fish see our nets, and swim around for an incredibly high survival rate. The water clarity in the Kaliakh is in the ballpark of 5-6", this is enough for fish which steadily progress upstream, to see our web and turn and dart; this is commonplace. It is entirely possible that the author's motivation for Proposal 187 is based in part to perception that a set net, blocks fish from passage. Any experienced set netter knows this is not the case, and I add our testimony that we have sport fished in the Tsiu, while our nets are deployed in the neighboring Kaliakh, and have continually caught coho after coho on rod and reel.

There is no action that the board of fish could take at this meeting that would supersede or replace the efficacy of the ever changing, swift and ultimately EFFECTIVE management actions that the department HAS ALREADY SHOWN they can enact, in order to prosecute a fishery in an equitable and fair manner amongst user groups. Please carefully consider how this proposal affects the small set net user group, fishing on the geographically small section on the Kaliakh River and reject proposal 187.

We embark to set net the Kaliakh both for financial reasons as it is our livelihood, but also for spiritual reasons of adventure, pioneering and furthering the human spirit. This fishery is one that is best served to close team members, (as we have 4 in our group) and ever embodying the all for one and all for one mentality. In our pursuits we've blown motors, towed each other home in harrowing circumstances, and hauled dead bodies back to town. Enduring is the nature of the beast down in this country, but action from the Board on 187 would be insurmountable for our group to continue to pursue our livelihood.

I apologize for my lengthy comments, but until now I have worried greatly that this our unique fishery has not been entirely understood outside of our small family of fishermen, Richard Hoffman, our biologist whom we work closely with, and our close friends on the market side, Camtu's Wild Alaskan Seafoods. I hope you have found my comments helpful and sincere, as I know you all have lifetimes worth of experiences examining all sides. Please carefully read and get to know Mike Webber at this meeting; he has been our quiet spiritual leader and guide from the beginning. He provides constant insights that shape our every move, and together we form a complementary team, which is necessary for safe and ethical operation. I'll conclude that the Kaliakh fishery has been an incredible, life enriching experience and has shaped our identity as coastal Alaskans for me and my family; please oppose 187.

Attached picture shows Kalikh River on right and Tsiu River on left, yellow line represents 182 meters. This is satellite imagery from Copernicus Browser from February 2026.



**Submitted by:** Merrik Lee

**Community of Residence:** Cordova

My name is Merrik Lee, I am 11 years old and in sixth grade. I oppose proposal 187. I have a set net permit and I fish the Kaliakh river with my dad Jason Lee. For the past two years I have set netted on the Kaliakh and sport fished on the Tsiu in August before school starts. I help my dad set net and at least once a day go sport fishing on the Tsiu. It's so much fun. I earn money with my crew share and bought a new mountain bike this year. Please dont close the Kaliakh river because I hope to keep fishing for a lot more years and maybe do it when I get older. My dad says if 187 is passed we would have to fish in the breakers or up river where it is too shallow and we never go.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Leese, and I am a commercial fisherman in Southeast Alaska. I annually harvest fish returning to multiple hatchery sites and fish aboard the F/V Polarland through Premier Seafood Inc.

Proposals 170, 171, and 172 abandon Alaska's science-based management priorities in favor of blanket regulatory actions without clearly proven causal rationale. Collectively, they would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrative evidence. If implemented, they would damage my business viability and harm my family's livelihood as we enter our fifth generation in the fishing industry with my adult children.

These proposals would reduce harvest opportunity and create unnecessary economic instability. They represent broad-based solutions to problems for which causes have yet to be proven by the Regional Comprehensive Salmon Enhancement Plan. If there were proven damage to wild stocks or other region-specific impacts, a targeted, species- and region-specific response would be appropriate. Broad reductions without that evidence are highly suspect.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

William Leese  
SE AK, Alaska



PC271

**Submitted by:** Eric Lehm

**Community of Residence:** Homer

I'm writing in support to proposal 176 for cumulative bag limits on saltwater vessels. This proposal seeks to make a vessel bag limit rather than individual bag limit and for times of low abundance, running charter boats this would severely decrease the number of fish that we catch and release in search of our under 27 inch fish. Thanks you

I am writing in opposition to proposal 183. As a charter operator and Homer resident, I believe that this proposal will cause severe problems for our facilities around the Homer Harbor to manage all of the extra fish carcasses that will be generated by this proposal. I believe the original intent of this proposal was retention of any fish with a size limit. Which I am in favor of, but as this is written retention of all carcasses, I'm against this proposal as written. thank you for your time.

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PC272

**Submitted by:** Don Lesco

**Community of Residence:** Anchorage

I strongly encourage the board/panel to adopt Proposal 186 plan. By doing so the proposed plan 186 could boost salmon returns to all Upper Cook inlet drainage this summer and beyond

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Members of the Board of Fish,

Thank you for the opportunity to provide testimony on this issue. I am the owner and operator of a 58-foot combination fishing vessel based locally in King Cove, Alaska. I have historically participated in the pollock and cod trawl parallel fisheries within state waters. I oppose proposals 163 and 164.

Data clearly show that 58-foot vessels are heavily reliant on access to state waters for pollock and cod harvest. Over a ten-year average, 95 percent of the pollock harvested in state water was by 58-foot vessels, and the historical average remains high at 86 percent. For cod, the ten-year average harvested in state water by 58-foot vessels is 91 percent, and the historical average is 89 percent. These figures demonstrate that state waters are not a marginal component of our operations—they are essential to our survival as working vessels. This is further amplified by recent restrictions passed regarding salmon opportunities on our vessel.

As a local 58-foot vessel, eliminating trawling inside state waters, in any capacity, would effectively put us out of business. Our participation in the parallel fishery is shaped by real-world constraints, including vessel size, hold capacity, safety considerations, weather limitations, and market conditions. These factors make access to trawl opportunities in state waters not only practical, but necessary for continued operation.

I would also like to address assumptions being made about trawl gear and bottom contact. The Gear Innovation Initiative (GII) is a comprehensive, ongoing project that is cataloging every pelagic trawl in Alaska. This initiative uses detailed trawl geometry and extensive variables to determine whether, and to what extent, bottom contact is occurring. While it is often assumed that 100 percent of tows in the Western Gulf make bottom contact, this assumption is simply not accurate. The GII is designed specifically to provide objective data to clarify this issue.

Given that this extensive research effort is already underway and is intended to provide factual, science-based insight into trawl performance and impacts, I respectfully ask the Board to refrain from taking action at this time. The results of the Gear Innovation Initiative will shed important light on these matters and allow for informed decision-making based on evidence rather than assumptions.

Thank you for your time and for considering the perspectives of local fishermen whose livelihoods depend on balanced, data-driven management decisions.

Respectfully,

Ben Ley

Owner/Operator, F/V Cape St Elias

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Linda Lichty, and I am a community member in the Ketchikan area. If access to fish is reduced, it would impact me and my family through reduced food availability, especially with grocery prices and taxes increasing.

If access to fish were reduced, it would also mean fewer processing workers, which would then impact my husband's job as a retail manager. It would also mean general income loss to other businesses that rely on fishermen for sales.

I think there is a risk of low fish runs that will impact us for years. Why put the cart before the horse? You have smart people doing research, and they should be able to finish before making a decision. This is a big decision that needs more research by qualified professionals.

Trawler bycatch affects all, and we should start there.

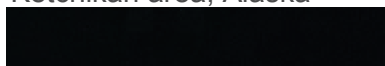
I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Linda Lichty  
Ketchikan area, Alaska



**Submitted by:** William Lindow

**Community of Residence:** Cordova

I am opposed to proposals 170, 171, and 172.

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**Submitted by:** Trae Lohse

**Community of Residence:** Cordova

I strongly oppose Proposals 170 and 171. Hatcheries have become a critical part of the economic and social fabric of many coastal fishing communities in Alaska. These communities are already under pressure from rising costs of living and volatile seafood markets. Cutting Alaska's hatchery production by the drastic amounts suggested would create severe economic ripple effects; hurting commercial fishermen, processors, schools, harbors, utilities, local governments, and the many small businesses that depend on a stable fishing economy.

Reducing Alaska's hatchery output will also do nothing to address the far larger hatchery production occurring in Asia. The overwhelming majority of hatchery-origin chum salmon interacting with wild stocks in Western Alaska waters come from Japan and Russia, not Alaska. That will remain true regardless of any cuts to hatchery production made here at home.

These proposals are a shot in the dark, unlikely to improve struggling salmon runs, but certain to increase hardship for fishing families in Southeast and the Gulf of Alaska and the communities they support. Alaska should not undermine its own coastal economies with measures that offer no realistic biological benefit.

**Submitted by:** Tyee Lohse

**Community of Residence:** Cordova

170, I oppose this proposal! A 25% reduction of pink and chum hatcheries statewide. This Proposal will have rippling effects in Commercial, Subsistence, and Sport fishing. Revenue from pink and Chum salmon production funds Chinook, Sockeye and coho programs. These programs provide sport and subsistence opportunities for many Alaskans. This reduction would eliminate funding for these programs, in addition there is a large economic gain from these fish to the state and the communities that it supports. There is no unbiased science that indicates competition between hatchery pinks and wild Chinook and Chum salmon. Pink fry provide a food source for larger aggressive species. Therefore taking pressure off of wild stocks. 171, I oppose this proposal, this is an attack on commercial fisherman by a user group that wants to do anything to damage the commercial sector. The data supporting this proposal is outdated and based on one returns observations in a biased study. 172 I oppose this strictly on principle, the hatchery par request process is a strict process based on science with the state of Alaska. At this time neither the state nor the hatcheries are entertaining increases in production. 176,177,178 I oppose these proposals, bag limit needs to be per angler not per group. Bag limit is set per person. I should not be in my bunk well someone else catches my fish for me.

**Submitted by:** Oystein Lone

**Community of Residence:** Arlington Washington

Please stop all bottom trawling inside 3 miles this travesty has to stop we all know what is going on and destruction this fleet has done. It's time to put a stop to this. I'm a 35 year fixed gear Alaska fishermen I have fished Salmon all over Alaska, Hallibut Black cod Herring and just about every crab specie all with fixed gear. I have seen nothing but destruction by trawl fleet. Please stop this.

**Submitted by:** Cory Loos

**Community of Residence:** Homer

Good afternoon, I'm writing this today to oppose proposal 186. I find it very difficult to comprehend how broken the system is to even allow this major of a proposal and how severe of consequences it would cause if this passes. After the recent coho stock assessment released by the state. Science proves there is no facts that support a conservation corridor is helping or limiting the number of mix stock or cohos caught in a specific area. There is no benefits to any users groups with these corridors. If anything it's causing more harm. Operational flexibility should be taken into account, spreading out the fleet across a LARGER body of water will cause less harvest of mix stocks. Putting the fleet into smaller bodies, will cause greater harvest of those mixed stocks when they enter those smaller body's of water . Proposal 186 will force the fleet into smaller areas , the wrong areas. Science doesn't support 186. With very large runs of sockeye projected for 2026, taking action on this out of cycle will cause catastrophic results to the drift fleet which is made up of 80% local Alaskan, the the processors, the rivers and worst its setting a prescient that the board of fish cycle and the process is completely broken.

**Submitted by:** Christopher Lujan

**Community of Residence:** Anchorage

I wish to see the board of game end trawl nets that drag bottom, even so called "mid-water" trawlers.

I also wish that trawler fish caps would be set at numbers of fish, not weight.

**Submitted by:** Taylor Lundgren

**Community of Residence:** Sand Point

Dear Chairman Carlson-Van Dort and Members of the Board,

My name is Taylor Lundgren, and I am a commercial fisherman from Sand Point, Alaska. I am writing to respectfully oppose Proposals 11, 163, 164, and 165.

As a small boat owner and operator, I work on a limited budget and do not have the same financial flexibility as larger vessels. We cannot continue to conform to regulations designed for or more easily absorbed by larger operations. Additional mandates, monitoring requirements, and gear modifications place a disproportionate burden on small operators like myself who are already operating on tight margins. Our vessel already operates with a camera monitoring system in place, as well as both halibut and salmon excluders. We are already complying with strong bycatch mitigation and accountability measures. Adding further equipment mandates or redefining gear classifications would increase costs without clear biological justification, while penalizing fishermen who are already making responsible investments in conservation and compliance.

Proposal 163's redefinition of trawl gear shifts the burden onto fishermen to prove gear performance, creating unnecessary complexity and enforcement challenges. Proposal 164's mandatory bottom-contact monitoring requirements would impose costly technological mandates without clear evidence that existing management measures are insufficient. Proposal 165's additional salmon excluder requirements risk duplicating existing bycatch controls that are already among the strictest in the world.



Alaska's fisheries are among the most conservatively managed anywhere. Fishermen like myself take pride in sustainable practices because our livelihoods — and the future of our communities — depend on healthy stocks. However, continual regulatory layering without demonstrated need makes it increasingly difficult for small, community-based fishermen to survive.

I sincerely think that if the State of Alaska, and this Board continue to restrict our small Boat communities... There should be some sort of buy back program, unless they choose to watch us go out of business slowly

I respectfully urge the Board to reject Proposals 11, 163, 164, and 165.

Thank you for your time and consideration.

Sincerely, Taylor Lundgren Sand Point, Alaska

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Michael Macaluso. I am the owner and operator of a salmon seiner for the last sixteen years, and I hold seine permits in both Prince William Sound and Chignik. My vessel is the 53-foot F/V Wave Walker.

I am a salmon fisherman, and this career has sustained my family. I have reinvested in my business over the years. With less income, I would invest less in my operation and have less income to contribute to local businesses.

If these proposals pass, they would significantly affect the livelihoods of myself, my crew, and the local businesses in Homer and Valdez where I do boat work. Less fishing opportunity and fewer fish mean less income. Communities in the Prince William Sound area would see population reductions, as people would move away in search of other jobs. The same has happened in communities such as Chignik, King Salmon, and Perryville. Commercial fishing is the lifeblood that keeps these communities going, from fishermen to the businesses that support them.

Without sound science, these major decisions would have consequences that take years to recover from. If proposals pass and are later overturned, it takes only a short time to cause severe damage and a long time to rebuild.

I have been fishing all over the state for over 25 years. I have seen both highs and lows, and in my opinion, climate and ocean conditions are the biggest factors affecting returns. Massive bird, fish, and whale die-offs are tied to warming water temperatures and broader marine changes. Blaming hatcheries is easier than addressing complex marine conditions that are much harder to change.

Hatcheries support stability throughout the state for commercial fishermen, sport fishermen, personal use harvesters, tourism, and local communities. With climate conditions in the north becoming more erratic, hatcheries help many people sustain a life from our oceans.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not

respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Michael Macaluso

AK  


March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Schuyler Mace, and I am a commercial troller based in Sitka, Alaska. I serve as an NSRAA Board Member, At-Large Troll, and I fish aboard the F/V Marauder. These proposals would reduce fishing opportunity and create the potential for significant loss of income.

A reduction of this magnitude would mean a massive decrease in harvest opportunity for commercial gillnet, seine, and troll fisheries, and it would reduce economic revenue for the entire community of Sitka at multiple magnitudes.

With the reduction of hatchery egg take of chum salmon in Southeast Alaska, it will bleed over into the economic viability of Chinook and coho production at current levels. This will in turn lead to less hatchery contribution to the commercial troll fishery and sport fishery for Chinook and coho.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Schuyler Mace  
Sitka, Alaska



**Submitted by:** Kristen Maddox

**Community of Residence:** Fairbanks

I support any proposals including 163,164 and 165 which limit trawling, bycatch and stop the destruction of our sea floor habitats

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**Submitted by:** Erica Madison

**Community of Residence:** King Salmon

Proposal 163:

Under the National Marine Fisheries Service and the North Pacific Fishery Management Council, midwater trawl gear or pelagic trawl gear is allowed some bottom contact. If regulators reclassify these trawls that touch the bottom anywhere from 20 to 100 percent of the time, they would be subject to the regulations of bottom trawlers. If pelagic nets are going to touch, and specifically drag the bottom, they should be subject to the same closures of bottom-trawls. They should be prohibited in areas where bottom trawling is banned.

National Marine Fisheries Service. Summary of pelagic trawl gear seafloor contact estimates for Bering Sea and Gulf of Alaska pollock fisheries, NOAA Fisheries Report, 2022, estimates pelagic trawls deployed by catcher vessels are on the bottom roughly 40% of the time and pelagic catcher-processors around 85% of the time. Alaska Marine Conservation Council. The Myth of "Mid-Water" in Alaska Pollock Fishery 2023 showed similar results with 40-80% contact of pelagic trawls and the bottom.

This substantial bottom interaction is observed enough to prompt discussion in revisiting the definition of pelagic trawling. By changing the name to what it actually is, bottom trawling, closes the regulatory gaps and gives the clear performance standard. Pelagic trawls can not drag the bottom and bottom trawls must adhere to set regulations.

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**Submitted by:** Erica Madison

**Community of Residence:** King Salmon

Clear monitoring standards need to be put in place for when pelagic trawl gear contacts the seafloor. Nearshore waters harbor critical habitat for juvenile salmon, rockfish, forage fish, and crab. Habitat protection is of the highest priority to ensure the growth and wellbeing of these species down the line and therefore guaranteeing we can keep our fisheries open in the future. Intermittent bottom contact can disturb benthic habitat, and this is exactly what is happening with pelagic trawling, it is dragging the bottom 20-100 percent of the time.

Monitoring will ensure consistency in performance. Pelagic gear needs to be defined by performance in the water column, if it is dragging or touching the bottom, it must be monitored and measured. Standards for monitoring create uniform benchmarks that all trawling can be measured by and therefore fair regulations can be subsequently put in place. This will create fairness across fleets that are under strict gear restrictions and area closures.

In order to enforce any guidelines, enforcement agencies need clear data, this can only come from consistent monitoring. Data driven evidence will aid in determining pelagic trawlers compliance with verifiable records.

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**Submitted by:** Erica Madison

**Community of Residence:** King Salmon

Salmon excluder devices are already widely required in the Bering Sea pollock fishery under the National Marine Fisheries Service and overseen by the North Pacific Fishery Management Council. They have been tested and appear to work as cited in these studies.

Balsiger, J. W., & Hartman, J. (2014). Final Environmental Assessment for Issuing an Exempted Fishing Permit for the Purpose of Testing a Salmon Excluder Device in the Eastern Bering Sea Pollock Fishery. NOAA/NMFS.

Balsiger, J. W., & Hartman, J. (2012). Environmental Assessment for Issuing an Exempted Fishing Permit for the Purpose of Testing a Salmon Excluder Device in the Central Gulf of Alaska Pollock Fishery. NOAA/NMFS.

NOAA Fisheries (2025). Bering Sea Pollock Fishery Exempted Fishing Permit 2025-01 Salmon Excluder Permit. NOAA/NMFS Alaska Region.

Gauvin, J., et al. (2021). Evaluating the role of bycatch reduction device design and fish behavior on Pacific salmon escapement rates from a pelagic trawl. *Fisheries Research*, 236, 105830.

With the public concern rising over declines in salmon and the potential shutdown of our beloved salmon fisheries, salmon bycatch is a "hot" topic that is not going away. Why not make minimizing unintended salmon bycatch the priority? Taking a fresh stance and doing everything possible to conserve a culturally and ecologically fundamental species in Alaska. phasing in the salmon excluder devices would do just this, and they are already required in the Bering Sea pollock fishery under NMFS and overseen by the North Pacific Fishery Management Council.

This is a solution that will help, not fix the problem. Its a start to the solution. It is a proven tool that can be a huge aide in operational stability for the trawler fleet. Why not at least try something that could save a couple salmon from their bycatch demise. It's worth a shot.

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March 2, 2026

Dear Members of the Board of Fisheries:

My name is Michael Mahoney. I am a community member of Cordova, a 25-year commercial fisherman, subsistence user, sport fisherman, and local business owner focused on recreation and tourism. I operate the F/V Dorothy G and Explore Cordova.

Reduced hatchery production could significantly impact my family's access to salmon and would have a major negative impact on my community. Less revenue would be generated and recirculated throughout our coastal economy.

This type of arbitrary and non-scientific management sets a precedent that damages our ability to continue healthy long-term management of state fishery resources.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

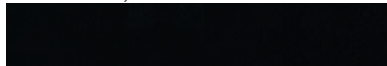
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Michael Mahoney  
Cordova, Alaska



**Submitted by:** Beau Manley

**Community of Residence:** Kenai

As to proposal 175. I have dip nett in cook inlet the past two years and haven't caught one king salmon. Haven't seen any one else dip net in inlet catch one. There is no Commercial dip nets in the kenai river were the kings are bottle up.no reason to reduce web mesh size. This would have a negative effect on what little opportunity we have to catch red salmon.i Oppose proposal 175

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**Submitted by:** Regan Mann

Cdfu, pwsac

**Community of Residence:** Cordova

Dear Members of the Alaska Board of Fish,

My name is Regan Mann, and I am a commercial fisherman in Prince William Sound. I strongly oppose Proposals 170, 171, and 172, which would reduce or freeze pink and chum hatchery production statewide.

As someone who fishes in Prince William Sound, I have seen firsthand how important hatchery production is to the stability of our fisheries and coastal communities. Hatchery salmon are not a fringe part of our industry — they are a core component of the economic engine that keeps working waterfronts alive.

Esther Hatchery supports a substantial share of harvest opportunity in Prince William Sound. Reducing egg take by 25% or freezing future production increase would not be a minor adjustment — it would mean fewer fish in the water, fewer openings, and less opportunity for fishermen to operate sustainably. The impacts would extend beyond fishermen to processors, tender operators, fuel docks, marine service providers, and the broader coastal economy.

These proposals would create financial instability for hatchery operations themselves by cutting cost-recovery opportunities. That threatens the long-term viability of programs that have been operating under Alaska's established management system for decades. Hatcheries are already subject to rigorous oversight and permitting by ADF&G, backed by extensive data and review. Broad, statewide mandates are not a substitute for region-specific science and adaptive management.

For commercial fishermen like me, predictability matters. Our businesses rely on consistent opportunity to make payments on vessels, permits, gear, insurance, and crew wages. Sudden production cuts would ripple through families and coastal communities that are already navigating challenging market conditions and rising costs.

Prince William Sound hatchery production supports not just commercial fisheries, but also sport, personal use, and subsistence users. Reducing hatchery output statewide risks harming all user groups without clear evidence that such broad action is warranted.

If there are regional concerns, those should be addressed with regional data and targeted solutions — not blanket reductions that impact the entire state.

For these reasons, I respectfully urge the Board to reject Proposals 170, 171, and 172.

Thank you for your time and for your service to Alaska's fisheries.

Sincerely,

Regan Mann

Commercial Fisherman, Prince William Sound

Cordova, Alaska

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**Submitted by:** Thomas Manos

**Community of Residence:** Girdwood / King Cove

Finfish

I am addressing parallel fisheries in state waters. Obviously fish don't recognize the 3 mile demarcation line between State and Federal waters. This is far more complicated than appears. Conservation and allocation between user groups are important and I have been involved at both the council and the board of fish level since 1991 when I first began participating in Cod and Pollock fisheries. I strongly recommend the status quo for this meeting. Unfortunately for me as an area M resident our fishermen, and communities have given more blood than will be survivable for some. The sad piece is that it was not a reallocation, it was a misguided punishment by some members on the board that benefited no one.

I have been involved in the board process for 46 years and until now I have felt it has addressed sticky allocation issues fairly and was a necessary piece in making Alaska fisheries one of the best managed in the world. I remind you that resource management and scientific evaluation are critical and it is not expected that the BOF take those tasks on. ADF&G and NMFS has a bunch of very intelligent scientists and managers specifically tasked to address these issues. That the BOF has shown up with what seems to be a self serving agenda and the power to implement it is causing a great deal of damage to the resource, the user groups that rely on it, the Alaskan communities and the State as a whole.

Some board members should be ashamed at the self serving ignorance they bring to this process. Based on recent BOF action I believe the best course of action is for the Board to quit! You have lost your way and fairness and integrity is lost on some of you. You are causing a great deal of harm to fishers, communities and the State of Alaska.

**Submitted by:** Jeffrey Mans

**Community of Residence:** Cordova

CDFU Positions | Hatchery Proposals 170-172 | Statewide Board of Fish | March 2026

1 | Precision Management Matters

CDFU supports science-based hatchery management and thoughtful adaptation, but we oppose blunt, sweeping cuts. Hatchery adaptation requires careful, data-driven adjustments, not across-the-board reductions. In Prince William Sound, hatcheries operate as integrated systems. Chum and pink salmon aren't just commercial fish, they fu research, monitoring, recovery work, sport and subsistence opportunities, infrastructure, and decades of salmon data collection. Cutting production without a clear strategy doesn't just affect those species, it destabilizes the whole system — for all species, and all users.

Hatcheries help managers understand salmon survival and adapt resilience strategies.

Straying trends, for instance, are best addressed with precision tools such as improved imprinting, release timing, and facility-specific adjustments, not speculative egg-take cut

Questions about ocean interactions are addressed through targeted research, including food-web and plankton studies, juvenile survival tracking, cohort comparisons, and

coordinated North Pacific work. There's no clear evidence that cutting Alaska hatchery production would change current ocean dynamics. It is clear that drastic cuts would weaken Alaska's capacity for research and precision management.

## 2 | Shared Benefits, Regional Stewardship

Hatchery programs provide critical access for sport, subsistence, and personal use harvests while sustaining commercial fisheries that keep coastal communities working. The benefits come from decades of regional investment. In Prince William Sound, hatcheries have stabilized sockeye access for subsistence users and strengthened fishing opportunities for rural communities. Similar programs across the Gulf of Alaska provide reliable sport and subsistence access that wouldn't otherwise exist.

Hatcheries are also key tools for recovery, especially for Chinook, which are particularly climate-sensitive. As changing ocean and river conditions challenge Chinook populations, hatcheries support rebuilding through monitoring, supplementation, and research. Eroding that infrastructure undermines our ability to recover vulnerable stocks, as well as the lasting partnerships between hatcheries and local communities, including Alaska Native organizations. Hatcheries are inherently regional, shaped by local watersheds and priorities.

When communities guide local enhancement and management, outcomes are stronger.

Effective management requires strong science and regional leadership. Proposals 170, 171, and 172 weaken partnerships and recovery tools without offering workable alternatives.

See attached

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brad Marden, and I am a commercial salmon fisherman seining for salmon in Kodiak waters. In the offseason, I live in Homer, Alaska, and I do all my boat work in either Homer or Kodiak. My fishing vessel is the F/V Renaissance, which has been fishing salmon in Kodiak since it was built in 1990.

An important fraction of the overall salmon harvest for Kodiak seiners comes from hatchery production. Reduced hatchery production would directly reduce my family's income from fishing. Even for my operation, where I often attempt to target non-hatchery fish stocks, the fishing fleet dynamics from reduced opportunities near the Kodiak hatchery would impact me negatively through more crowding in fishing areas targeting wild stocks. Fleet consolidation is a major concern for me and can make or break my ability to make a livable wage for my family.

The communities of Kodiak and Homer would certainly see negative financial effects from reduced hatchery production. Alaskan fishermen take pride in fish taxes going to our communities, and we take pride in spreading income generated from fishing to other local businesses and marine trades. On lean fishing seasons, and with harmful fishing policies, there is much less money spread within our communities.

I understand concerns about struggling fish stocks and the possibility of nutrient limitation and cross-species food competition. However, blaming hatchery production, mainly pinks, for statewide run failures of king salmon is unfair scapegoating and is not supported by adequate research. I want long-term success for all salmon species, but reducing hatchery production would cause immediate and certain harm to fishermen and coastal communities without confidence that it would achieve the desired outcomes. The guaranteed downsides of these proposals, especially Proposal 170, far outweigh speculative upsides.

The regional planning team process that is currently established and mandated is an important process and should not be abandoned in favor of an inflexible and arbitrary cap on hatchery production. The process is imperfect, but it allows for flexibility and adaptive management, which are critical bedrocks of Alaska's fisheries management success. Hatchery production helps smooth out the unpredictability of wild runs and helps spread out a fishing fleet. In many ways, hatchery production can take pressure off wild runs so that struggling runs have the chance to recover.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Brad Marden  
Homer, Alaska



**Submitted by:** Fred Marinkovich  
**Community of Residence:** Washington

Board,

My name is Fred Marinkovich, I have been fishing in Prince William Sound for over 20 years. I am a Boat owner and an Area E permit holder.

I strongly oppose Proposals 170,171, and 172.

Hatchery production supports sport, personal use, subsistence, and commercial fishing statewide.

thank you for your time.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Bud Marrese, and I am a commercial fisherman in Southeast Alaska. I operate Buds Fisheries LLC.

These proposals would be detrimental to my income stability, business viability, and my family livelihood. The impacts would extend beyond me as well. Reduced hatchery production would reduce harvest opportunity and create ripple effects across supporting businesses and the broader coastal economy.

I am also concerned about further biased decision-making and a lack of integrity in the Board process, with Alaska fisheries management succumbing to “sounds good” hearsay. Why would we overlook proven successful hatchery operations, management, and benefits to all in varying degrees for decades? The benefits far outweigh hearsay ideas about what “should be.”

Of course, other factors are far more relevant and consequential to outcomes, and these systems are cyclical. Hatcheries have an overall track record that is impeccable when looking at how they have adapted and operated.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Bud Marrese  
SE Alaska, Alaska





**Submitted by:** Charles Martin

**Community of Residence:** Kodiak

Thank you madam chair and board members. My name is Charles Martin boat owner and captain of the fishing vessel Donna Rae and I do participate in the Kodiak Island jig fishery. I am informing you that I am in support of proposals 166,167 and 169 I believe these proposals will benefit all Kodiak Island jig fisherman in attempts to regulate the fisheries from illegal fishing. It is my belief that these proposals will help limit the confusion and give a better understanding of gear types that are legal and illegal to be used in The jig fisheries and may reduce the illegal harvesting of our fishery. I appreciate your understanding and consideration of these proposals. I believe these proposals will make a great impact for our future. thank you very much Charles Martin fishing vessel Donna Rae.

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**Submitted by:** David Martin

**Community of Residence:** Clam Gulch, Alaska

I am strongly opposed to the Statewide Proposals 170,171 and 172. I once again have to oppose these unscientific proposals by anti-hatchery authors that are arbitrary and capricious and will be catastrophic to the Aquaculture organizations and fisheries if passed. If any of these proposals should pass, in all likelihood, it would put some Aquaculture organizations out of business, forgo stocking programs that benefit commercial, sports and subsistence fisheries and related industries. For example most all of the sockeye and coho salmon caught in the sport fishery in Resurrection Bay and the sockeye and pink sport and dip net fishery in Kachemak Bay are produced by Cook Inlet Aquaculture association. These programs would no longer be financially able to continue. The egg take permitted levels have remained consistent for years and they were scientifically, biologically and genetically developed by the State Department of Fish and Game and the Aquaculture Associations on a hatchery by hatchery bases on what is suitable to that hatchery and the local ecosystem. These proposals only quote unverified theories, that are not verified by the best reliable science. This Board has wisely rejected these types of proposals several times already and I request that they do so again. There is no new reliable science or reliable conservation concerns to approve these proposals. Thanks you,

David Martin

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nick Martin, and I am a commercial fisherman based in Ketchikan, Alaska. I am a Southeast gillnetter operating out of Keta Bay.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would absolutely destroy my income stability, job security, and family livelihood.

They would also harm many local businesses. Fishermen would not have the money to put back into the community. If hatchery production is reduced, it would drastically impact my business and my family's livelihood. I would most likely have to find a new job.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Nick Martin  
Ketchikan, AK

PC297

**Submitted by:** Dorofey Martushev

**Community of Residence:** Homer

It is out of cycle. It was opposed by the department and most of the public input was against it. There is no map of what area is inted to be closed. There is no biological reason for this. There's no data for this. There's 1200 streams in the cook inlet and they're only looking at 2 streams in the valley as they're indicators. That didnt meet their silver count. Not acceptable.

---

PC298

**Submitted by:** Ilia Martushev

**Community of Residence:** Homer Alaska

oppose 186, it's out of cycle, there is no biological reason and evidence for this proposal and there is no data , there are over 1,200 river streams in the upper Cook Inlet and the 2 river systems that are used in the argument are the ones that are HEAVILY FISHED in the Valley!

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PC299

**Submitted by:** Nikit Martushev

**Community of Residence:** Homer

I strongly oppose proposal 186 I have fished coon inlet all my life we do not catch very many silvers to be dismissing their stock that much. We are already heavily regulated barely get any openings.

---

PC299

**Submitted by:** Nikit Martushev

**Community of Residence:** Homer

As a Upper Cook Inlet drift gillnet fisherman, I strongly oppose Proposal 186. It guts our ability to harvest surplus Kenai sockeye by locking extra fishing time into cramped near-shore zones (Expanded Kenai, Expanded Kasilof, Anchor Point) and banning or slashing openings in broader areas like Drift Gillnet Area 1—right when strong runs (>2.3M, especially >4.6M) demand full fleet access.

This proposal is a terrible move:

Wastes abundant sockeye. Surplus fish get lost upstream instead of harvested efficiently in open water, slashing total catch, processor revenue, and community income from a proven sustainable resource.

Ignores adaptive, science-based rules. The current plan already ties openings to run strength, escapement data, and inseason management—working well for multi-user balance. Proposal 186 overrides it with unproven cuts that erode fleet viability without solid evidence linking state drifters to coho failures.

Hits livelihoods hard. This seasonal income supports families, crews, and shore businesses. Cutting prime July 16–31 time pushes more permits out of the water and threatens coastal economies.

Reject Proposal 186. Protect fair harvest of surplus sockeye, keep the fleet afloat, and demand real fixes—like better coho data and federal EEZ coordination—not knee-jerk restrictions on state commercial fishermen.

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# MATANUSKA-SUSITNA BOROUGH

## Planning and Land Use Department

### Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

[www.matsugov.us](http://www.matsugov.us)

To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: February 26, 2026

Re: Comments on 2026 Statewide Finfish and Supplemental Issues

## I. Preamble

The following comments are submitted on behalf of the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC). The MSB FWC represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area the size of West Virginia. Within this area, residents fish commercially, personal use dip net, sport fish, and four indigenous communities — Chickaloon, Knik, Eklutna Village, and Tyonek – engage in subsistence, educational, and personal use fisheries. The members of the FWC bring decades of experience managing fish and wildlife resources within Alaska.

Positions and actions of the MSB FWC related to fisheries conservation and management are informed by six (6) clearly stated goals:

1. Long-term salmon conservation and protection of salmon habitat.
2. Maintain and enhance the Conservation Corridor in the drift gillnet fishery management plan.
3. Clarify or strengthen conservative management practices which provide protection for current and formerly identified Stocks of Concern.
4. Increase inriver returns of coho and sockeye salmon to Northern Cook Inlet systems.
5. Adjust existing king salmon management plan and strategies to more adequately address conservation concerns for king salmon returning to Northern Cook Inlet drainages.
6. Maintain or extend Personal Use fishing opportunity for Alaskan residents fishing Northern Cook Inlet drainages.

### MSB Fish and Wildlife Commission Proposal Positions

For the 2026 Statewide meeting of the Alaska Board of Fisheries, the FWC is focused solely on reviewing and developing a position for proposal 186, which was accepted as an Agenda Change Request (ACR) consistent with guidelines set forth in 5 AAC 39.999, to address a “fishery conservation purpose or reason”. The FWC is pleased that the Board, through its actions in accepting the ACR, recognizes the magnitude and urgency of the issues that Proposal 186 seeks to address.

## II. Matanuska-Susitna Borough Fish and Wildlife Commission Comments on Statewide Finfish and Supplemental Proposals

### Proposal 186 5 AAC 21.353

#### Central District Drift Gillnet Fishery Management Plan.

**SUPPORT**

What problem does Proposal 186 address?

With the inception of the more liberal Federally managed EEZ drift gillnet fishery, and Kenai king salmon conservation changes, the State of Alaska seeks to harvest a greater portion of surplus Kasilof and Kenai River sockeye salmon offshore in the drift gillnet fishery. This strategy is inconsistent with terminal stock fisheries management and has resulted in increasing incidental catches of Northern bound coho salmon, negatively affecting spawning escapements, and reasonable harvest opportunities for subsistence, commercial, sport, and personal use needs in Northern Cook Inlet.

Inriver salmon shortages have resulted in consistent restrictions and closures for Northern District commercial and sport fisheries over the past three years. Sport fishery closures were focused most specifically on the Deshka River and Little Susitna River during this time. In spite of intense inriver restrictions, too few salmon were left to even remotely achieve published Department coho salmon SEGs in either river. Adaptive Management Changes need to be considered and made. A more precautionary management approach as outlined in 5 AAC 39.222 is clearly required.

What does Proposal 186 do?

Proposal 186 seeks to limit incidental catches of coho salmon by effectively reducing the fishing area starting July 9 by limiting commercial fishing to the Expanded Kenai section (Statistical Area 244-52) and Expanded Kasilof Section (Statistical Area 244-62) and Anchor Point Section (Statistical Area 244-63) with removal of additional fishing time outside these sections regardless of sockeye run strength.

Specifically, Proposal 186 does the following:

- 1) from July 9 – July 15 at run strengths greater than 2.3 million Kenai River sockeye, Drift Gillnet Area 1 is removed from the current regulation
- 2) from July 16 – July 31 at run strengths of greater than 2.3 million Kenai sockeye
  - a. removes reference to one regular 12 hr. period
  - b. removes Drift Gillnet Area 1
- 3) Removes reference to remaining weekly 12-hour regular fishing periods that took place in the Expanded Kenai, Kasilof and Anchor Point Sections.
- 4) At run sizes projected to be over 4.6 million, it restricts the district-wide period to the harvest corridor.

## Discussion and Rationale

The history of commercial fisheries management priorities in Upper Cook Inlet has been one of placing the harvest of surplus sockeye salmon, particularly those stocks bound for Kenai and Kasilof Rivers, ahead of conservation concerns for weaker Northern bound coho and chinook salmon stocks. Additionally, Upper Cook Inlet has historically been managed as a mixed stock commercial fishery which further impacts the weaker Northern bound stocks.

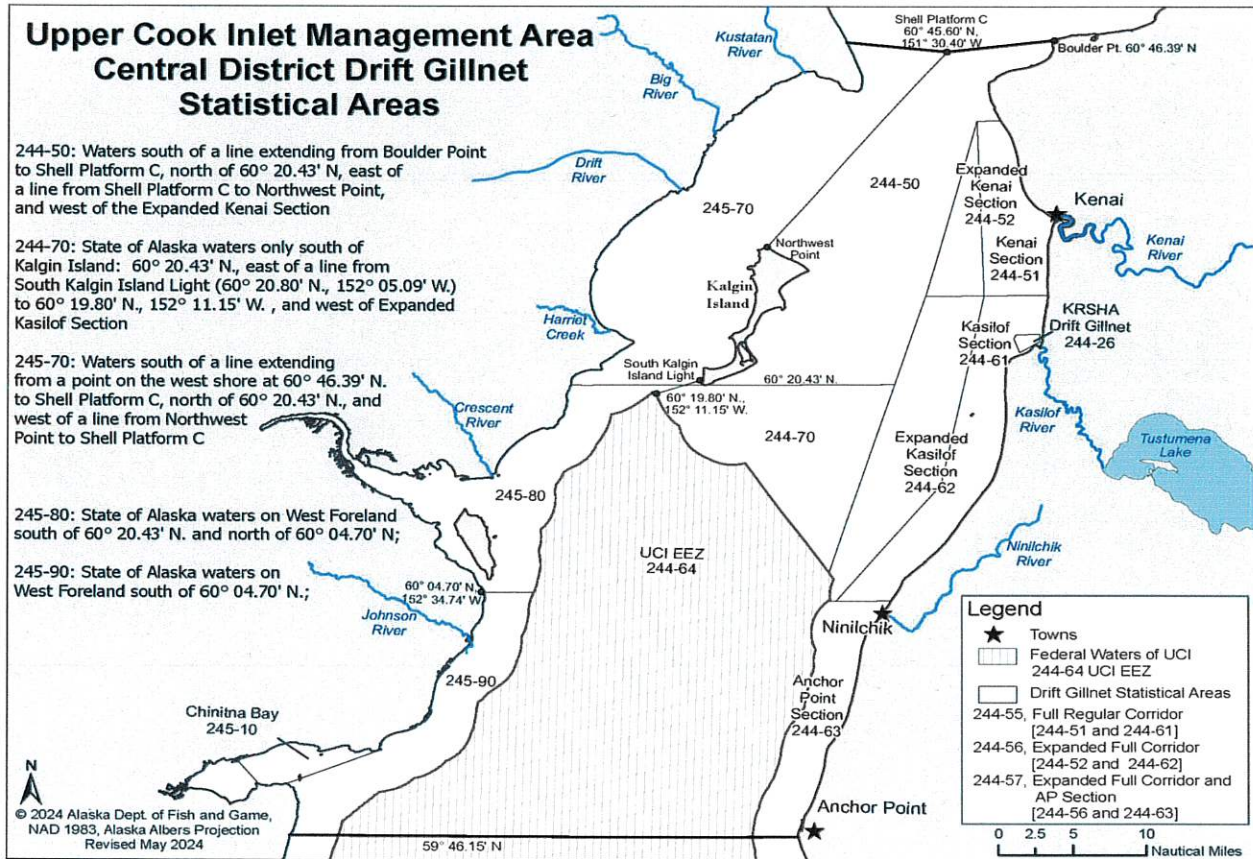
In more recent Board of Fisheries actions, the board has moved incrementally toward regulations favoring Terminal Stock Fisheries management as is employed in Bristol Bay. This was first evidenced in the Board's recognition of the value of a "Conservation Corridor" to pass Northern bound stocks by limiting more commercial drift gillnet fishing to what is now referred to as the Expanded Kenai, Expanded Kasilof and Expanded Anchor Point sections. This enlightened approach had the potential to favorably address stock conservation issues in the Northern District and allow the harvest of surplus sockeye until the creation of the Federally managed EEZ.

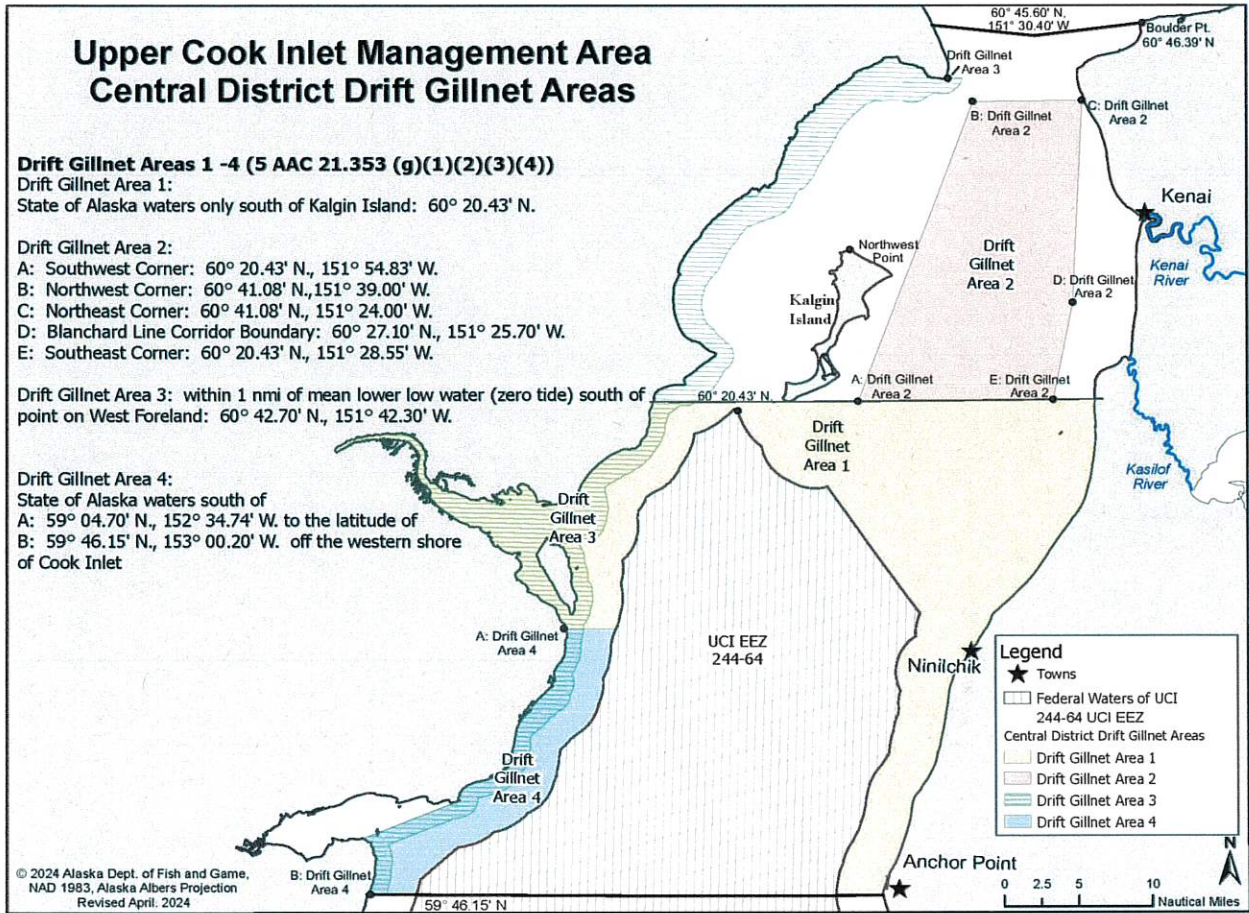
The creation and management of the EEZ creates an incredible amount of uncertainty for the Alaska Department of Fish and Game and the Board of Fisheries. In the face of uncertainty, the Board routinely has applied a precautionary principle to managing salmon harvest in favor of meeting escapement and inriver targets. Proposal 186 calls for restrictions in the drift gillnet fishery to address the consistent failure of the current management system to meet escapement and inriver use needs of the Northern district, while still providing sufficient tools for the Department to effectively manage the important commercial fishery.

The Matanuska Susitna Borough Fish and Wildlife Commission strongly supports Proposal 186 and looks forward to working with the Board of Fisheries and other stakeholders to address the serious and chronic conservation concerns recognized by the Board in accepting Proposal 186 as an Agenda Change Request.



MSB Fish & Wildlife Commission Chair, Pete Probasco









**THE STATE OF ALASKA**  
**MIKE DUNLEAVY**  
**GOVERNOR**

**Boards and Commissions**

Office of the Governor

550 W 7<sup>th</sup> Ave. Suite 1700  
 Anchorage, Alaska 99501  
 907-269-0006

**Open Meetings Act**

The State of Alaska's Open Meetings Act (AS 44.62.310-.312) requires that all meetings of a public entity's governing body be open to the public and that the body provide reasonable notice of its meetings. The Open Meetings Act (OMA) is intended to ensure that decisions made and actions taken are public knowledge and represent the will of the public that the governing body serves. In essence, the OMA protects the public's right to know.

To be able to protect the public's right to know, the OMA requires that:

- all deliberations and action taken by a public entity must be done in public view, with limited exceptions;
- the public must be provided prior knowledge of all steps occurring in the decision-making process, with limited exceptions; and that
- individual actions of an official are made known.

In order for these requirements to have full effect, meetings must occur as provided in the notice; and, with few exceptions, the public must be allowed to involve itself in the meeting. The public must also have access to materials being considered during the meeting.

In addition to laying out specific steps required for meetings and allowable exceptions, the statutes addressing open meetings speak about the state's policy regarding what authority the public has delegated to governing bodies. Following is a synopsis.

According to the 'State Policy Regarding Meetings' (AS 44.62.312):

- The government exists to aid in conducting the people's business.
- Government units should act and deliberate openly.
- The people do not yield sovereignty to government agencies that serve them.
- Public servants have not been given the right to decide what is good or not good for the people to know.
- People should remain informed so they may retain control over the government they created.
- The use of teleconferences is for the convenience of the parties, public, and government.
- The Open Meetings Act should be narrowly construed to effectuate these policies and avoid unnecessary exemptions.

**What is the Open Meetings Act?**

The State of Alaska's Open Meetings Act (AS 44.62.310-.312), is a law that addresses the meetings of public entities; it protects the public's right to know and their opportunity to be heard. Among other things, the Act:

- defines public meetings and public entities;
- lays out specific requirements for public notice;
- requires that all meetings of a governmental body of a public entity are open to the public;
- lays out provisions for attendance at meetings and voting methods;
- lays out provisions for distribution of meeting materials; and
- lists the few exceptions to the Act, as well as matters that may be discussed in executive session.

In order to assure that the public information/participation provisions of the Act are met, the Act requires that the public entity must provide "reasonable" notice that meets the requirements of the Act. To meet these notice requirements, the notice must:

- be provided within a reasonable amount of time prior to the meeting;
- include the date, time, and place of the meeting;
- be posted at the principal office of the public entity, in addition to any other methods and locations stated in local ordinance; and
- be done in the same way each time (consistent).

**What is the definition of a meeting that would fall under the provisions of the Open Meetings Act?**

AS 44.62.310(h) provides detailed definitions of "governmental body," "meeting," and "public entity" that, when combined, define what constitutes a public meeting. The Act makes a distinction between what constitutes a meeting of a policy/decision-making body and what constitutes a meeting of an advisory-only body.

A meeting of a decision- or policy-making body occurs when more than three members, or a majority of the members, whichever is less, engage collectively in discussion of a *subject that the body is authorized to act and set policy on* and is therefore subject to the Open Meetings Act. Under this definition, it doesn't matter where the meeting occurs, if it was prearranged, or who arranged it and could include unplanned casual or social contact.

A meeting of an advisory-only body is a prearranged gathering to consider a matter on which the entity is *authorized to advise and assist the decision-making body* and is subject to the provisions of the Act. The Act doesn't specify a number, so two or more members, if the gathering is prearranged for the purpose of conducting any business of the entity, could constitute a meeting.

**What types of meetings might be conducted that would require notice under the Open Meetings Act?**

Following are the most common types of meetings that would be subject to the Open Meetings Act:

**Regular Meetings:** State law requires that the governing body conduct its business at regularly scheduled meetings that are open to the public. Regular meetings must be held at least once a month and may be held more often, as required or established in local ordinance. The local code of ordinances should provide the date, time, and place of regular meetings so that everyone knows when regular meetings will take place. The public shouldn't have to wonder about the meeting time, date, and place always changing. If at times it is necessary to reschedule the regular meeting, notice must be posted informing the public that the regular meeting has been rescheduled and when it will be held.

**Special Meetings:** Special meetings have the same requirements as regular meetings, except that they are called for a different time than that fixed for regular meetings. For example, local ordinance may require that the governing body hold its regular meeting on the third Tuesday of each month at 7:00 PM at the municipal offices. If the governing body must meet earlier, it can call a special meeting for a different date. The special meeting does not take place instead of the regular meeting, it is in addition to the regular meeting. Special meetings should be held rarely and only to address time sensitive issues. A special meeting may be held with less than 24-hour's notice if all members are present or if absent members have waived in writing the required notice. Waiver of notice can be made before or after the special meeting is held.

**Emergency Meetings:** Emergency meetings are held to address situations that are so urgent that the governing body must meet right away. An emergency meeting may be held if a majority of the members are given at least 24 hours oral or written notice and reasonable efforts are made to notify all members.

**Committee Meetings:** Permanent ("standing") committees and temporary ("ad hoc") committees of the governing body may be formed to study particular issues in more detail. Standing committees may include the finance committee, public works committee, and/or a facilities committee. Ad hoc committees are formed to address a specific situation and are disbanded once the situation has been dealt with. Committees may be composed of all members of the governing body (referred to as a committee of the whole), or of fewer members, usually three. A committee cannot take action on behalf of the full governing body but instead makes a recommendation to the governing body for the governing body's action. Usually the committee of the whole meets to discuss items that are not ready for action but need further discussion in an informal setting. For example, the annual budget usually requires a work session before it is formally adopted.

**Board of Equalization:** The governing body, or its appointees, sits as the Board of Equalization in municipalities that levy a property tax. AS 29.45.200(a) states, "the governing body sits as a board of equalization for the purpose of hearing an appeal from a determination of the assessor." A property owner who believes the assessor has made a mistake in the yearly valuation of their property may appeal the assessor's decision to the board of adjustment, which meets once a year.

**How much notice is required to meet the "reasonable" public notice provision of the Open Meetings Act?**

How much notice is required depends on the complexity of the issue and the potential effect it will have. Proper public notice must be provided in advance of the proposed action and local ordinances should state the minimum number of days that notice is required. This number should be adjusted up if the situation warrants additional notice. Special and emergency meetings require only 24-hour notice or less. If less notice is given, absent members must waive the notice requirement. Notice requirements for work sessions and committee meetings should follow the same guidelines as those established in local ordinance for regular meetings.

There are minimum mandatory notice requirements for certain actions, such as notice of a public hearing on a proposed ordinance, or election notice. There is, however, no specific number of days spelled out in statute that defines "reasonable." The general tone of case law on the subject has essentially found that reasonable notice provides enough notice that a concerned party will have notice of a proposed action within enough time to be involved in the deliberations. This could vary anywhere from three months to three days. The notice also has to provide enough information to let the public know what subjects will be covered in the meeting. If a complete agenda isn't available at the time of posting, a summary will work until the complete agenda is available.

Local ordinances should contain all of the requirements for public notice of meetings including what to include in the notice, where the notices are posted, and how soon before the meeting the notices are posted.

**Where and how does notice have to occur?**

State law, AS 44.62.310(e), requires that reasonable notice include the date, time, and place of the meeting; and, if by teleconference, the location of any teleconferencing facilities. It also provides that notice may be given in print or broadcast media; that it be posted at the principal office of the public entity or, if no principle office, at a location designated by the governing body; and that it be done in the same way each time "consistent."

In addition to the locations required in statute, notice should be posted at well-used locations in the community like the post office, the store, government offices, and the community bulletin board. It may also be published in a newspaper of general circulation in the community or broadcast over a local radio station in addition to any other means and locations stated in local ordinance.

**Are there exceptions to the Open Meetings Act and what subjects may be discussed in executive session?**

Exceptions to the OMA are discussed in the Executive Session section of LOGON.

**Is secret ballot voting allowed under the act?**

Almost always, no. In addition to requiring that deliberations of a governing body be open to the public, the act also requires that the vote shall be conducted in such a manner that the public may know the vote of each person entitled to vote, including meetings conducted by teleconference. The one exception is organizational meetings of a governing body to elect members to various offices, which are exempted from the requirement that the vote of each member be made public (AS 44.62. 310(a)).

**Is telephone polling considered a violation of the Open Meetings Act?**

Whether a phone poll by a member or agent of the governing body would be considered a violation of the act, depends on the subject matter. If the matter involves an administrative or procedural issue that would not warrant public discussion, a phone poll may be conducted. If, however, the phone poll touches on an issue that should be discussed in an open meeting or can have the effect of swaying opinion on a public issue, it could be considered a violation of the act.

**Who enforces the Open Meetings Act?**

It is the responsibility of the administration and governing body to assure that the provisions of the Open Meetings Act are enforced. Any individual may contest an action administratively through local channels that they think was done in violation of the Open Meetings Act and ultimately may, within 180 days, file a court action if the issue isn't remedied locally AS 44.62.310(f).

There are several court cases that have ruled in favor of the Open Meetings Act. When deciding these cases, the court doesn't just consider whether a violation has occurred, but also considers whether the action has interfered with the public process that the act was intended to protect.

**What is the cure for a violation of the Open Meetings Act?**

Actions taken at meetings that are found to be in violation of the Open Meetings Act may be voided. Failing to provide proper notice can cost a great deal of money to defend in addition to the wasted time and effort involved. The governing body can attempt an informal cure by holding another meeting in compliance with the Open Meetings Act and conducting a substantial and public reconsideration of the matters.

If a lawsuit is filed, the court may void any action taken by the governing body if the court finds that, considering all of the circumstances, the public interest in compliance with the law outweighs the harm that would be caused by voiding the action AS 44.62.310(f)).

In deciding whether to void an action, the court must consider:

- (1) the expense that may be incurred if the action is voided;
- (2) the disruption that may be caused if the action is voided;
- (3) the possibility of additional litigation if the action is voided;
- (4) the extent to which the subject has previously been considered in compliance with the act;
- (5) the amount of time that has passed since the action was taken;
- (6) the degree to which the action has come to be relied on;
- (7) whether and to what extent the governmental body has, before or after the lawsuit was filed, engaged in or attempted to engage in public reconsideration of the matter;
- (8) the degree to which the violations were willful, flagrant, or obvious;
- (9) the degree to which the governing body failed to adhere to the policy under AS 44.62.312 (a).

This does not apply to an advisory only body that that has no authority to establish policies and make decisions for the public entity (AS 44.62.310(g)).

**What effect does attorney client privilege have in dealings between a public entity and its attorney?**

Executive session procedure requires that the reason for calling the executive session is clearly stated. The attorney-client privilege exemption to the Open Meetings Act is limited to matters where public interest may be injured. This might include how to avoid legal liability, litigation strategies and candid discussion of facts, a proposed settlement conference, and a conference on a decision to appeal.

**In addition to the rights protected under the Open Meetings Act, what rights can the public expect under state law?**

In addition to the rights protected under the Open Meetings Act, Title 29 reiterates the requirement that all meetings be open to the public and provides that the public will have the right to be heard at regular and special meetings AS 29.20.020.

AS 29.20.160 lays out the procedures that a governing body must follow in conducting its meetings. These procedures include:

- Provision for identification of the presiding and deputy-presiding officers;
- The requirement that the governing body hold at least one regular monthly meeting, unless otherwise provided by ordinance;
- The requirement that the governing body shall provide at least 24-hour notice for special meetings or absent members must waive the notice requirement;
- Clarification on how actions of the governing body are adopted and what constitutes a quorum;
- The requirement that all members present shall vote on every question, unless required to abstain; and

The requirement that a governing body maintain a journal of its proceedings that is available to the public.

- AS 29.20.380 assigns certain meeting duties and responsibilities to the municipal clerk. These include:
  - Attendance at public meetings;
  - Keeping the journal;
  - Assuring that notice and other requirements for public meetings are complied with;
  - Assuring that public records are available for public inspection;
  - Managing and maintaining public records; and

- Preparing agendas and agenda packets.
- 

**Who enforces the local rules under which a municipality conducts its meetings?**

Governing bodies must have procedures in place and follow them for their meetings. Some of these procedures are in Title 29 and other statutes. Others are in the local ordinances, which are usually more specific and detailed than Title 29, or in rules of procedure adopted by the governing body.

Essentially, the presiding officer enforces the rules by following them when conducting a meeting and, when there is a question of procedure, the clerk, acting as parliamentary advisor, researches the question and proposes an answer, which the presiding officer then rules on. Members of the public also enforce the rules by questioning whenever something occurs that doesn't seem to follow the rules. The last resort for enforcement is a lawsuit.

**Additional Resources**

[Alaska's Open Meetings Law](#) by Gordon J Tans

[Open Meetings Act](#) AS 44.62.310-.312

**Sec. 44.62.310. Government meetings public.**

(a) All meetings of a governmental body of a public entity of the state are open to the public except as otherwise provided by this section or another provision of law. Attendance and participation at meetings by members of the public or by members of a governmental body may be by teleconferencing. Agency materials that are to be considered at the meeting shall be made available at teleconference locations if practicable. Except when voice votes are authorized, the vote shall be conducted in such a manner that the public may know the vote of each person entitled to vote. The vote at a meeting held by teleconference shall be taken by roll call. This section does not apply to any votes required to be taken to organize a governmental body described in this subsection.

(b) If permitted subjects are to be discussed at a meeting in executive session, the meeting must first be convened as a public meeting and the question of holding an executive session to discuss matters that are listed in (c) of this section shall be determined by a majority vote of the governmental body. The motion to convene in executive session must clearly and with specificity describe the subject of the proposed executive session without defeating the purpose of addressing the subject in private. Subjects may not be considered at the executive session except those mentioned in the motion calling for the executive session unless auxiliary to the main question. Action may not be taken at an executive session, except to give direction to an attorney or labor negotiator regarding the handling of a specific legal matter or pending labor negotiations.

(c) The following subjects may be considered in an executive session:

(1) matters, the immediate knowledge of which would clearly have an adverse effect upon the finances of the public entity;

(2) subjects that tend to prejudice the reputation and character of any person, provided the person may request a public discussion;

(3) matters which by law, municipal charter, or ordinance are required to be confidential;

(4) matters involving consideration of government records that by law are not subject to public disclosure.

(d) This section does not apply to

(1) a governmental body performing a judicial or quasi-judicial function when holding a meeting solely to make a decision in an adjudicatory proceeding;

(2) juries;

(3) parole or pardon boards;

(4) meetings of a hospital medical staff;

(5) meetings of the governmental body or any committee of a hospital when holding a meeting solely to act upon matters of professional qualifications, privileges, or discipline;

(6) staff meetings or other gatherings of the employees of a public entity, including meetings of an employee group established by policy of the Board of Regents of the University of Alaska or held while acting in an advisory capacity to the Board of Regents;

(7) meetings held for the purpose of participating in or attending a gathering of a national, state, or regional organization of which the public entity, governmental body, or member of the governmental body is a member, but only if no action is taken and no business of the governmental body is conducted at the meetings; or

(8) meetings of municipal service area boards established under AS 29.35.450 — 29.35.490 when meeting solely to act on matters that are administrative or managerial in nature.

(e) Reasonable public notice shall be given for all meetings required to be open under this section. The notice must include the date, time, and place of the meeting and if, the meeting is by teleconference, the location of any teleconferencing facilities that will be used. Subject to posting notice of a meeting on the Alaska Online Public Notice

System as required by AS 44.62.175(a), the notice may be given using print or broadcast media. The notice shall be posted at the principal office of the public entity or, if the public entity has no principal office, at a place designated by the governmental body. The governmental body shall provide notice in a consistent fashion for all its meetings.

(f) Action taken contrary to this section is voidable. A lawsuit to void an action taken in violation of this section must be filed in superior court within 180 days after the date of the action. A member of a governmental body may not be named in an action to enforce this section in the member's personal capacity. A governmental body that violates or is alleged to have violated this section may cure the violation or alleged violation by holding another meeting in compliance with notice and other requirements of this section and conducting a substantial and public reconsideration of the matters considered at the original meeting. If the court finds that an action is void, the governmental body may discuss and act on the matter at another meeting held in compliance with this section. A court may hold that an action taken at a meeting held in violation of this section is void only if the court finds that, considering all of the circumstances, the public interest in compliance with this section outweighs the harm that would be caused to the public interest and to the public entity by voiding the action. In making this determination, the court shall consider at least the following:

(1) the expense that may be incurred by the public entity, other governmental bodies, and individuals if the action is voided;

(2) the disruption that may be caused to the affairs of the public entity, other governmental bodies, and individuals if the action is voided;

(3) the degree to which the public entity, other governmental bodies, and individuals may be exposed to additional litigation if the action is voided;

(4) the extent to which the governing body, in meetings held in compliance with this section, has previously considered the subject;

(5) the amount of time that has passed since the action was taken;

(6) the degree to which the public entity, other governmental bodies, or individuals have come to rely on the action;

(7) whether and to what extent the governmental body has, before or after the lawsuit was filed to void the action, engaged in or attempted to engage in the public reconsideration of matters originally considered in violation of this section;

(8) the degree to which violations of this section were wilful, flagrant, or obvious;

(9) the degree to which the governing body failed to adhere to the policy under AS 44.62.312(a).

(g) Subsection (f) of this section does not apply to a governmental body that has only authority to advise or make recommendations to a public entity and has no authority to establish policies or make decisions for the public entity.

(h) In this section,

(1) "governmental body" means an assembly, council, board, commission, committee, or other similar body of a public entity with the authority to establish policies or make decisions for the public entity or with the authority to advise or make recommendations to the public entity; "governmental body" includes the members of a subcommittee or other subordinate unit of a governmental body if the subordinate unit consists of two or more members;

(2) "meeting" means a gathering of members of a governmental body when

(A) more than three members or a majority of the members, whichever is less, are present, a matter upon which the governmental body is empowered to act is considered by the members collectively, and the governmental body has the authority to establish policies or make decisions for a public entity; or

(B) more than three members or a majority of the members, whichever is less, are present, the gathering is prearranged for the purpose of considering a matter upon which the governmental body is empowered to act, and the governmental body has only authority to advise or make recommendations for a public entity but has no authority to

establish policies or make decisions for the public entity;

(3) “public entity” means an entity of the state or of a political subdivision of the state including an agency, a board or commission, the University of Alaska, a public authority or corporation, a municipality, a school district, and other governmental units of the state or a political subdivision of the state; it does not include the court system or the legislative branch of state government.

**Sec. 44.62.312. State policy regarding meetings.**

(a) It is the policy of the state that

(1) the governmental units mentioned in AS 44.62.310(a) exist to aid in the conduct of the people’s business;

(2) it is the intent of the law that actions of those units be taken openly and that their deliberations be conducted openly;

(3) the people of this state do not yield their sovereignty to the agencies that serve them;

(4) the people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know;

(5) the people’s right to remain informed shall be protected so that they may retain control over the instruments they have created;

(6) the use of teleconferencing under this chapter is for the convenience of the parties, the public, and the governmental units conducting the meetings.

(b) AS 44.62.310(c) and (d) shall be construed narrowly in order to effectuate the policy stated in (a) of this section and to avoid exemptions from open meeting requirements and unnecessary executive sessions.



**Submitted by:** Brandon Maxwell

**Community of Residence:** Cordova, AK

My name is Brandon Maxwell. I'm a commercial fisherman of 25 years in Area E. I'm also a subsistence and sport user. Below are my comments on the following proposals.

Proposal 170: I oppose proposal 170.

This would negatively affect me and my family, along with many other lifelong Alaskans who rely on these fish to make a living. These fish not only produce money to the coastal towns, they also give employment opportunities for many out of state people who need jobs. Coastal towns will suffer from this. Commercial fishing has already been tough these last few years and cutting hatchery production will be the nail in the coffin.

Proposal 171: I oppose proposal 171.

This will negatively affect many Alaskans. Between food security and job security, it seems very irresponsible to cut the numbers of salmon being produced that feed so many people and create so many jobs. There is no real science behind straying pink salmon negatively affecting other salmon. Since these hatcheries were started there has been consistently better wild salmon returns. There is a reason that BOF has time and time again rejected these proposals.

Proposal 172: I oppose proposal 172.

This will negatively impact many Alaskan residents along with non residents. These fish provide many jobs, and food security for people all over the world. It seems very irresponsible to do this. There is no science behind this. Hatcheries have saved many coastal towns. There is a reason BOF has continuously shut these proposals down.

Proposal 187: I oppose proposal 187.

There is no conservation issue here. This is an allocative proposal and seems irresponsible for the board to support this proposal in favor of a single user group. The data shows that there has been no problem with sport fisherman catching limits and there is always plenty of escapement in these rivers.

I support Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear,;

I support Proposal 165 – Require salmon excluders for pelagic trawl gear,;

I support Proposal 175 – Dipnet mesh and configuration requirements: ,

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish,

I support Proposal 174 – Seine vessel/skiff engine operation requirements.

Thank you,

Brandon Maxwell

**Submitted by:** Brandon Maxwell

BDM Fisheries

**Community of Residence:** Soldotna, Ak

Trawling needs to stop!

Raymond M May, F/V Resilient  
[REDACTED]

Kodiak, Alaska 99615

3/1/2026

Board of Fisheries  
Statewide salmon hatchery proposals  
RE: OPPOSE proposals 170,171, and 172

Dear Chair Carlson Van Dort and Board of Fish Members:

I was born and raised on Kodiak Island. I'm an Alaska Native fisherman that is enrolled in two tribes (Native Village of Port Lions & Native Village of Afognak), along with being a shareholder of three Native corporations (Lesnoi Inc., Afognak Native Corp., & Koniag Inc.). For 46 years, I have participated in commercial fisheries across Alaska as a deckhand and captain. In 2007 I purchased my first boat, and I've been catching salmon ever since.

I've participated in the Board of Fish process for almost two decades, and I was a board member of the Kodiak Regional Aquaculture Association (KRAA), a local private non-profit hatchery that benefits the commercial fishing industry and seafood processing sector, but also tremendously helps local personal use, sport and subsistence fishermen. The Kodiak Road system is famous for it's ease of access to king salmon, sockeye, and coho that are in part produced by KRAA. These fish are easily accessed by local and visiting personal use, sport, and subsistence fishermen who for the most part don't know they are catching hatchery fish. KRAA also produces subsistence sockeye and coho that are released for the villages of Port Lions and Ouzinkie, and hatchery salmon are also available around Kodiak's other villages, helping fill countless freezers and keeping the Alutiiq people fed on their traditional foods.

I OPPOSE proposals 170,171, and 172. These anti-hatchery proposals are yet another attempt to harm Alaskan commercial fishermen, but have the unintended consequence of hurting local personal use, sport and subsistence fishermen. Statewide reductions in hatchery production will only serve to put more pressure on wild stocks by ALL users, as less salmon will be available. Although Alaska's salmon forecasts are a bit of a guessing game, decreased hatchery output will create even less certainty in estimating salmon returns. Alaska's coastal communities are already seeing declines in residency, and having less salmon available for all users will make that problem worse. Reduced salmon runs means fewer commercial fishermen, less processors, less visiting sport fishermen, less charter businesses, less mom-and-pop support businesses, and less people living in communities year-round. Less hatchery fish hurts all of us, not just commercial fishermen.

Sincerely,

Raymond May  
Owner and operator, F/V Resilient

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Connor McCarthy. I am a commercial fisherman fishing on the F/V Quest. I grew up in Homer, Alaska.

Cutting hatchery production by 25% would negatively affect my ability to provide for my family while keeping up with rising boat maintenance costs. Growing up in Homer, I have seen how bad salmon years don't only affect fishermen—they affect the whole community.

I believe the research supporting these cuts is not sound enough. I worry that choosing opinion over science could have serious consequences in the future.

I don't have all the answers, but I do believe upstream habitat is critical for salmon. I live on the Anchor River, and last May while pack rafting I found a gillnet deployed in the river. I reported it to Fish and Game with pictures and coordinates and was directed to the troopers, but I never heard a follow-up. As Alaska's upstream populations grow, so does the threat to critical salmon habitat. This is one example of where attention and enforcement matter.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

**Submitted by:** Patrick McCormick

**Community of Residence:** Anchorage

Comments on Statewide Proposals.

I am an area E drift gillnet permit holder, kenai river licenced sport fishing guide, lifelong alaskan. I hold a BS in environmental science and have completed the coursework required to earn a master's in fisheries.

Proposal 170.

I encourage the board to reject this proposal.

While it is imperative that pink salmon hatchery production be greatly reduced to protect our fisheries, this proposal is arbitrary and is missing key context and evidence that will occur in the 2026 fishing season.

In 2024 the brood year for the 2026 pink salmon return, brood stock goals went largely unmet in PWS PNP hatcheries between 30-40%, primarily due to sea lion predation of female broodstock. Despite lack of broodstock, in 2026 I believe we will see the total weight of salmon to be similar to other years. We should also see increased reliability of sockeye forecast models, as well as over performance of chinook and coho production due to a decreased number of pink salmon in the north pacific.

Hatchery pink salmon in Prince William Sound are exceedingly small in body size, and are of exceedingly low value. PWSAC and VDA should drastically reduce their production in favor of chum, coho, and sockeye salmon. However doing so will require time to minimize impacts on industry, and for the 2024 experiment to play out.

I think it is prudent for the board to use the hatchery committee to explore options to recommend to PWS and VDA, as well as the strategic planning process to reduce Pink Salmon stocking in the north pacific.

PWSAC pink salmon have not been effectively fished by the fleet for three of the last six years. This has even lead to the fleet losing opportunity to harvest ample wild fish, most notably in 2020 when a formal disaster was declared for the pink season. The 2020 ADF&G management report notes that many streams in 2020 we vastly over escaped.

It is clear that pink salmon production is not a sustainable model for the fleet, or PWSAC, and it is vital that we move away from pink salmon production, especially if sustainable fishing for wild stocks are curtailed, in favor of allowing cost recovery and broodstocks for hatcheries.

Unfortunately this proposal does not address this issue in a scientific or economic based way and should be rejected.

Proposal 171

I urge the board, to set a timeline for the strategic planning team to develop an updated comprehensive plan. The comprehensive plan has not been updated in 30 years, and needs to be updated based on the science and economic realities of the past 30 years. I urge the board to make clear that they will consider unilaterally updating the plan, or some other "stick" type approach during the regular PWS fin fish cycle if the plan rewrite is not complete.

I urge the KRSA and other interested parties to follow the comprehensive planning process.

I will echo the comments I made on proposal 170, we must reject pink salmon hatchery production in favor of more valuable fish, with less ecological risk, however this needs to happen with regard to economics and scale. I urge the board to make that clear to all stakeholders.

Proposal 172

I support this proposal, except removing chum salmon from the moratorium. Hatchery chum salmon have been shown to be exceptionally less risky than pink salmon ecologically. Furthermore, if we are going to reduce pink

salmon stocking in the future, the obvious alternative is chum salmon, as they are similar in cost for hatcheries to produce, while yielding much higher values for fishermen.

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**PC306**

**Submitted by:** Erica McDaniel

**Community of Residence:** Wasilla

I am in opposition of proposal #162-This proposal would prohibit commercial transport services in state subsistence fisheries. Many subsistence fishery participants lack the means to access the fishery, this is especially true in the Glennallen Subdistrict on the Copper River where most of the shoreline is privately owned (majority Ahtna native corp. owned) thus making it impossible to legally access the river on foot. A boat is a must and many state subsistence fishery users are more than willing to pay for transportation to a fishing site. This proposal if passed would severely hamper opportunity in state subsistence fisheries.

Also in opposition of proposal #175-This proposal seeks to reduce dipnet mesh size to 3.5” stretch mesh and also prohibit a rope attachment between the dipnet handle and tied to a boat, supposedly to reduce incidental mortality in catch and release of Chinook salmon. No scientific studies or data are presented by the author to justify this claim. If passed, this proposal would for dipnetters statewide, if their net mesh was over 3.5” stretch, require the purchase new netting costing upwards of \$50 for each owned net. This would be a high cost to dipnetters due to a perceived issue.

As far as a rope tied to the dipnet handle and a boat to extend the reach of the dipnet beyond the length of the rigid handle, I am not sure where the author is going with this. The author makes it sound like some boaters are trolling for salmon with dipnets, which is totally absurd. Zero biological concern, and would pose a much greater safety risk for dip netters in boats.

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**PC307**

**Submitted by:** Lloyd Mcdaniels

**Community of Residence:** WASILLA

I supported proposals (186, 11, 163, 164, 165,170, 171, 172). My reasoning is the importance of healing our eco system and preserving the ability to continue to fish for generations to come. Drastic Changes need to be made for our sustainability and Alaskan way of life. The decline of the fishery is sickening. The amount of fish that use to swim through our waters 20 years ago compared to now is a huge shift in numbers.

---

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brian McWethy, and I am a commercial fisherman based in Kodiak, Alaska. Between 80 and 100 percent of my income comes from seining salmon. I fish aboard the F/V All In.

Proposal 170 could significantly impact Kodiak's salmon fishermen. Reducing egg take and returning salmon to Kodiak's hatchery would lead to less fishing time at the hatchery and push vessels into other areas, increasing pressure elsewhere. It would decrease the available fish we can commercially harvest by more than 25 percent, as a set number of returning salmon are retained for brood stock. I spend a significant portion of June, and often much of August and September, fishing around the hatchery.

Restricting egg take without scientific evidence that hatchery fry negatively affect natural stocks is difficult to understand. Hatchery stocks provide a huge and much-needed financial boost to the local Kodiak fishing community. Fishing at the hatchery is close to town and provides a consistent opportunity for smaller vessels and family operations to make a living.

If fishing time is reduced due to fewer salmon at the hatchery, it will significantly affect the entire fleet, including tenders, processors, fuel docks, and local businesses. There are several days, and sometimes weeks, during the summer when the hatchery is the only area open to fishing. When the fleet ties up, Kodiak goes backward financially.

In recent years, Kodiak fishermen have lost substantial opportunity, including closures in the Ugak Section and reduced time in Ayakulik and Karluk due to king salmon concerns. I seriously worry about my future in this fishery.

Salmon fishing in Alaska has long been a well-regulated and closely studied fishery, and hatcheries that have existed for decades have not negatively affected natural runs. I strongly believe declines in king and chum salmon are driven by other factors, particularly ocean conditions and climate change. Hatcheries provide a safety net in an unpredictable environment and allow fishermen to make a living when natural runs fall short.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed


continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Brian McWethy  
Kodiak, Alaska



March 2, 2026

Dear Members of the Board of Fisheries:

My name is Charles McWethy. I am owner and operator of the F/V Shining Sea and have run a salmon seiner in Kodiak for 40 years. I have been a Kodiak salmon seine permit holder since 1985 and have harvested fish from Kitoi Hatchery every year since.

If these proposals were adopted, they would limit my fishing opportunities and decrease salmon harvest in our community. Canneries, crew members, and local businesses would all be affected. Many people in Kodiak depend on summer fishing income for economic stability.

I am concerned about permanent or long-term hatchery reductions without updated, research-based, regional comprehensive Salmon Enhancement Plans. Hatcheries provide stability, predictability, and sustainability in Alaska fisheries.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Charles McWethy  
Kodiak, Alaska





**Submitted by:** Ed Meadows

**Community of Residence:** USA

no sea floor trawling

there is enough fishing territory in US that allows this method

protect future fish and fishing jobs

prohibit sea floor trawling

thank you

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Madame Chair and Members of the Board,

My name is Tom Meiners and I am a purse seiner in Southeast Alaska. I was born and raised in Juneau, and started my fishing career gillnetting with my father in Taku Inlet, and graduated to seining a few years later. I have participated in the Southeast seine fishery since 2006, run a boat in the fishery since 2014, and served as president of the Southeast Alaska Seiners Association (SEAS) since 2023. Additionally, I have served on the board of directors of many of the hatchery organizations in Southeast Alaska; the Northern Southeast Regional Aquaculture Association (NSRAA) board, the Southern Southeast Regional Aquaculture Association (SSRAA) board and have filled in on the Southeast Joint Regional Planning Teams. I currently sit on the DIPAC hatchery board of directors and as an alternate on the Northern Panel of the Pacific Salmon Commission, representing Alaskan interests when negotiating the Pacific Salmon Treaty. Through both fishing and serving on these various boards and groups, I have become very familiar with Southeast Alaska hatchery process and management, which leads me to strongly oppose proposals 170 and 172.

Proposal 170 seeks to cut hatchery production statewide by 25%. One year ago, the board of fisheries voted down a nearly identical proposal aimed specifically at Southeast Alaska. Being most familiar with Southeast Alaska, I think it prudent only for me to make the case about the ramifications and impacts this proposal would have in Southeast, and Southeast hatchery productions potential impacts other places.

If this proposal were to pass, Southeast Alaska would take a major hit both economically and culturally. At the last board meeting in Ketchikan, the board heard testimony from commercial fishermen, hatchery operators, municipalities, resident sport fishermen, charter operators, lodge owners, native organizations and community members all unanimously opposed to the 25% cut in production. The economic hit to fishermen and hatcheries from a 25% cut in chum salmon would be felt immediately and would reverberate. First would be the allocative battles; where to cut, who gets the axe. You, the board, would certainly have more whiny allocative testimony with fishermen at each other throats. In Southeast, we have been effective at working together in recent years to avoid these contentious situations. Next to fold would be the external positive programs that the hatcheries provide. Chum salmon pay the bills for many things, including community outreach and educational opportunities like the elementary school students coming to DIPAC to experience the aquarium and touch tanks to learn about salmon life cycle and local sea creatures, hatchery sponsored college scholarship programs for local residents, as well as yearling production of King and Coho for sport and troll opportunities. Without chum salmon production footing the bill, none of these other vital functions of the hatchery programs would be viable.

But all these arguments you've likely heard already, most of you last year in Ketchikan. If the near unanimous regional opposition to this proposal and its brethren last year aren't enough to convince you of the value of the hatchery programs to the Southeast region, let's explore what the hatchery program is *not* doing. Let me try and convince you of the impact hatchery production isn't having on wild stocks.

There has been plenty of ink spilt and many wild theories thrown out around what is going on with the salmon. "Where have they gone!?" "What happened to the good ol' days?!" "The salmon are in trouble!"

2013, when we shattered the state record for total salmon harvest, was eons ago! And the next highest harvests are 2015, 2023 and 2021. Ancient history!

In all seriousness, there are real problems facing many regions in Alaska. Chinook and chum stocks in the Yukon come to mind, and chinook stocks coast wide have been a source of worry for all salmon users. Sea surface temperatures are warming and size at age in chinook is on the decline. There are less old, large chinook coming back than there used to be, and there is real cause for concern in our changing ocean and world.

I understand much of the scrutiny toward pink and chum hatchery production stems from an idea that increases in hatchery production may have negative impacts on chinook stocks. The marine food web is a vast and incredibly complicated place. I don't think we can know exactly what impact human intervention of all types is having on salmon—whether it be warming of the ocean, the hunting or lack thereof of predators, shipping, commercial fishing, or hatcheries. That said, when it comes to hatchery chum implications on king salmon, we have a pretty good test case for effects with DIPAC and the Taku River.

DIPAC is a hatchery organization in Juneau that releases primarily chum salmon, as well as sockeye, coho and chinook. The hatchery is permitted to release roughly 135 million chum, 1.5 million coho, 1.25 million chinook and is roughly 15 miles from the mouth of Taku Inlet, Southeast Alaska's largest chinook producer. DIPAC's production ramped up and stabilized around 1990. If there's a causal link between chum salmon hatchery production and chinook, we would expect to see it most pronounced by comparing the onset of DIPAC with the production of the neighboring Taku chinook. If we were to do that, we would see the onset of DIPAC chum programs matching up with a period of the highest chinook productivity on record for the Taku. Does that mean that DIPAC chum production are the reason chinook productivity was up in the Taku in the 90's? I doubt it. I think coincidence is more likely. These two systems give no indication of being coupled, even though they are direct neighbors, sharing migration

corridors and inshore habitats. It seems hard to believe that if DIPAC chums don't show causal negative relationships to Taku chinook, how would they impact Yukon fish, which hit the ocean roughly 1,100 miles away from Juneau, as the crow flies?

In recent history, Taku chinook have had a bit of a rough go. Escapements were low, missing escapement for some of the late 2010's and early 2020's. Fortunately though, Taku chinook are on the upswing, making escapement in 2024 and over doubling the lower bound of the escapement range in 2025. Forecasts for 2026 are looking good too. What have DIPAC release numbers done during that time? They have stayed steady.

I am opposed to proposal 172 because it is unnecessary. Southeast Alaska is not attempting to increase production at any of its sights. None of the hatchery organization have any plans to increase production as far as I'm aware.

**Submitted by:** Michael Mickelson

**Community of Residence:** Cordova

I support 162, 174. I oppose 170,171,172,174,176,177. I'm a subsistence, sport, and commercial fisherman, and a lifelong resident of the Cordova area.

170-172. These hatchery proposals and variants thereof have been dealt with over and over by previous boards and they have always failed. There is no link between hatchery production and the failure of runs on the Y-K delta. If it was as simple as shutting the hatcheries down to get kings and chums back into the Y-K region we would already have done it. Reducing hatchery production is not going to make the warm water blob in the ocean stop effecting feeding habit of Y-K salmon, nor is it going to make the in river water cooler, but it will have real world and immediate impacts to the areas of the state that depend on hatchery production.

The 25% reduction of pink and chum production will have major impacts to statewide hatcheries. Many of the private non profit hatcheries generate most of their revenue from cost recovery for pink and chum salmon. Many of the hatchery operators use this pink and chum revenue to pay for fish production that is more complicated, time consuming, and expensive; for red, silver, and King salmon. Cutting the pink and chum production for private non profit hatcheries, puts these other species enhancement at risk, for some operators, and others will have to completely shut down programs for red, silver, and king production. The revenue from pink and chums provides opportunity for red, king, and silvers for sport, in some cases personal use, and in several locations, subsistence fisheries, including the Copper River, which is especially beneficial on years where wild stocks are barely meeting their escapement. These programs take pressure off of wild stocks. The Copper River has had the most consistent king run in the state and is located very close to major hatchery releases.

In regard to straying, the hatchery research project is a multi year project on Pink and Chum salmon from Prince William Sound and Southeast AK that has been investigating the effects of hatchery straying and wild interaction. So far this project has generated more questions than it has answered in regard to the fitness of hatchery/wild offspring. Wild fish that spawn in their streams of origin tend to return to the same 3'x3' stretch of gravel. So when hatchery strays arrive they may arrive too late or too early, may not find a partner, or find all the good spots taken. There are a lot of factors at work and there are people much more knowledgeable than me that should be consulted. These are not simple processes and draconian measures are not going to help statewide salmon populations. Thank you for your time.

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My name is Rowan Miller. I am a lifelong Alaskan in Valdez and third generation commercial fisherman. I have been fishing my entire life and have just purchased my first boat to seine PWS and longline. My concerns about the Board of Fish proposals have to do with the uncertainty of the future. I cannot continue my livelihood and my community cannot continue to thrive if we do not take stewardship seriously and manage our fisheries with sustainability in mind. However, much of the current uncertainty and instability comes from politicking. Different interest groups debating over the same resource and trying to manage them differently is a recipe for failure. We must work together if we are to make it into the future with our fisheries intact. I support any measures taken for conservation with scientific backing and collaboration with the groups impacted. I do not support measures taken without scientific basis and those that are based on personal interests.

Prop 163: Oppose

This proposal comes from an organization that claims to work with multiple interest groups including sport and commercial fishermen and Native Alaskans. However, there is little transparency about who the group is, when they organized, or any other information. They also do not work with trawlers, according to their website. This proposal would arbitrarily change a definition to make incompatible with reality and put an undue burden on the fishermen to prove they are operating in the manner in which they are already required to. There is also no evidence that this is necessary to help management.

Prop 164: Oppose

I oppose this proposal due to the lack of clarity over how this could be implemented and the lack of collaboration with the trawl fleet. I support more monitoring to reduce bottom impact and bycatch, however I do not think that this proposal is right for that.

Prop 165: Support

Since this proposal is specific and designed to require well defined equipment that is already proven to be effective, I will support it.

Prop 169: Support

I support this proposal to add a definition for gear that is already in use, however my concern is that it will unnecessarily limit the development of that type of gear.

Prop 170: Oppose

Some version of this proposal has been in front of the Board at least seven times in the last five years. It is not and has never been supported by scientific evidence or concern for conservation. It is simply a personal vendetta. It has now also been taken up by sport fishermen who believe that it will personally benefit them by harming commercial fishermen. However, anything done to the unfair detriment of one user group will negatively affect all of us. This proposal in particular will harm the sport fishing industry in the Valdez area and the subsistence users of Tatitlek as the VFDA hatchery uses cost recovery for pink salmon to fund the coho run for the sport fishery and the Village of Tatitlek. VFDA and CDFU have submitted further comments to oppose this proposal so I will not repeat them here.

Prop 171: Oppose

There is no conclusive evidence yet that a proposal of this type is necessary for conservation purposes. Studies on the subject have not demonstrated any harm or provided any specific recommendations on how to prevent harm. Again, please see VFDA's comments for more information. Again, this is a proposal based on personal interests and not the greater good. This proposal was not created in collaboration with ADF&G which is shown by the fact that it is unspecific and misinterprets the studies that it cites. It also attempts to usurp authority from ADF&G and a regulatory process that already allows for public comment.

Prop 172: Oppose

All increases in hatchery production already are approved in a process that involves ADF&G, the RPT, the public, and the commissioner of ADF&G. This proposal calls for an arbitrary bypass of that system. Decisions for conservation and sustainability purposes must be made based on data and community involvement, and this is not. It also attempts to usurp authority from ADF&G and its commissioner.

Prop 174: Support

This a proposal from fishermen on their own fishery. As CDFU states, there should not be negative consequences for safety, conservation, or management. My view is that this will in fact increase the long term health and safety of crew as it will slightly decrease exposure to harmful noise and other consequences of running engines. I also support anything that will decrease the carbon footprint of our fisheries and I believe this will, even if by a little bit.



Prop 175: Support

I support this proposal as it will increase survival of catch and release fish. The Ahtna Intertribal Resource Commission has stated their position on this before and has been able to provide sound reasoning in support of these changes. I believe it is specific enough to avoid any unintended negative consequences on disabled fishermen.

Prop 176/177: Support

I support this proposal because I believe it will reduce catch and release mortality of fin fish.

Prop 178: Oppose

This proposal is too unclear in its language.

Prop 179: Support

This proposal was developed by an individual with conservation concerns with the collaboration of ADF&G staff. Chinook salmon stock concerns have been a major concern state wide for years and the state and federal government have failed to take adequate action to address these concerns. I believe this a major step in the right direction even if it is a but of a sledgehammer approach to something that could use a scalpel. It also addresses my concerns with sport and personal use fisheries of “double dipping”.

Prop 180: Support

I support this proposal for the reasons stated above. I am very much in support of further development and requirement of in season harvest reporting. However, I am concerned that the limit of 5 (or 10 in the case of prop 179) is arbitrary.

February 29, 2026

Alaska Department of Fish and Game

Alaska Board of Fisheries

PO Box 115526

1255 W. 8<sup>th</sup> st.

Juneau, Ak 99811-5526

RE: State wide fin fish proposals and supplemental issues

Chairman Carlson-Van Dort and Members of the Alaska Board of fisheries:

I am writing to state my vigorous opposition to proposals to **170, 171 and 172.**

I am a second generation commercial and subsistence fishermen, My daughter Rowan is the third generation, having fished 12 years on our family vessel, and has recently purchased her own vessel, made possible in part by the boards actions to allow permit stacking.

I have been active on the PWSAC Board, currently I am a member of the Valdez Fisheries Development Association(VFDA) Board. I am a current a member of and past chair of the Valdez/PWS Advisory committee. I also served for many years on the Prince William Sound Regional Citizens Advisory Council.

Stability and sustainability is of paramount importance to the long term health and fiscal viability of Alaska's coastal communities and hatcheries have played a huge role in that stability since their creation in 1974 by the State of Alaska.

Hatcheries create jobs, contribute taxes, pay for research(\$4.25 million into the Alaska Hatchery Research Project alone), reduce pressure on wild stocks, Fund and provide for sport and subsistence fisheries, fund habitat restoration efforts and help sustain the biologic and economic engine that keeps our communities viable.

VFDA Coho production supports one of the largest sport fisheries in the state with \$1,500,000.00 sport fish economic impact annually, in addition to an annual release of 20,000 SGH coho smolt in Boulder Bay at no cost in cooperative partnership with the Native Village of Tatitlek to provide local subsistence harvest opportunities. There is a similar program near the Native Village of Chenega supported by PWSAC. As well as in Whittier. These programs are paid for almost entirely by pink salmon produced by hatcheries in Prince William Sound.

Proposals **170, 171, and 172** if passed **WILL** destroy all of that.

### **Proposals 170 and 171**

First proposed in 2018 and rejected repeatedly by the BOF is Capricious and Arbitrary and unsubstantiated. The Authors have not provided any evidence to support their claims of harm to wild stocks. They have ignored valid and current scientific research showing the effects of climate, predation, water flow, temperature fresh water environmental conditions on stocks in western Alaska. They have ignored the results of the Alaska Hatchery Research Project.

**Proposal 171** does not provide any specific actions for the board to consider, rendering any action taken by the board in support of the proposal as arbitrary and liable to be over turned by the Judiciary. It ignores the findings of the Alaska Hatchery Research Project and maliciously and deliberately misrepresents the 2018 pilot study; *Observations of Pink Salmon hatchery proportions in selected Lower Cook Inlet escapements.*(Otis et al)

Hatchery pink salmon production accounts for just 15% of all pink salmon in the North Pacific Ocean. Alaska hatchery production accounts for just 4% of the total hatchery production in the North Pacific Ocean. A statistically insignificant amount, not capable of the large scale trophic disruptions attributed to them.

Adoption of **proposals 170 and 171** would have an immediate deleterious affect on the Hatchery programs ability to fund; subsistence and sport fish programs, commercial programs, research, debt retirement, habitat restoration, infrastructure maintenance and replacement. It would force immediate layoffs of staff, bankruptcies and social upheaval with out addressing the real issues threatening western Alaska stocks.

### **Proposal 172**

A Board generated proposal to place a moratorium on hatchery production exceeds the boards authority and preempts the Commissioner's Statutory role and authority and that of the Regional Planning Teams as outlined in 5AAC 40.340.

Taking positive action on this proposal will violate State of Alaska conflict of interest rules, exceeds the Board's authority and will be subject to overturning by the Judiciary branch of the State of Alaska.

The Commissioner alone has the authority to take this action and the hatchery programs have honored an understanding Commissioner Vicent-Lang outlined in RC240.

I urge you to reject **Proposals 170, 171 and 172.**

I also urge the Board to reject **Proposals 11, 163, 166, 176 ,177, 178, 181, 182,183 and 184.**

I support **Proposals 174 and 175**

Thank you for your time and consideration of these comments.

Thane Miller,

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Trevor Miller, and I am a commercial fisherman and subsistence user based in Wrangell, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. A 25 percent reduction in hatchery eggs would significantly hurt our commercial fleet and sport and subsistence fishermen in Southeast Alaska. The majority of our gillnet fleet relies on hatchery chums to make their money, along with a large portion of our seine fleet. Without these successful chum returns, the commercial fishermen in Southeast would not be able to keep their businesses running. For the commercial trollers here in Southeast, the hatcheries also provide steady income. In early season, they are able to target hatchery kings, and in late season, the hatchery chums, giving them more opportunity to turn a better profit. For us in Wrangell and Petersburg, we use the hatchery king salmon returns in Anita Bay and Blind Slough to get our subsistence fish.

Where I live in Wrangell, we have three seafood plants. In a town of only 2,000 people, we would take a significant hit economically, as we rely heavily on the fishing industry, especially our hatchery chum salmon. This would take money away from all of us fishermen, the processors, and our community in general.

I think the real problems are marine mammals and heavy sport pressure in the rivers that are seeing declined king returns. The marine mammals in Alaska have gone unchecked for more than 50 years. We have no way to manage them due to the Marine Mammal Protection Act, and they are able to gather in massive numbers in front of river mouths, putting heavy pressure on salmon when they are almost to their spawning grounds. For example, the Stikine River has multiple sandbars with 400 to 500 seals apiece, and then at the mouth of the river on a small island there are normally 300 to 500 sea lions. That to me seems like a real issue affecting wild salmon stocks, along with heavy sport pressure in prior years in places up north in Alaska like the Kenai Peninsula and Cook Inlet areas.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Trevor Miller  
Wrangell, Alaska



March 2, 2026

Dear Members of the Board of Fisheries:

My name is Isaac Milligan. I have been a crew member on Kodiak salmon seine boats for 20 years. I own a home in Kodiak and support my family through fishing.

Kodiak's hatchery allows wild runs to share the burden of supporting the fleet. It spreads fishermen across areas and reduces concentrated pressure. Restricting hatchery production would increase competition in wild stock areas and significantly reduce income for the fleet.

Reduced revenue would impact ADF&G funding, processors, city fish taxes, marine trades, and local businesses.

Kodiak appears to maintain a balanced hatchery system that works. I do not believe reductions should occur without solid scientific backing from ADF&G.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Isaac Milligan  
Kodiak, Alaska



**Submitted by:** David Million

**Community of Residence:** Mat su

Proposal 186 written by Andy Couch.

I support this proposal. My wife have been fishing the Little Su for 31 years. We have seen a slow year once in awhile, but nothing as bad as the last few years. In my opinion the fish just are not getting into the river systems. I don't know if the problem is on the high seas or in the cook inlet. I along with everyone I know who fish in the valley know there is something drastically wrong. Something needs to be done,so family's can put a fish or two on the table. Please take this proposal into consideration.

Thank you .

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March 1, 2026

Alaska Board of Fisheries  
Statewide March 2026 meeting

Re: Opposing Proposal 170

Submitted by Ian Bering Moller

Chairman Carlson-Van Dort and Board Members:

I am a 20-year-old commercial fisherman, born in Juneau and raised on the F/V Mikiah Bay and I oppose Proposal 170. I have fished aboard the Mikiah Bay every season since I was 3 years old. At 16, I bought a Dungeness crab permit with a loan through the State of Alaska commercial fishing loan program. At 17, I became the skipper of the Mikiah Bay (a commercial fishing business built by my dad). At 18, I bought my dad's SE gillnet permit and 40% of the F/V Mikiah Bay, including crab pots, shrimp pots, nets, gear trailers and trucks.

Last year, the Alaska Legislative Seafood Task Force released its final report on the state of Alaskan Fisheries. Three key quotes highlight the crisis:

- 1). "The seafood industry, which includes fishermen, processors, and communities, is in a state of crisis. *It has been called a perfect storm by many. This is not an exaggeration, the report further states.* "Fishermen have reduced seasons, processors face costly production expenses, labor expenses and environmental obligations. Communities will face reduced raw fish taxes and increased costs providing support to the fishing industry."
- 2). "While Alaska's fisheries remain the "Gold Standard" for responsible, science-based management, the economic model that supports the industry is buckling under immense strain."
- 3). "Salmon hatchery programs in particular contribute significantly to the production of salmon vital to the recovery of the seafood industry."

According to ADF&G staff comments on this proposal, a 25% reduction in hatchery production could cost local economies and processors \$23 million annually. These losses in hatchery production could destabilize their operations and negatively impact their ability to process wild fish. Additionally, a 25% cut in hatchery production is uncertain and may or may not result in any positive effects on wild salmon stocks.

I still owe the state of Alaska, Division of Investments \$28,000 for my Dungeness crab permit and tens of thousands to my dad for 40% share of the Mikiah Bay commercial fishing operation. This is a heavy debt load for a 20-year-old trying to make it as a commercial fisherman. Hatchery chum salmon make up over 65% of my overall fishing portfolio (85% of my salmon fishery) and a 25% reduction in hatchery production could be the difference for me making my loan payments or not. My other fisheries include Dungeness crab and spot prawns, and it is critical that I have a processor to deliver to. I am concerned a reduction in hatchery production could jeopardize this given there are only a few processors left in southeast Alaska. This is not a time to reduce hatchery production and to my knowledge, there is no science to support reductions. If hatchery chum production is reduced, I will be forced to target wild salmon, including reds, silvers and kings to make my loan payments and if I'm really fortunate, maybe earn enough to pay my electric bill.

For decades there's been talk about the 'greying of the fleet' and who that next generation of Alaskan fishermen will be. I am that next generation of Alaskan fisherman. All I ask is you give me a chance to survive as a commercial fisherman. I ask you don't crush my investments nor my dreams.

My future as a commercial fisherman depends on the Alaska Board of Fisheries making sound, science-based decisions. Proposal 170 falls short of sound science and is speculation at best. I hope my future as a commercial fisherman doesn't teeter on someone's feelings and speculations.

Now is not the time to make wholesale changes to Alaska's Hatchery Programs.

Please make the right science-based decision and vote down Proposal 170.

Sincerely,



Ian Bering Moller  
F/V Mikiah Bay  
Juneau, Alaska



**Submitted by:** Tollef Monson

**Community of Residence:** Kodiak

I strongly support prop 167. Restricting boats from cheating by using their reels to longline jig cod at night is out of control. Immediate measures need to be implemented to protect the quota and honest fishermens efforts and investments. This is apparent to many many jig fishermen is difficult for enforcement to catch the illegal and unmarked longlines that we have seen. Thank you

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is James Moore, and I am a commercial troller with 55 years of experience in Southeast Alaska. I am a former president of the Alaska Trollers Association, a board member of the Northern Southeast Regional Aquaculture Association, and Secretary-Treasurer of Armstrong Keta Inc. I own and operate the fishing vessel Aljac and submit this comment on my own behalf.

Reduced hatchery production would directly and negatively affect the viability of my business and those of my two sons, who also depend on fishing for their livelihood. Reductions in hatchery egg takes would disrupt the business plans of private nonprofit hatchery associations, reduce their ability to repay loans to the State of Alaska, and could lead to bankruptcy and loss of significant contributions to common property fisheries.

Much of Southeast Alaska hatchery production was founded as mitigation for the fishing community after Alaska gave up harvest share of Chinook salmon under the International Pacific Salmon Treaty. These programs provide life support for an iconic industry and way of life under threat from unstable markets and rapidly changing ocean conditions. Without this stability, many fisheries and communities may not survive.

Fishermen have contributed three percent of gross income for decades to build what I believe is the best salmon aquaculture program in the world. These are fisherman-directed, community-based hatcheries guided by scientists and biologists, not corporate ventures. Hatcheries function as living laboratories that advance salmon science and sustainability.

Significant scientific contributions have already come from these programs, including research on straying, long-term predator studies, otolith data collection across the Pacific, and maintenance of research facilities such as Little Port Walter. These programs are proven, self-supporting, and essential.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

James Moore  
Southeast Alaska



March 2, 2026

Dear Members of the Board of Fisheries:

My name is Whitney Moore. My parents own fishery operations in Alaska. My husband and I own a fishery operation in Alaska, and I own Alaska Maritime Documentation Company. Our family operates vessels including Cape Karluk and Vicki K through Outlaw INC and Rhoda Je-Anne INC.

These proposals would have serious financial consequences for my family. The fishery operations alone could face catastrophic impacts, and my documentation service business would also experience significant decline. When fishermen earn less income, they delay vessel transactions and capital improvements, which directly impacts the broader marine service sector.

Alaska's salmon fisheries are foundational to our communities. Thousands of commercial, sport, and charter families rely on this industry. Reduced harvest opportunity means reduced spending across coastal economies and long-term instability for rural communities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Whitney Moore

**Submitted by:** Rod Morrison

**Community of Residence:** Thorne Bay

My name is Rod Morrison. I come before you today as an Alaskan who believes deeply in our way of life and in protecting the resources that sustain our families and communities.

Trawlers are taking fish away from the people of Alaska — the very people who depend on those fish to feed their families. In many of our rural and coastal communities, fish are not simply a commodity. They are food security. They are winter meals in the freezer. They are shared with elders. They are put up for our children. When large-scale trawling operations remove massive volumes of fish — along with significant bycatch and habitat damage — it directly impacts the availability of those resources for Alaskans.

For many of us, subsistence is not a hobby. It is a necessity. It reduces our cost of living in a state where food prices are already among the highest in the nation. When fish runs decline or access becomes restricted, it is not an inconvenience — it is a hardship.

Beyond economics, this is about our Alaska lifestyle. Many of us choose to live here because of the ability to live close to the land and water — to provide for our families, to teach our children how to fish, and to pass down traditions that have existed for generations. The freedom to live this way is part of why Alaska is special. Industrial trawling threatens that balance.

I respectfully ask this Legislature to take clear and decisive action by prohibiting trawlers from operating within five miles of Alaska's coastlines. Nearshore waters are critical habitat for salmon, crab, halibut, and other species that our communities rely upon. These areas are also where small boat fishermen, subsistence users, and families harvest their food. Establishing a five-mile coastal buffer would protect essential habitat, reduce gear conflicts, and ensure that local Alaskans have priority access to the resources closest to their communities.

We are not asking to eliminate opportunity. We are asking for responsible management that puts Alaskans first — our food security, our coastal economies, our subsistence users, and the long-term sustainability of our fisheries. The resource belongs to the people of Alaska. It should first serve the people of Alaska.

Please stand with the families who depend on these fish not for profit, but for sustenance, culture, and the preservation of our way of life.

Thank you for your time and your leadership.

**Submitted by:** Jeb Morrow

**Community of Residence:** Petersburg

Hi,

20 years ago when I was on the advisory panel for the NPFMC, the issue around "non bottom" trawlers was where they should be allowed to fish in the Bering Sea federally. John Govin got up there and educated us all on how great these new salmon excluders would truly...ahem...exclude many of the concerns around leaving these 350' draggers to do business where the fish were thickest; surprise, where the salmon are thickest also. Now there's no salmon. Hmm. Now it's about getting as close to the bottom as possible. So close in fact they're catching a ████████ of sablefish. I know. I've fished around them for years in the Aleutians. As state board members I would assume you have fewer dragger hats amongst you than does the council. Hold your ground.

thanks,

Jeb Morrow

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Robert Mosher, and I am a commercial fisherman based in Juneau, Alaska, and the owner and operator of the F/V Persistence.

I am writing to urge the Board to reject Proposals 170, 171, and 172. As a commercial fisherman whose livelihood depends directly on hatchery production in southeast Alaska, I have urgent concerns about these proposals and their impact on my business, my community, and the future of Alaska's fisheries.

If Proposals 170, 171, and 172 were to pass, it would destroy the drift gillnet fishery in southeast Alaska. The wild stocks could not sustain the commercial fleet as we know it now. The wild stocks could not support the charter, sport, or subsistence needs at the levels that now exist. The commercial drift gillnet fishery is the cornerstone of my operation. Without hatchery fish, my business would be precarious at best.

Salmon fishing is a big deal in northern southeast. Without the support of hatcheries, commercial fishermen, processors, and support businesses would struggle at best to survive on wild production. I believe the needs of subsistence, personal use, sport, charter, and wildlife would severely strain the wild runs if not for our fantastic hatchery programs. Every business sector in southeast would be affected by cuts to hatchery production.

I feel our whole regional economy is at risk if egg takes or production is cut at our hatcheries.

We have spent 40 to 50 years and millions of dollars building the infrastructure and knowledge to operate these hatcheries. It terrifies me that these uninformed proposals could bring it all crashing down for no good reason.

Alaska is a big place. Punishing one region for problems in another is not fixing anything. It is worth noting that Alaska hatcheries are not the only ones putting hatchery fish into the North Pacific. I do not believe sabotaging our successful hatchery programs is going to accomplish anything. I also feel that what would help salmon in Alaska would be amending the Marine Mammal Protection Act to allow us to manage seals, sea lions, and whales. Marine mammals are having a huge negative impact on Alaskan salmon.

Anyone who loves wild salmon should love hatcheries more. Hatcheries help to lessen the pressure on wild stock, particularly those experiencing troubles.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.



Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Robert Mosher  
Juneau, Alaska



**Submitted by:** Ashley Mullen

**Community of Residence:** Shoreline, WA

I am writing to oppose Proposal 186. I was born and raised in Soldotna and most of my family still resides there. I grew up commercial fishing with my father in Cook Inlet, and have continued to do so for the past almost 30 years. My young adult children now participate in the fishery as well. During the summers we live in Soldotna with family, and contribute to the local economy and community. My children have come to think of Soldotna and Cook Inlet as a piece of home.

Proposal 186 continues to unfairly degrade the commercial sockeye fishery in Cook Inlet. It does not meet Agenda Change Request emergency requirements and is opposed by ADF&G in Staff Comments on ACR 5.

This proposal denies the drift fleet further opportunities to harvest sockeye during the short weeks the fishery is active and risks continually and detrimentally over-escaping the Kasilof and Kenai Rivers with sockeye. It also risks further alienating and pushing out commercial fishermen in Cook Inlet. Without a setnet fishery and without drift fisherman willing and able to harvest surplus sockeye, these rivers would be in great jeopardy.

This proposal is highly allocative, out of cycle, and not biologically sound... no UCI Coho are listed as stocks of concern.

Please deny Proposal 186.

Sincerely, Ashley Mullen

**Submitted by:** John Murray

**Community of Residence:** sitka

Proposal 163 SUPPORT I believe a definition of mid-water trawling is needed and appropriate. The Boards action should apply to intent and definition. The State will be leading the way on this issue. My observations from actions by the NPFMC are they are mired in process and cannot get off the dime on what mid-water trawl really is. The State should step up .

Proposal 164 SUPPORT I think this is the right direction but not certain of the cost , effectiveness or if it is practical to use gear -mounted sensors. Overall we need to curtail bottom trawl with mid-water gear.

Proposal 170 Support ( with amendment to take out "chum salmon" in this proposals.My reasons for support. Please see ADFG report on FEEDING ECOLOGY OF PACIFIC SALMON.

Backround - Coho and King salmon have had reductions in OVERALL SIZE AND OVERALL NUMBERS in my experience commercial fishing for 40 season.Pink salmon are a direct competitor for forage food in the Northern Gulf of Alaska. This is particularly true with one of the main forage fish Berryteuthis anonychus, coho are very reliant those fish. Kings are also to some extent. I'd say krill is another forage fish that faces upward pressure from pink salmon at the expense of coho and king salmon.

I feel it is prudent to take a more precautionary stance on pink salmon releases. Is there a smoking gun? No, but the writing is on the wall other ways.

Proposal 176 OPPOSE My reasons for opposing:

1) The so called " money fish" King salmon , halibut , yellow eye rockfish are already under too much pressure. As far as king salmon and halibut in many areas are having escapement concerns as you know. Add in the allocation aspects BOOM .This proposal will add to problems managing these fish by ADFG via EO's in - season which no one really cares for.

2) " Sleaze factor" for two reason this will happen if this proposal passes. 1) crew can harvest and give to clients fish they catch. 2) Pooling fish will lead to maximizing harvest.

3) Enforcement issues - while currently pooling and crew harvest takes place that doesn't make it right or ethical. This proposal seeks to legitimize a practice that is currently illegal in most cases . In SE AK some species with little conservation or allocation issues crew can retain and then give fish to clients.

In SE , South Central, Kodiak king salmon are under escapement and or under Stocks of Concern management . This is a time to " tighten our belts" not add to harvest. Halibut while not managed by State is very low abundance levels.

I am am roundly opposed to this proposal and see Proposal 178 being a better vehicle.

Proposal 177 OPPOSE Basically the same proposal as 176 but this takes the crew out of the picture. I oppose this " convenient" change . It will legitimize pooling .

An example of the issue in SE AK. there is the king salmon season before the other salmon arrive . When the client has caught their king for the day or annual harvest . The clients should not be allowed or it be condoned to keep fishing to help out a party member that hasn't got their limit. Yes it happens but that doesn't make it right or legal.

While this currently happens it is illegal to pool fish. In the clients want to pool fish do it after the trip.

" its fishing not catching" you go out you aren't guaranteed your catch. This makes it more likely you will get your limits.

Again I'll point out king salmon, halibut ,yellow eye rockfish harvest are already maxed out.

See proposal 178

Proposal 178 SUPPORT ( with amended language) .

The intent of this proposal has merit it needs work language wise . I hope the Board can make this proposal work via amendment.

Here again this is a "common practice" . It doesn't rely on pooling catch I HOPE? It could lead to that. The intent is to help anglers that need a hand youth and people who need assistance. So the intent is in the right place the language needs work.

Proposal 183 OPPOSE( as written) This proposals needs a pile of work . It would be a totally unneeded as written. As well as a imposition on anglers as written. Some species need this regulation in place not all finfish.

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MARCH 2, 2026

ALASKA BOARD OF FISHERIES  
P.O. BOX 115526  
JUNEAU, AK 99811-5526

**RE: STATEWIDE FINFISH & SUPPLEMENTAL ISSUES**

PROPOSALS 162, 163, 164, 165

DEAR CHAIR CARLSON-VAN DORT & MEMBERS OF THE BOARD,

I am writing on behalf of Native Peoples Action and Native Peoples Action Community Fund (NPA/CF). We are a statewide bipartisan organization dedicated to uplifting Alaska Native voices. Our mission is to protect our ways of life by working together and ensuring Alaska Natives are heard in all levels of policy making. We are submitting our position on the following:

**PROPOSAL 162:** NPA/CF supports this proposal to prohibit commercial transport services for compensation in subsistence fisheries, in addition to the existing prohibition of fishing guide services in state subsistence fisheries. We support protecting subsistence fisheries as completely noncommercial. "Subsistence use" is defined by statute (AS 16.05.940) as "the noncommercial, customary and traditional uses of wild, renewable resources by a resident... for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation..." Commercializing a noncommercial fishery goes against the very definition of subsistence, and we request the Board deem receiving compensation for transportation services in subsistence fisheries in violation of the statute.

**PROPOSAL 163:** NPA/CF supports this proposal to define all trawl gear operated inside state waters as non-pelagic and develop new performance and monitoring standards to allow pelagic trawling in state waters to occur on a case-by-case basis.

With the increased evidence and testimony of midwater trawls coming in contact with the seafloor, we believe increased monitoring is necessary to improve the enforcement of current regulations and accountability of the trawl fleet. Ensuring this gear is not coming in contact with the seafloor is crucial to the sustainability of all fisheries.

**PROPOSAL 164:** NPA/CF supports this proposal to establish bottom contact monitoring requirements for pelagic trawl gear operated inside state waters. For the same reasons listed previously, we support increased monitoring for these fisheries. The addition of sensors would verify compliance and guarantee less contact with the bottom.

**PROPOSAL 165:** NPA/CF supports this proposal to establish salmon excluder requirements for all pelagic trawl gear operated inside state waters. True midwater trawl fishes multi-species zones, and bycatch is not mitigated under 5 AAC 39.105. Salmon excluders have been proved to release up to 30% of salmon caught in trawl nets. Alaska state law directs this Board to provide a reasonable opportunity for subsistence before other uses of any harvestable surplus of a population [AS 16.05.258 (b)]. By requiring salmon excluders, it would help these salmon get to their spawning grounds, and therefore, give the people of Alaska more subsistence opportunity.

**PROPOSAL 175:** NPA/CF supports this proposal to modify dipnet mesh size and configuration. With the decline in Chinook stocks statewide, we support any effort to decrease Chinook mortality when being released from dip nets.

In closing, NPA/CF would like to uplift the traditional knowledge being provided and applauds the Board for making space specifically for Traditional Knowledge Reports. Thank you for taking the time to hear our concerns and for your service on the Board.

Respectfully,



KELSI IVANOFF | KASAŃNAALUK  
NATIVE PEOPLES ACTION/NPA COMMUNITY FUND



## Chenega IRA Council

3000 C Street, Suite 301  
Anchorage, Alaska 99503-3975

February 10, 2026

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Opposition to Proposals 170, 171, and 172 (Pink and Chum Hatchery Cuts)**

Dear Chair Carlson-Van Dort and Members of the Board,

On behalf of the Chenega IRA Council, we respectfully submit this comment in opposition to Proposals 170, 171, and 172, which would reduce or freeze pink and chum hatchery production statewide.

The Chenega IRA Council is the federally recognized tribe serving the Alutiiq people of Chenega. Chenega is located in Western Prince William Sound on Evans Island. The Chenega people have historically subsisted on fish and other natural resources throughout Prince William Sound for thousands of years. We are strongly dependent on subsistence fishing and harvesting to support food security for our community, as well as to retain our ties to our culture and heritage.

The Chenega people are also active in local commercial fisheries, in particular as it relates to salmon fisheries. We have a number of tribal members who participate in commercial fishing as well as a number who maintain set-net sites in PWS. A healthy and thriving fishery is essential to all of our community members whether it relates to subsistence harvest or commercial fisheries which create economic opportunities in our region.

Hatcheries also play an important role in supporting subsistence and sport fishing opportunity in many regions of Alaska, and in Prince William Sound particularly. Hatchery production helps stabilize access to salmon for food security, cultural continuity, and local harvesting traditions, while also supporting sport fisheries that contribute to local economies and community vitality. Sudden blanket reductions in hatchery production risk reducing fishing opportunity and shifting pressure back onto already vulnerable wild stocks. It also undermines the role of communities, including remote Indigenous communities like Chenega, in the stewardship of their own resources and access rights.

Our communities have worked hard through significant adversity to maintain access to salmon. The 1964 earthquake and Exxon Valdez oil spill imposed catastrophic loss of opportunity and cultural access for many years. Hatcheries have been a part of our recovery and renewed access to salmon for food, education and priceless traditional practice. Main Bay hatchery sockeye are the primary source of subsistence salmon for our community members, but once again they are worried about losing access. It is critical that another generation does not lose this salmon relationship and the food security it provides, and critical that the Board of Fisheries respect the needs of and leadership from the place-based people of Prince William Sound in the management and stewardship of our local resources.

In many regions, hatcheries operate in close partnership with local and independent organizations, supporting community-based enhancement, local stewardship, and shared infrastructure. These partnerships strengthen local capacity and allow communities to participate directly in sustaining nearby salmon resources. Policies that weaken hatchery systems risk undermining these long-standing collaborative relationships.

Hatcheries are also essential scientific institutions. They provide long-term data, technical expertise, broodstock management, disease monitoring, and applied research capacity that support salmon recovery and adaptive management. At a time of rapid environmental change, Alaska should be strengthening this scientific infrastructure rather than constraining it through blunt production mandates.

Most importantly, these proposals raise concerns about regional self-determination and local authority. Decisions about how salmon resources are managed and enhanced should remain grounded in regional and Indigenous knowledge, local partnerships, and established permitting and scientific processes. Statewide production mandates, or overreaching directives coming from outside the region, risk overriding locally informed management approaches and diminishing the ability of communities to shape the future of their fisheries.

For these reasons, Chenega respectfully urges the Board of Fisheries to take **no action** on Proposals 170, 171, and 172 and to continue supporting regionally grounded, science-based hatchery management that protects subsistence access, community partnerships, and long-term salmon resilience.

In addition, we support proposals 163, 164 and 165, which offer improvements to Alaska's pelagic trawl operations. It addresses several of our concerns around groundfish management, including reductions in salmon bycatch, impacts to ocean habitats, and accountability tools for groundfish fleets. 163 and 164 are necessary to bring the pelagic fleet into compliance with existing regulations around bottom contact in state water. Strict compliance with gear definitions and operating standards must be strongly enforced in all of our commercial, sport and subsistence fisheries, and this gap in operational monitoring and enforcement for Alaska's largest fleet must be addressed as it would in any other fishery. 165 is a common sense step, requiring salmon excluder regulations for the Gulf trawl fleet. These are nearly universal practices as those that are used in the Bering Sea, and are a proven tool to reduce salmon bycatch. As a representative of Indigenous people heavily dependent upon salmon, we support these practical tools to keep more salmon in the water.

Finally, we oppose Proposal 187 and urge the Board to take no action. This proposal would eliminate a long-standing, small-scale commercial fishery that has supported Indigenous and local families from Yakutat and Cordova for generations, effectively reallocating the resource to nonresident sport users who already achieve daily limits with minimal effort. That outcome undermines equitable access and conflicts with the principle that local communities should retain meaningful authority over the stewardship and use of their traditional resources. The proposal also rests on inaccurate claims about habitat change and conservation risk: the natural confluence of these river systems has been a gradual process observed over many years, not a sudden storm event, and since full connection occurred in 2024 the Tsiu River has met or exceeded escapement goals through two commercial seasons without incident. The only legitimate conservation concern in this system is chronic over-escapement, not harvest pressure. With participation typically limited to only a handful of permits and openings often constrained by weather, commercial harvest has been modest and functions as an important management tool for maintaining long-term system health. Removing this tool would weaken, not strengthen, responsible stewardship and could create the very conservation risks this proposal claims to address.

Thank you for the opportunity to comment.

Respectfully,



Charles W. Totemoff  
Chairman

CC:  
Chenega IRA Council  
Josie Hickel, Chenega Regional Development Group

# Native Village of Eyak

110 Nicholoff Way

P.O. Box 1388

Cordova, Alaska 99574-1388

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www.eyak-nsn.gov



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Board of Fish, Statewide Finfish and Supplemental Issues  
Native Village of Eyak Proposal Comments

Proposal 162: **SUPPORT.** The Native Village of Eyak is extremely sensitive to subsistence users having issues accessing fishing sites because they do not have access to boats. However, we have also seen firsthand, that the line blurs between transporter and guide services, and abuse of that system. Subsistence is meant to be a noncommercial activity, as the proponent indicates in their proposal. Compensating a boat owner who provides a subsistence user access to a subsistence fishery is limited to the cost of any bait and fuel used. The cost associated with boat maintenance and the owner/operators time are not eligible for reimbursement. Transporters must charge for all of these costs, or operate at a loss, and so should not be eligible to provide services in a subsistence fishery.

Proposals 163-165: **SUPPORT CONDITIONALLY.** While we do not insist on the exact remedies found in Proposals 163-165, we strongly support 100% observer coverage; bycatch limits based upon the abundance, vulnerability, and impact on bycatch species, NOT as a percentage of target fish harvest; unconditional fishery closure after bycatch limits are reached; and the total prohibition of trawl gear making contact with the bottom. The State of Alaska must either lead the way in reforming trawl fisheries in Alaskan waters, or lead the way in prohibiting the practice entirely in both State and Federal waters; we prefer the former. Sound practices in State fisheries will support and demonstrate the effectiveness of these reforms in Federal trawl fisheries.

If the State cannot deliver a truly sustainable trawl fishery that does not adversely impact vulnerable, valuable, and declining bycatch species such as salmon and halibut, whether it be directly through bycatch of these species, or indirectly through reduction in prey base these species rely upon (i.e. trawlers must not undermine the base of the food web), we must abolish the practice and treat trawl fisheries the same way that we treat fish traps.

Proposal 170: **OPPOSE.** We have seen this proposal at every opportunity for over a decade, and its merit is no greater now than it has been in the past. Its repeated failure through numerous iterations of the Board of Fish is telling. The proposal takes a slightly different form this time, trading stories of backroom deals struck but not honored for “overwhelming evidence.” This overwhelming evidence is a purported literature search of peer reviewed articles. Understanding how such a review is conducted is very important to evaluating the usefulness of that review. However, even if we will give the proponent the benefit of doubt that the review was conducted in a manner to produce an objective and unbiased result, it is intrinsically questionable to lump “adverse” and “minimally adverse” into a group as a single outcome, suggesting an attempt at padding the “adverse” score to create the desired narrative. Furthermore, a literature review is not a poll, and one cannot interpret more scientific literature showing an adverse/minimally adverse impact as greater evidence of a causal impact. This is confusing correlation with causation of a secondary measurement that does not demonstrate what the proponent hopes it will. There is a high level of bias simply in which articles scientific journals accept for publication, skewed heavily towards studies that show



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a significant outcome. This bias in publication does not provide extra evidence for the significant outcomes published. In other words, one would expect the body of literature to be skewed towards articles showing impacts in any discipline. Moreover, the literature review is worldwide, and our focus here is strictly Prince William Sound hatcheries. The Hatchery/Wild Interaction study undertaken by ADFG is well underway and will provide us the insight we need to optimize hatchery production. We understand there have been straying events, and support work to minimize straying based upon sound, focused research, not polemic narrative.

Proposal 171: **OPPOSE.** We understand a straying event was observed, but object to the notion that the studies cited are indicative of Cook Inlet streams as a whole, as these studies focused on those streams where straying was observed. Thus, they are only indicative of stray rates in those “selected” streams. We are in support of hatchery best practices, and numerous studies are underway and being completed. We need to understand whether these are isolated events or happening consistently, we need to understand whether these events are isolated to the “selected” streams, or whether they are widespread. We also need to evaluate techniques to reduce straying without reducing egg take. Finally, were the proponent’s concerns validated, their concerns would not necessarily be addressed by reducing egg take, and a more effective remedy should be used if a negative impact is confirmed.

Proposal 172 **OPPOSE.** We oppose a blanket moratorium here, not because we are supporting of increased egg take numbers, but because we are supportive of the Regional Planning Team (RPT) process, which is open and inclusive. As participants in the RPT process we have not seen these concerns brought up there, in the appropriate setting, in good faith. We fully support wild salmon, and are aligned with the idea that Hatcheries should not adversely impact wild runs. However the data support hatcheries improving both wild salmon production and overall salmon production and harvest. We believe the hatchery system in Prince William Sound, and the management of the salmon fisheries therein have benefitted these runs, leading to the largest wild runs we have seen. We are partners in limiting the impacts caused by straying, but we insist that the onslaught of proposed remedies that have no basis in sound research are not the path forward. The proposal itself shows that the system in place is achieving with the board indicating it would not increase egg take goals. However we should rely on the existing system to forego egg take expansion when appropriate, and expand egg take when necessary, rather than remove the opportunity to evaluate and assess things on a case-by-case basis. There is no need to “codif[y] an informal policy decision” and remove the ability to make good choices in the future based upon one statement made in 2024 when there were no proposals to increase egg take goals in the first place. This is a solution looking for a problem.

Proposal 187 **OPPOSE.** This proposal is overreaching and seeks a one-sided remedy based upon an imaginary problem that is not substantiated by any data. This area is remote, and is characterized by a high energy surf break and a sand bar. This type of system shifts naturally and that should be the expectation. As the substrate shifts the mixed-stock fisheries must adapt their management. But to say that because the outflows of the rivers shifted that one user group on one river must completely alter their use to keep things

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unchanged in a different fishery on the other river is not consistent with the concept of a shared conservation burden.

It cannot be assumed that because the mouth of the Tsiu opens to the Kaliakh that Tsiu fish will be exploited proportionally more than they had been. It is more likely that Tsiu fish will be exploited at a lower rate because the mixed-stock schools will consist of a much higher proportion of Tsiu fish, and that harvests would be reflective of these proportions.

The existing management structure can accommodate a precautionary approach by acknowledging the re-alignment and limiting opportunity within the Tsiu. The manager will understand that Tsiu fish are more likely to be intercepted, but already has the necessary authority to limit both fisheries in such a way that both systems meet their escapement needs.



**A LETTER DEMANDING FAIR AND EQUITABLE SUBSISTENCE FISHING  
OPPORTUNITIES IN THE TYONEK SUBDISTRICT DURING THE 2026 FISHING  
SEASON**

**Dear Board of Fish,**

The Tyonek Tribal IRA Council is the governing body of the Native Village of Tyonek, a Federally Recognized Tribe. Our Village is located on the west side of Cook Inlet approximately twenty miles north of the Kustatan River and approximately seven miles south of the Beluga River. Residents of our community are designated rural under Title VIII of ANILCA, and we are actively engaged in the state managed subsistence king salmon fishery for our subdistrict.

Our people are known as Tebughna, “the beach people” since time immemorial we have fished in the Cook Inlet directly below the site of our Village. Prior to state hood we utilized traditional fish traps, when state hood came about, our traditional methods of fishing were outlawed. In an effort to follow the law we switched from fish traps to nets. To this day we use these nets to harvest king salmon, in the same place we always have - on the beach directly below our Village.

The food security of the residents of our Village and our Tribal Members are directly dependent on the harvest of these king salmon. These fish feed our families and children throughout the winter and are a mainstay in our diet. Reducing the opportunity to harvest or reductions in the number of fish harvested will result in direct, tangible, and legally significant negative impact to our Village.

In years past we were afforded three days a week during which we could set our nets to fill our freezer and smoke houses. During the 2025 fishing season we were only allowed one day a week to fish. This year we are being told by Alaska Department of Fish and Game that our fishing will be cut back from five total twelve-hour periods to only three twelve-hour periods for the 2026 season.

We are curious how the Department plans to make this regulatory change as no proposal nor proposed change has been submitted to the Board of Fish for review. Emergency Orders are for in season management not actions that are planned months in advance of the fishing season. We understand that king salmon run estimates are low, however, AS 16.05.258(b)(4) provides that if:

“[T]he harvestable portion of the stock or population is not sufficient to provide a reasonable opportunity for subsistence uses, the appropriate board shall

(A) adopt regulations eliminating consumptive uses, other than subsistence uses;

(B) distinguish among subsistence users, through limitations based on

(i) the customary and direct dependence on the fish stock or game population by the subsistence user for human consumption as a mainstay of livelihood;

(ii) the proximity of the domicile of the subsistence user to the stock or population; and

(iii) the ability of the subsistence user to obtain food if subsistence use is restricted or eliminated.”

AS 16.05.258(b)(4) (*emphasis added*). Thus, any decision regarding limitations on subsistence king salmon fishing by Tyonek Subdistrict permit holders must be brought before the board of fish. Furthermore, our community is, and has been directly dependent on king salmon harvests from the Cook Inlet for over 10,000 years. This harvest has occurred consistently in the area



directly below the current site of the village which is the area from which we currently engage in the state managed subsistence fishery. The Native Village of Tyonek lacks a grocery store, while the Village maintains a small shop that sells frozen pizzas, chips, and soda, this store is unable to provide for the nutritional needs of the community in the event that king salmon harvests are limited. Accordingly, per AS 16.05.258(b)(4) if any cuts to the fishery are made, fair and equitable opportunity for the residents of the Native Village of Tyonek to fulfill the household quota set in 5 AAC 01.595 must be provided for.

Under state subsistence regulations found at 5 AAC 01.595, each household is allowed to take king salmon up to the allowed quota. How are we supposed to fulfill our quotas and feed our families if we are only allowed a total of three openers? These continued cutbacks on fishing periods do not provide an adequate opportunity to harvest what we are entitled to under the regulations, nor does it provide a fair opportunity to harvest what is required for our food security.

To be clear, the majority of the fish we catch in the Tyonek Subdistrict are not from the Deshka or other river systems. Instead, the king salmon we catch are destined for the Chuitna River, a non-navigable waterway bordering our village which is owned, almost entirely, on one side by our ANCSA Village Corporation, Tyonek Native Corporation, and on the other by the federal government held in trust as Native Allotments for the benefit of individual Tribal Members. We take the management of the Chuitna seriously, we have safeguarded and stewarded that river for the last 10,000 years. The take of fish bound for the Chuitna is sustainable at the levels we have harvested in the past. We plan to continue to harvest these fish into the future.

Let us be additionally clear, the Native Village of Tyonek and the Tyonek Tribal Council is adamantly, directly, and unequivocally opposed to any reductions to the number or duration of subsisting King Salmon fishing opportunities in the Tyonek Subdistrict. Any such reductions infringe on the ability of residents to fill their freezers and smokehouses; they jeopardize the food security of our community and ultimately fail to provide a fair and equitable opportunity for permitholders to fulfill their quotas.

We look forward to the opportunity to work with the Board and the Department to provide a fair and equitable opportunity for our Tribal Members and residents of the Native Village of Tyonek to harvest what is needed to meet the subsistence needs of our community.

 Janelle Baker (Mar 2, 2026 18:37:55 AKST)

Janelle Baker IRA Council Secretary/Treasurer for Robert Stephan Sr. President  
IRA Tribal Council  
Native Village of Tyonek

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Larsen Nebl, and I am a Southeast drift gillnet permit holder based in Ketchikan, Alaska. I operate the F/V Silver Mist.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would drastically affect my yearly income to the point that I may have to step away from something that has been in my family for generations.

We have multiple hatcheries connected to our island, and reducing their production could potentially harm wild runs by weakening the survivability of each species against predators.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Larsen Nebl

**Submitted by:** Nik Nebl

**Community of Residence:** Ketchikan

I oppose 170,171,172

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nicholas Nekeferoff, and I am a Native Alaskan, commercial fisherman, tribal member, subsistence fisherman, and sport fisherman based in Sitka, Alaska. I operate the F/V Garnet.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I am a Southeast Alaska limited entry gillnet permit holder, and I rely heavily on hatchery-produced salmon in the Southeast Alaska region. A reduction or moratorium on hatchery production would greatly affect my family's income stability, job security, business viability, and livelihood.

As a Sitka resident, these reductions would greatly reduce harvest opportunity, reduce community job opportunities, create job instability, and have negative effects on food availability for me and my tribe. There would also be negative impacts to our local economy.

Egg takes are a scientific process, and placing a blanket restriction on an already established process is dangerous and unnecessary.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Jessie Nelson, and I am a commercial fisherman based in Homer, Alaska.

Our family greatly depends on hatchery fish for our livelihood, and has since the inception of the hatchery program. These proposals would devastate the fisheries we depend on for our income.

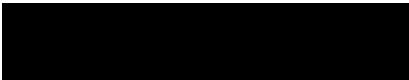
My community has many, many fishermen who participate in these fisheries, live here, and do their boat repairs here. Without hatcheries, fishing pressure on wild stocks would increase, and fishermen would face possible bankruptcy.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Jessie Nelson  
Homer, Alaska





**Submitted by:** Parry Nelson

**Community of Residence:** Kodiak

im in strong support of proposal 167. ive been jigging cod here in kodiak since i got my first boat 15 yrs ago. it is a great open entry fishery that covers a part of the year when not much else is happening fishing wise. unfortunatly cheating has gotten way out of hand in recent years. ive caught several illegagl unmarked groundlines when ive been out jigging and theres currently no way of enforcing it.

---

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Parry Nelson. I am a commercial fisherman and a year-round resident of Kodiak, and I fish aboard the F/V Redline.

If Proposals 170, 171, and 172 are adopted, it would significantly compress the Kodiak seine fleet into the areas I typically fish, increasing congestion and reducing workable opportunity. It would also reduce overall fish volume, which in turn reduces income for tenders, processors, processing workers, and local city/borough tax revenue that depends on a functioning fishery.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Parry Nelson  
Kodiak, Alaska



**Submitted by:** Rob Nelson

**Community of Residence:** Kasilof, Alaska

Madam Chair, Members of the Board,

I am the author of proposal 174 which, if adopted, would Delete subletter (I) under 5AAC 39.260.

This states “During the operation of a purse seine, the propulsion engines of the seine vessel or the skiff assisting the operation, must be running and the vessel must be controlling the configuration of the purse seine.”

This is an unnecessary regulation. In this day and age, what’s the point? The vast majority of the time, the vessel is actively controlling the net, but when fishing is slow or fish are spooky, and don’t want to go into the net, you may just want to just hang on the gear.

Being forced to burn fuel in this situation seems an unnecessary burden.

I also OPPOSE proposals 170 and 171. These seek to reduce permitted egg takes at Alaskas hatcheries.

Fish produced by these hatcheries generate fishing opportunities for commercial, recreational and subsistence users and generate revenue for the State, local communities and local businesses.

Salmon produced by these hatcheries also take fishing pressure off wild stocks.

There are no studies showing compelling evidence of negative effects of hatchery fish on wild stocks.

Alaska hatchery salmon are a drop in the bucket of the fish biomass in the North Pacific.

I hope to get a chance to chat with you all at the meeting, Thank you

**Submitted by:** Thomas Nelson

Crescent Moon Inc

**Community of Residence:** Homer, AK

Member of the Board of Fisheries,

My Name is Thomas Nelson, I am a full-time resident of Homer, AK, and am a PWS commercial fisherman participating in the seine fishery. I am writing to Strongly OPPOSE proposal's 170-171-and 172. All in one way or another attempt to reduce the permitted egg take of the hatcheries within Alaska. This would be very detrimental to many aspects of Alaskan fisheries. The hatcheries provide a steady supply of salmon for the commercial fisheries and processor's, which is key to our livelihood. This would also affect sport, personal use and subsistence fisheries as many fish harvested in these endeavors are hatchery fish. If you dipnet the copper river, catch silvers about anywhere in southcentral, sockeye in Cook Inlet, Main Bay, or Resurrection Bay you have undoubtedly caught hatchery fish. Many places would be exclusively hatchery produced fish. If egg takes are cut for pink and chum salmon the very first programs to go will be the sport related programs as they are all paid by pink and chum harvests, these programs do not pay for themselves. The effects will be far more reaching than the proposers anticipate.

Furthermore, the reasoning behind these proposals is based on flawed logic, and skewed studies with cherry picked data to support conclusions to fit their narrative. There is no scientific evidence that hatchery salmon are detrimental to wild stocks. In fact, there is considerable observational data that suggest otherwise, as well as prominent genetic studies that concluded diversity has remain with hatchery produced fish in the eco system.

In conclusion I would ask the board to vote NO on proposals 170-172.

Thank you, Thomas Nelson      Homer, AK

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Aaron Nevin. I am a commercial fisherman and subsistence user in Kodiak.

Adoption of Proposals 170, 171, and 172 would greatly impact my ability to make a living. There are seasons where the difference between turning a profit or not comes down to hatchery fish that provide stability and opportunity when wild runs are low. The harm these proposals would cause would be significant.

Reduced harvest opportunity would affect my community directly. Less income for fishermen and processors means less money spent at local businesses and fewer job opportunities in Kodiak.


I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Aaron Nevin  
Kodiak, Alaska



PC339

**Submitted by:** Jake Newton

**Community of Residence:** Nikiski

Hi , my name is Jake Newton I am a lifelong Alaskan born in soldotna and commercial fishing since I was a little kid, I've fished in cook inlet my entire life and have watched as we get restricted further and further and lose time and area that we will never get back, commercial fishing is my livelihood and my wife and kids depend on it as do the rest of my family . I would ask that the board please take no action on proposal 186. Thank you

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PC340

**Submitted by:** Melissa Norris

**Community of Residence:** Eagle River

I support proposal 186 to manage Northern Cook Inlet coho on a more sustainable basis. Southcentral Alaska relies on this resource for food security. Many also rely on coho abundance for their livelihood and well being. We need to restore Alaska to the levels our communities need to thrive. Thank board members for your time and commitment to Alaska's sustainability.

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PC340

**Submitted by:** Melissa Norris

**Community of Residence:** Eagle River

I meant to submit an additional comment in full support of restricting trawl under proposals 11, 163, 164 and 165. I am also in favor of restricting hatchery pink salmon and chum salmon release. Wouldn't it be great if you enabled these modifiers and in the coming years we see an improvement in stocks all around? You have the power to make real change. Please help Alaska thrive.

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**North Pacific Fisheries Association**  
 P.O. Box 796 Homer, AK 99603  
 npfahomer@gmail.com // www.npfahomer.com

March 2, 2026

Alaska Department of Fish and Game  
 Board of Fisheries

**RE: OPPOSE Proposals 170, 171, & 172.**

Chairwoman Carlson-Van Dort and Members of the Board of Fisheries,

North Pacific Fisheries Association (NPFA) represents over 60 independent commercial fishermen, their families, and crewmembers, many of whom fish or tender salmon and all of whom benefit from Alaska's hatchery programs and, more importantly, Alaska's wild fisheries.

**NPFA opposes Proposals 170, 171, and 172, which seek unnecessary reductions or limitations on hatchery production.**

Proposal 170 would impose a blanket 25% reduction in pink and chum egg take statewide. This action is not supported by Alaska-specific findings demonstrating that such a reduction is necessary to protect sustained yield. The proposal lacks region or stock-specific causation, productivity modeling, or quantified ocean carrying capacity analysis. A statewide cut would immediately reduce harvest opportunity and impact cost-recovery revenues that fund hatcheries without demonstrated biological benefit.

Proposal 171 seeks to reduce Prince William Sound pink production in response to straying concerns. NPFA agrees straying must be managed conservatively and consistent with Comprehensive Plan standards. However, the proposal presumes egg take reduction is the necessary remedy without demonstrating that production level—rather than operational factors such as release timing or environmental variability—is the primary driver. Corrective action, if warranted, should be adaptive and region specific.

Proposal 172 would impose a moratorium on increases in pink and chum egg take. While framed as precautionary, it establishes an open-ended constraint without defined duration or objective benchmarks. Existing statutory authority and comprehensive Alaska Department of Fish and Game (ADF&G) oversight already provide mechanisms to evaluate and regulate production.

Alaska's hatchery programs operate under the Hatchery Act, the Sustainable Salmon Fisheries Policy (5 AAC 39.222), regional enhancement plans, and detailed ADF&G permitting and monitoring. Structural production cuts or freezes absent Alaska-specific, stock-level evidence would destabilize a program that supports fishermen, communities across Alaska, and shared user access to fish. Continued monitoring and adaptive management remain the most appropriate path forward.

NPFA respectfully urges the Board to reject Proposals 170, 171, and 172.

Sincerely,

Malcolm Milne

President, North Pacific Fisheries Association



**North Pacific Fisheries Association**  
 P.O. Box 796 Homer, AK 99603  
 npfahomer@gmail.com // www.npfahomer.com

March 2, 2026

Alaska Department of Fish and Game  
 Board of Fisheries

**RE: OPPOSE Cook Inlet Drift Proposal 186**

Chairwoman Carlson-Van Dort and Members of the Board of Fisheries,

North Pacific Fisheries Association (NPFA) represents more than 60 independent commercial fishermen, their families, and crewmembers, many of whom participate in the Cook Inlet drift gillnet salmon fishery, most of whom reside on the Kenai Peninsula.

**NPFA opposes Proposal 186**, which would permanently reduce drift gillnet fishing opportunity in Area 1 during mid-July and eliminate it altogether during the latter half of July.

Proposal 186, posed as a conservation proposal, lacks emergent need and instead seeks permanent reallocation of fishing opportunities via strict drift gillnet limits in Area 1, regardless of coho abundance or biology. ACRs exist to address unforeseen conservation or biological issues that arise outside the regular cycle and require prompt Board of Fisheries action. Proposal 186 identifies no stock-of-concern designation, no biological threshold, and no emergent risk that existing management tools are incapable of addressing.

Under Alaska law and Board of Fisheries standards, distinguishing conservation (management measures for maintaining sustained yield) from allocation (harvest distribution among users after conservation) is critical. Although the ACR cited coho conservation concerns, Proposal 186 is allocative. It does not address coho run size, escapement, or stock status. It lacks any conservation objective or explanation of the restrictions' benefits and should tie to measurable biological metrics and adjust with conditions, but *it does not*.

**A regulation that applies identically in weak years and strong years is not conservation-driven; it is allocation by design.** Effective conservation management under Alaska's sustained-yield mandate is adaptive. It relies on in-season data and allows managers to respond to real-time conditions. Proposal 186 removes that flexibility entirely. It provides no in-season management authority and no mechanism to tether restrictions to abundance. Such rigidity is inconsistent with conservation management and further underscores the allocative nature of the proposal.

**Allocative proposals belong in the regular cycle, where competing interests can be evaluated transparently and in context.** Accepting Proposal 186 as an ACR circumvents that process and undermines the open, stakeholder-driven framework that has long defined Alaska's fishery management system and presents a significant burden on stakeholders that must travel to an extra meeting out of cycle, far from home.

At its February meeting, the NPFMC set a Cook Inlet EEZ coho total allowable catch (TAC) of 16,619 fish, reflecting a highly precautionary federal management approach. The Council made clear that this precaution was driven not by a documented conservation concern, but by limitations in available data and federal management structure under the Magnuson–Stevens Act. Proposal 186 would layer severe and permanent State-water restrictions on top of this already constrained federal framework without consideration of cumulative effects or foreseeable effort displacement. The predictable result is increased



Established 1955

## North Pacific Fisheries Association

P.O. Box 796 Homer, AK 99603

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management instability, concentration of effort, and early closures driven by regulatory interaction *rather than* biological necessity. Proposal 186 undermines effective salmon management in Cook Inlet, which depends on coordination and predictability.

Drift gillnet fisheries support Alaska residents, family businesses, seafood processors, and coastal communities throughout Cook Inlet. Permanent allocative restrictions untethered to biological performance unreasonably limit economic opportunity and disproportionately burden these coastal communities without demonstrating a conservation benefit. Such outcomes are not required to maintain sustained yield and should not be imposed through an out-of-cycle process.

**NPFA requests that the Board of Fisheries either reject Proposal 186 or decline to act on it outside the regular cycle and defer consideration to the March 2027 Upper Cook Inlet meeting** consistent with the Board's established standards for allocative proposals.

Thank you for your careful consideration and for your prioritization of open and transparent management of State of Alaska fisheries.

Respectfully,

Malcolm Milne

President, North Pacific Fisheries Association





To: Chair Carlson-Van Dort and Board of Fish Members

From: Northwest Setnetters Association Board of Directors

Re: Opposition to proposals 170-172

Date: 2/28/2026

Thank you for the opportunity to provide comment on proposals 170-172.

The Northwest Setnetters Association represents set-gillnet fishermen from Kodiak's Northwest district. Our members' salmon enhancement tax goes to the Kodiak Regional Aquaculture Association (KRAA), which provides many benefits for the community at large. Proposals 170-172, if passed, would so severely cripple KRAA's operations that they would not be able to support the programs that make a difference on Kodiak Island.

Our association is concerned about KRAA's ability to continue its king salmon rehabilitation efforts, which are critical for set-gillnet fishermen in our area. Currently, set-gillnet fishermen in our district bear the largest burden of lost fishing opportunity due to declining chinook runs. Due to limited chinook escapement, our district is completely shut down for the duration of June, during which the early sockeye run occurs. We cannot move to other areas the way seiners may, or target species besides salmon the way sport fishermen may. We firmly support KRAA's efforts to change the trajectory for Kodiak's chinook runs and are alarmed that these proposals would so deplete KRAA that it would lose its ability to engage in these rehabilitation efforts.

These proposals would also curtail the sport and subsistence opportunities that KRAA provides in some of the rural communities on the island, raising food security concerns. Our association cannot support proposals that would cause such negative impacts throughout the island's communities.

Across the state, hatcheries play an important role in the economics and security of their communities. We urge you to vote no on proposals 170-172.

Sincerely,



Adelia Myrick  
President, Northwest Setnetters Association

**Submitted by:** Lily Noto

**Community of Residence:** California

I support Proposal 170 because reducing hatchery egg take by 25% will prioritize conservation and science-based management. A global

review of peer-reviewed literature evaluating hatchery impacts on wild salmonids found that 83% of studies reported adverse or minimally adverse effects on wild populations, most commonly through

genetic diversity loss, reduced productivity, and ecological competition. With even newer synthesized evidence coming out in 2023-2025, the impact of hatcheries on wild salmon are detrimental. Wild salmon are the backbone of Alaska's ecosystem and economy. Approving this proposal would ensure we protect wild salmon stocks.

I strongly support Proposal 172 because it addresses legitimate concerns about hatchery pink salmon straying into wild salmon streams. The Prince William Sound/Copper River Comprehensive Salmon Plan specifies the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of the

wild-stock escapement over the long term. Though evidence shows the reality, PWS hatchery contributes 22%. This is causing a reduction of genetic variation and a weakened ecosystem. Proposal 172 will help enforce already existing responsibilities that lead to the necessary protection wild salmon populations.

I support 172 because there must be a moratorium in order to engage in time for review and revisions on Alaska's salmon hatcheries. There must be time to consider the current data and create a comprehensive salmon hatchery policy, because currently that does not exist.

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**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**  
 1308 Sawmill Creek Road  
 Sitka, Alaska 99835  
 Office: (907) 747-6850 fax:(907) 747-1470

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February 27, 2026

Alaska Board of Fisheries  
 PO Box 115526  
 Juneau, AK 99811

**Re: Proposal 170, 171 & 172**

Dear Members of the Alaska Board of Fisheries,

The Northern Southeast Regional Aquaculture Association or better known as NSRAA, submits the following comments regarding Proposals 170, 171, and 172. My comments represent our 25-member board, and the hundreds of fishermen they represent.

**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**

This same proposal was just heard in January of 2025 at the Ketchikan SE Region Board of Fish meeting (Proposal 156) and failed to pass. Proposal 170 has now been submitted to the BOF with similar language a total of 12 times since the early 2000's in regions from Southeast to Prince William Sound, to Lower Cook Inlet to Kodiak, and now is proposed for Statewide implementation. Half of these proposals sought a significant reduction of hatchery production by 50% or greater. At the 2025 Ketchikan meeting Proposal 156 was opposed by a broad cross section of SE Alaska comprised of 195 individuals, 11 cities and boroughs in SE, was opposed by 7 tribes, opposed by many involved in the sport/charter industry, opposed by 4 chambers of commerce, opposed by 3 economic development organizations, opposed by 22 organizations directly involved in the fisheries in SE, and lastly, was opposed by 10 Advisory Committees in SE: East Prince of Wales, Elfin Cove, Icy Straits, Juneau Douglas, Ketchikan, Klawock, Pelican, Petersburg, Sitka, and Wrangell.

For over two decades these arbitrary proposals, submitted by the Fairbanks AC or members of the Fairbanks AC, have not been supported by the Board of Fisheries and NSRAA encourages the board to oppose Proposal 170. The current proposal before you is the most recent submission, which takes up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

The Alaska State Legislature had tremendous forethought in 1974 when drafting the Private Nonprofit Hatchery statutes to remediate local depressed salmon stocks. By establishing an array of legislative guardrails to ensure that Alaska did not make the same historic salmon mismanagement mistakes that Washington and Oregon have, salmon enhancement programs in Alaska can and do

operate in alignment with principles that prioritize conservation and protection of wild fish ahead of commercial fisheries supplementation and economic benefit.

The *Comprehensive Salmon Enhancement Plan for Southeast Alaska* continues to reinforce those safeguards today. Statutes such as a Genetics Policy, Fish Health and Disease Policy, avoidance of mixed-stock fisheries, and identification of enhanced fish through marking all ensure hatchery fish are produced in a responsible, ethical fashion that will not impose trophic competition or genetic harm upon wild stocks. Change requests to hatchery permits and Annual Management Plans are rightfully heavily scrutinized by ADFG Divisions of Commercial and Sport Fisheries and the Joint Northern/Southern Regional Planning Teams to ensure wild fish stocks remain protected, and the public maintains the right to participate in the process.

The economic effect of a cut to enhanced salmon production and resultant loss of common property harvest opportunity will unquestionably be significant and felt statewide at every level of the seafood producing sector. Furthermore, this loss will come to commercial salmon permit holders during a period of continued low fish prices and uncertain global markets. Since 1980, the commercial ex-vessel value contributed to the SEAK economy from NSRAA alone exceeds \$372,000,000 and has alleviated harvest pressure off local wild salmon stocks by providing new common property harvest opportunities that otherwise did not exist. This proposal will undoubtedly result in an increase in harvest pressure on wild fish, thereby undermining the objectives of the State of Alaska and the proponents of this proposal to protect wild fish populations.

It should be noted that the theory of SEAK hatchery fish imposing harm to wild-born Interior Alaska salmon runs by way of density-dependent, trophic competition is doubtful, as these two cohorts inhabit different regions of the Bering Sea (BS), western Gulf of Alaska (GOA), and eastern GOA (Larson, et al. 2013). Genetic analysis in Chinook has shown that seasonal migration patterns of SEAK Chinook and chum stocks are distributed across the GOA year-round, while Yukon and western Alaskan Chinook and chum reside in the middle and western (BS). The North Pacific Fishery Management Council (NPFMC) reports that bycatch of SEAK origin Chinook and Pacific Northwest origin chum in the BS pollock fishery of eastern GOA origin chum comprise only 1.4% of Chinook and 18.7% of total chum. (Ianelli and Stram, 2015), indicating a spatially divergent distribution between the two regional aggregates. The blanket argument behind Proposal 170 that SEAK hatchery fish are compromising wild western Alaskan salmon stocks does not consider the trophic competition

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*Larson, Wesley A., et al. 2013. Single-nucleotide polymorphisms reveal distribution and migration of Chinook salmon (*Oncorhynchus tshawytscha*) in the Bering Sea and North Pacific Ocean. Canadian Journal of Fisheries and Aquatic Sciences, vol. 70(1), p. 128–41, <https://doi.org/10.1139/cjfas-2012-0233>.*

*Ianelli, James N. and Stram, D. L. 2015. Estimating impacts of the pollock fishery bycatch on western Alaska Chinook salmon. ICES Journal of Marine Science, vol. 72(4), p. 1159-1172, <https://doi.org/10.1093/icesjms/fsu173>.*

imposed by Russian and Japanese origin, wild and hatchery pink and chum which do spatially overlap in the western GOA and BS. The bycatch data does not support concurrent trophic overlap with SEAK origin enhanced production.

Genetic analysis in Chinook has shown that seasonal migration patterns of SEAK Chinook and chum stocks are distributed across the GOA year-round, while Yukon and western Alaskan Chinook and chum reside in the middle and western BS. The North Pacific Fishery Management Council (NPFMC) reports that bycatch of SEAK origin Chinook and Pacific Northwest origin chum in the BS pollock fishery of eastern GOA origin chum comprise only 1.4% of Chinook and 18.7% of total chum. (Ianelli and Stram, 2015), indicating a spatially divergent distribution between the two regional aggregates. The blanket argument behind Proposal 170 that SEAK hatchery fish are compromising wild western Alaskan salmon stocks does not consider the trophic competition imposed by Russian and Japanese origin, wild and hatchery pink and chum which do spatially overlap in the western GOA and BS. The bycatch data does not support concurrent trophic overlap with SEAK origin enhanced production.

We respectfully request that the BOF **oppose Proposal 170** due to the lack of scientific evidence to support the desired outcome of improving wild salmon stocks, and consequential economic burden to all fishery user groups and coastal Alaskan communities that a 25% reduction in enhancement fish releases would impose.

**Proposal 171- 5 AAC 40. XXX New Regulation - Amend Prince William Sound hatchery permits to reduce pink salmon egg take capacity**

Proposal 171, while differing in argument on why hatchery production should be decreased in Prince William Sound (PWS), this proposal asks to achieve the same result as Proposal 170, a decrease of Alaskan Hatchery production. As with Proposal 170, this proposal does not offer any evidence of harm by hatchery production in PWS, just the presence of hatchery salmon. This proposal seeks reduction in PWS hatchery production to counter undocumented harm on Lower Cook Inlet (LCI) wild pink salmon.

If straying of hatchery produced pink salmon had a negative, deleterious effect upon wild pink salmon production, you would expect this effect to be most prevalent in areas closer to hatchery release sites in PWS. There is no evidence to support this is occurring. PWS has seen the largest wild pink salmon returns in history in the past 10 years. This is after over 40 years of large-scale hatchery production in PWS, equating to over 20 elapsed generations of pink salmon. Additionally, the ongoing Alaska Hatchery Research Project (AHRP) has determined that after more than 40 years of hatchery production there still is regional and local genetic stock differentiation in PWS. The AHRP was created to evaluate what, if any, effects hatchery production has on wild pink salmon in Alaska. This project is nearing completion and is best suited to evaluate concerns with pink salmon straying in LCI.

We respectfully request that the BOF **oppose Proposal 171** due to the lack of scientific evidence to support the desired outcome of improving wild salmon stocks, and consequential economic burden to all fishery user groups and coastal Alaskan communities in PWS that a reduction in enhancement

fish releases would impose.

**Proposal 172- 5 AAC 40.XXX New Regulation - Board generated regulation that places a moratorium on pink and chum hatchery production**

Proposal 172 seeks the BOF to issue a moratorium on increases in pink and chum hatchery production statewide. While not seeking a reduction in production, in contradiction to the same proposers ask in 171, this proposal highlights the error in all three of these anti-hatchery production proposals. The BOF does not possess the regulatory authority over hatchery permitted egg take capacity. That authority lies implicitly within ADFG and the ADFG commissioners' authority. NSRAA strongly encourages the BOF to pay particular attention to on-time comments submitted to the BOF by Ashburn and Mason on behalf of PWSAC and the Alaska Hatchery Operators directly addressing the authority the BOF possesses over fishery enhancement efforts.

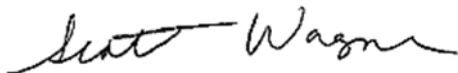
Not only do the Alaska Hatchery Operators believe the board lacks this authority, but ADFG **opposes** Proposals 170, 171, and 172 due to the same reasoning.

We respectfully request that the BOF **oppose Proposal 172** due to the lack of authority over hatchery permitted capacity.

Salmon hatcheries are often portrayed as willfully ignorant toward wild fish welfare and to have a perceived disregard for responsible salmon conservation biology, which is demonstrably untrue. As hatchery operators, we want healthy wild salmon runs and find collateral damage to wild stocks ethically unacceptable, thereby reinforcing our adherence to the best possible science when it comes to broodstock genetics and hatchery management practices. NSRAA is committed to working with ADFG staff to cooperatively manage enhanced fish production that is in alignment with ADFG statutes, regulations, and policies while providing economic opportunities to our SEAK fishing communities.

Based on the aforementioned information, we respectfully request that the **BOF oppose Proposals 170, 171, and 172**. We invite the BOF members to visit our facilities to see firsthand our dedication to upholding a high degree of scientific rigor, stewardship of natural resources, and the added economic value that supports our local fishing communities.

Sincerely,



General Manager



**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

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 Sitka, Alaska 99835  
 Office: (907) 747-6850 fax:(907) 747-1470

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February 28<sup>th</sup>, 2026

Alaska Board of Fisheries  
 PO Box 115526  
 Juneau, AK 99811

**Re: Proposals 170, 171, 172**

Dear Members of the Alaska Board of Fisheries,

The following comments underscore the Northern Southeast Regional Aquaculture's (NSRAA) commitment to scientific integrity, wild fish protection, and sustainable fisheries enhancement, as well as our collaborative work with resource managers to ensure our practices remain fully aligned with regulations designed to safeguard wild salmon stocks. **We respectfully request that the BOF oppose Proposals 170, 171, and 172 as there is insufficient scientific evidence to demonstrate that these measures would improve wild salmon stocks, and the claims that hatchery fish harm wild fish remain unsubstantiated.**

To support our Southeast Alaska fisheries enhancement projects, NSRAA, based in Sitka, operates a comprehensive research and evaluation program that serves as a cornerstone of our operations. This program is responsible for collecting local fisheries contribution and added-value estimates, conducting research into optimizing fish survival, and developing new methodologies for minimizing the potential for interactions with wild fish populations at every life stage.

This program is founded on a thorough otolith-marking and coded-wire tagging program for all species, annually sampling over 12,000 chum from local Southeast fisheries. Otolith-marking functions as a biological tag that identifies the age, release location, and, when applicable, experimental treatment, with 100% of NSRAA-produced fish receiving a mark. This work is critical to upholding NSRAA's core values of responsible resource stewardship and maintaining a "do no harm" ethos, as well as for our ability to make decisions that prioritize fish welfare and ultimately program success. This essential work would not be possible without support from chum cost recovery and Salmon Enhancement Tax revenue.

Support new interagency fisheries management technologies

NSRAA maintains a unique, one-of-a-kind long-term dataset on returning adult chum in northern Southeast Alaska through our otolith-marking program. By collecting both otoliths and scales paired from the same fish, in 2024 and 2025 NSRAA was able to support an interagency working group –



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including the ADFG Mark, Tag and Age Lab, NOAA's Alaska Fisheries Science Center, Fisheries and Oceans Canada (DFO), and the Pacific States Marine Fisheries Commission – in the development of new machine learning technology for aging chum salmon scales. Scales from escapement and bycatch surveys are typically aged by experienced human readers, making the process slow and expensive. NSRAA's library of thousands of paired otolith-scale samples served as calibration, or absolute known-age, for developing this technology by eliminating the potential for human reader error and demonstrably improved the model accuracy. This collaboration represents one example of the meaningful contributions and broad partnerships that NSRAA's research brings to the Alaska fisheries management community.

Ongoing monitoring of Crawfish Inlet hatchery chum

In response to growing concerns about the potential impacts of hatchery and wild chum salmon interactions, and to support state resource managers in obtaining accurate wild stock escapement estimates, NSRAA has conducted extensive self-funded research since 2023 to better understand hatchery fish behavior in Crawfish and West Crawfish Inlet. These efforts include multi-year studies (2023–2025) of post-release outmigration patterns of hatchery chum fry, chum spawner surveys to quantify hatchery-origin presence and estimate wild stock escapement, water quality analyses within migration corridors to assess potential effects on homing and imprinting, and evaluations of tidal current dynamics that may influence juvenile outmigration pathways.

Although the West Crawfish Inlet summer-run chum stock was removed by ADFG as an index population in 2024 from the Northern Southeast Outside (NSEO) aggregate, NSRAA is continuing to study the presence and assess the ecological implications of fall-run hatchery chum in West Crawfish Inlet. In 2025, the NSEO summer-run chum management group was designated as a Stock of Concern following several years of poor returns and under-escapement, resulting in increasing public attention on this hatchery program and its potential for interaction with wild stocks. Statistical analyses have shown that wild fish returns for the West Crawfish Inlet index were not significantly different from the other eight index populations in the NSEO management unit. In 2025 the ADFG Commissioner applied a precautionary approach by reducing the permitted number of Crawfish Inlet hatchery chum released by 25%.

NSRAA has partnered with ADFG biologists and biometric staff to implement a multi-year spawner survey program designed to quantify the proportion of hatchery-origin fish, estimate escapement, and document age class composition of the wild stock. Age-at-maturity data are not currently collected by the state for the West Crawfish Inlet system; however, NSRAA's surveys now provide an opportunity to generate valuable insight into survival variability among brood years within the wild return. Spawner surveys were independently designed and conducted by NSRAA in 2023 and 2024





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using a structured and systematic sampling approach. In 2025, the study design was further refined in coordination with ADFG to enhance statistical robustness and ensure consistency with long-term management objectives. This collaborative effort between NSRAA and ADFG resource managers reflects a shared commitment to transparency, sound science, and adaptive management. Spawner composition monitoring in West Crawfish Inlet is intended to continue through at least return year 2029 to inform future management decisions.

Integrating mariculture and salmon aquaculture to mitigate straying

In 2025 NSRAA partnered with the University of Alaska and the Sitka Sound Science Center to undertake a 5-year project aimed to develop a practical, science-based tool for modulating salmon homing behavior with the goal of mitigating hatchery straying and improving homing accuracy. The foundational concepts draw from established salmon olfactory research exploring how dissolved free amino acids (DFAAs) influence juvenile imprinting and adult fish return fidelity. This study integrates mariculture and salmon aquaculture by cultivating kelp to produce a distinct DFAA signature that juvenile hatchery salmon can imprint upon during known critical imprinting life stages. Through systematic otolith sampling and spawner surveys, the project will evaluate whether this kelp-derived olfactory cue improves homing performance and reduces unintended straying into nearby watersheds.

The goal of this project is to develop new techniques and methodology that could be applied as a straying mitigation tool for hatchery programs statewide. This project has garnered strong interest and support from researchers across the state. The study design emphasizes repeatable, scalable protocols so that results can inform long-term management and be transferable beyond a single pilot facility.

Importantly, this effort represents a form of Integrated Multitrophic Aquaculture (IMTA), which is widely recognized as one of the most environmentally responsible approaches to propagating fish in seawater net pens and is considered a best management practice in sustainable aquaculture. By pairing salmon culture with kelp cultivation, the project not only serves as a tool for hatchery managers to minimize potential impacts, but also as a means of exploring ecological benefits such as improved water quality and habitat complexity, while creating economic opportunity for Alaska's growing mariculture sector. If successful, the methodology developed through this work has the potential for statewide application across Alaska's private nonprofit hatchery system, providing fisheries managers and operators with an additional tool to support responsible enhancement, improve hatchery-wild stock separation, and sustain both fishing and mariculture communities.

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Contrary to some perceptions, salmon hatcheries are deeply committed to understanding and minimizing the potential ecological impacts of our operations, and to supporting the protection of wild fish populations. NSRAA remains dedicated to upholding the highest scientific standards and working collaboratively with ADFG staff to manage enhanced fish production in full alignment with ADFG statutes, regulations, and policies, while continuing to provide meaningful economic opportunities for Southeast fishing communities. In light of the information above, we respectfully urge the BOF to **oppose Proposals 170, 171, and 172.**

Sincerely,

A handwritten signature in black ink that reads 'Taylor Scott'.

Taylor Scott  
NSRAA Hatchery Research Biologist

**Board of Fisheries**

October 15-16, 2018

Work Session Anchorage, Alaska

Dear Chairman Jensen and Board of Fish Members:

In the interest of understanding the complex topic of Ocean Carrying Capacity (OCC) this document written by two career fisheries research scientists is presented.

**High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate**

**Alex Wertheimer, NOAA Fisheries Research Biologist (retired)<sup>1</sup>  
Fishheads Technical Services**

**William Heard, NOAA Fisheries Research Biologist (retired)<sup>2</sup>**

**EXECUTIVE SUMMARY**

The abundance and biomass of wild and hatchery pink, sockeye, and chum salmon in the North Pacific Ocean has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series. The high biomass has been remarkably consistent from 1990-2015. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance. The high sustained abundance and biomass is driven in no small part by historically high abundance of Alaska salmon, and corresponds with the renaissance of Alaska salmon fisheries from their nadir in the 1970s. Statewide commercial catches of salmon were just 22 million fish in 1973; for 1990-2015, statewide catches have averaged 177 million salmon, an eight-fold increase.

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood; (3) the elimination of high seas drift-net fisheries; (4) production from large-scale hatchery programs designed and managed to supplement natural production; and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean. Habitat, management, and enhancement set and maintain the productive capacity that responds to marine environmental conditions: ocean “carrying capacity”.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms. Ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Over the past few decades, conditions in the North Pacific Ocean have

been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions. Marine conditions vary geographically and temporally within a given year, interannually, and in the context of oceanographic regimes favorable or unfavorable to salmon production.

There are concerns that the high abundance in the North Pacific Ocean, coupled with high variability in stock performances, indicate that carrying capacity is being exceeded, and that competitive interactions are negatively affecting growth and survival. These concerns have been raised for over 20 years. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon).

A proposed mechanism for negative impacts of high abundance of salmon in the ocean is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass. In this scenario, this “trophic cascade” and alteration of food webs then negatively impacts other species, including coho and Chinook salmon. The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. However, assessments of nektonic trophic structure in the Gulf of Alaska and the western North Pacific Ocean indicate that salmon have low to moderate impacts on oceanic food webs, and they respond to, rather than control, changes in ocean productivity.

Pink salmon have been identified as a keystone predator restructuring oceanic food webs to the detriment of other species. Four lines of evidence call this conclusion into question. First, Russian researchers report that in extensive ocean research programs, they have found typically no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop. Second, high numbers of pink salmon in the North Pacific Ocean have been associated with record run sizes and continued sustained biomass of salmon, rather than a reversal in these trends when pink salmon abundance increased. Third, pink salmon have shown the greatest variation in abundance among Alaska salmon, especially in response to anomalous ocean conditions. Thus rather than restructuring the food webs, they appear to be the most sensitive to changes in marine conditions. Finally, the high predation pressure of pink salmon in the context of epipelagic food webs is justified because other species, especially chum and sockeye salmon, switch to other, poorer quality prey items when pink salmon are abundant. However, the obvious implication is that these other species will “switch back” to the prey with higher nutritional value when pink salmon are at lower levels of abundance. Because chum and sockeye salmon comprise almost 80% of the oceanic biomass of salmon, salmon predation pressure on the “high value” prey remains relatively constant.

Effects of pink salmon abundance are often used as a proxy for deleterious effects of large-scale enhancement in general. In fact, while pink salmon are the most numerous of the salmon species in the North Pacific Ocean, wild stocks of pink salmon contribute some 85% of the overall abundance.

Density dependent interactions have been identified within and between species of salmon. These interactions have been observed during both periods of low and high abundance. Changes in size, survival and age at maturity have been attributed to these interactions. Despite the existence of

competitive interactions in the marine environment, high productivity of Alaska salmon has persisted during this period of high abundance. In general, size declines of pink and chum salmon occurred prior to the 1977 regime shift, and thus are associated with poorer ocean conditions rather than ocean abundance of salmon, and sockeye salmon size has been stable over the past 60+ years.

There is also concern that the high ocean abundance of the big three (pink, chum, and sockeye salmon) negatively impact coho and Chinook salmon in Alaska. For coho salmon, size declines in Southeast Alaska have been linked to pink salmon abundance in the Gulf of Alaska, while in Canada recent size increases in coho salmon have been positively associated with the combined biomass of pinks, chums, and sockeye salmon. The high correlation of run strength between coho and pink salmon in Southeast Alaska is strong evidence that their abundance is driven by similar overall response to shared marine conditions. Density-dependent mechanism other than competition may also play a role in pink salmon/coho salmon dynamics. These include such as predator sheltering of coho salmon juveniles by the more abundant pink salmon juveniles (decreasing predation on coho juveniles), predator aggregation (increasing predation on coho juveniles), and direct predation of coho juveniles and adults on pink salmon juveniles.

Chinook salmon stocks in Alaska have been depressed in recent years due to reduced marine survival, and have declined in size at age for older fish, and age at maturity. These changes are not likely driven by the high abundance of salmon in oceanic habitats. Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. Size of Chinook salmon at ocean age 2 has not declined, indicating no density-dependent effect on growth through the first two years at sea. Size declines at older ages are more consistent with selective removal of older, larger fish.

Survival declines of Chinook salmon occurred well into the period of high ocean biomass. There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea. Changes in the North Pacific ecosystem, such as increased killer whale predation, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

Favorable ocean conditions rather than density-dependent interactions seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon, with large releases of hatchery fish putting wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? We conclude the latter, because there is empirical evidence that large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

## Introduction

The Alaska Board of Fisheries (BOF) was recently petitioned to hold an emergency meeting asking the BOF to amend actions taken in Permit Alteration Requests (PARs) made by the Prince William Sound (PWS) Regional Planning Team and deny the increase in the number of pink salmon eggs taken in 2018 by 20 million eggs. One of the rationales the petitioners used for rescinding the PAR was "... great concern over the biological impacts associated with continued release of very large numbers of hatchery salmon into the North Pacific Ocean, including the Bering Sea and the Gulf of Alaska." To support this concern, the petitioners provided references to record high abundance and biomass of salmon in the North Pacific, as well as possible density-dependent effects of pink salmon on the trophic structure in the North Pacific Ocean and intra-specific and interspecific competition of pink salmon with other species of salmon and seabirds.

The BOF held the emergency meeting on July 17, 2018, and denied the request for rescinding the PAR. The BOF determined there was no need for such an emergency action, and deferred further consideration to the review of the State's salmon enhancement program scheduled for the October 2018 work session. The intention of that review is for members of the BOF to educate themselves about the program and understand the science the enhancement program is predicated on and the current scientific evaluation.

This paper provides a brief, broad overview of the issue of record abundance and biomass of Pacific salmon and the implications for the status of Alaska salmon. We present this overview in six sections. The first is a review of the recent information on abundance of salmon in the North Pacific. The second is an examination of trends in harvest of Alaska salmon, including enhanced production. The third is a discussion of oceanographic conditions and the concept of "carrying capacity" for salmon in the North Pacific. The fourth is a perspective on the relative role of salmon as a component of the North Pacific ecosystem. The fifth looks at intra- and interspecific competition and density dependence among salmon species, and its possible impacts on growth and abundance. The sixth section summarizes our conclusions from this overview.

### I. High Abundance and Biomass of Salmon in the North Pacific Ocean

In a recent paper, Ruggerone and Irvine (2018) published an excellent compendium of the available data on numbers and biomass of pink, chum, and sockeye salmon in the North Pacific Ocean over the time period 1925 through 2015. The authors have compiled diverse data sources of harvest, harvest rates, and escapement. They have used reasonable approaches to estimating total salmon escapements by species by region, and to estimate hatchery and wild origins.

They found that the abundance and biomass of pink, sockeye, and chum salmon has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series, averaging 665 million adult salmon each year ( $1.32 \times$  million metric tons) during 1990–2015 (Figure 1). During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20%, 35%) and sockeye salmon (13%, 17%). When immature salmon biomass was included in the biomass estimates, biomass was dominated by chum salmon (60% of the combined biomass of all three species),

followed by pink salmon (22%) and sockeye salmon (18%).

The high biomass has been remarkably consistent over the 1990-2015 time period. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance.

Alaska produced approximately 39% of all pink salmon, 22% of chum Salmon, and 69% of sockeye salmon, while Japan and Russia produced most of the remainder. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin. Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Salmon abundance in large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea are dominated by hatchery salmon. During 1990–2015, hatchery salmon represented approximately 40% of the total biomass of adult and immature salmon in the ocean.

In the context of concern for the impacts of hatchery fish on wild salmon and the North Pacific ecosystem, we reiterate three facts about pink salmon noted above. Pink salmon are the most abundant of the species, have the greatest temporal variability in abundance, and are mostly (85%) wild origin (Ruggerone and Irvine 2018). As we will discuss below, the high variability of pink salmon and differences in abundance between odd-year and even-year lines is often used to examine competitive interactions and ecosystem level impacts of salmon in the North Pacific. At the basin-scale, to the extent that such effects may occur, effects of pink salmon are predominately from wild-stock populations rather than from enhanced fish.

## II. Trends in Harvest of Alaska Salmon

The high sustained abundance and biomass in the North Pacific Ocean reported by Ruggerone and Irvine (2018) is driven in no small part by historically high abundance of Alaska salmon. It is instructive to put the current levels of salmon harvest into perspective of the 115 year time series of Alaska commercial salmon harvests (Figure 2), to recognize the extent of recovery and extraordinary recent productivity of Alaska salmon. In the early 1970's, Alaska salmon harvests were at their nadir, with statewide catches of all species averaging just 22 million fish in 1973 and 1974 (Figure 2). In the “good old days” of the 1930s, catches sometimes exceeded 100 million. The State of Alaska initiated a number of management actions to address the decline and rebuild production (Clark et al. 2006), with a goal of once again reaching harvests of 100 million salmon. In 1971, the Alaska Legislature established the Division of Fisheries Rehabilitation Enhancement and Development (FRED) within the Alaska Department of Fish and Game (ADF&G) for hatchery development. In 1972, Alaska voters approved an amendment to the state Constitution (Article 8, section 15), providing for an exemption to the “no exclusive right of fishery” clause, enabling limited entry to Alaska’s state fisheries and allowing harvest of salmon for broodstock and cost recovery for hatcheries. In 1974, the Alaska Legislature expanded the hatchery program, authorizing private nonprofit (PNP) corporations to operate salmon hatcheries.

Alaska's modern salmon hatchery system started in the 1970s and grew out of depressed fisheries that reached record low harvest levels. At the same time a century old Japanese salmon hatchery system was undergoing dramatic improvements in performance with record high marine survivals of young salmon, increased releases of up to 2 billion juveniles per year, and returns of adult chum salmon ranging from

40 to 60 million fish annually (Kobayashi 1980). These impressive results caught the attention of officials and scientists developing Alaska salmon hatchery program.

Exchanges between Japanese and Alaska scientists, fishermen, and industry helped forge the enhancement strategies and policies in Alaska, resulting in similarities in the two hatchery programs. Similarities include hatcheries operated by private fishermen groups where salmon catches are taxed under a user-pay system to help defray cost of hatchery operations, a focus mostly on pink or chum salmon production, and extensive short-term rearing of pink and chums salmon fry to improve marine survival. However, as reviewed by Heard (2011), there also are significant differences between salmon fisheries, policies, and hatchery operations in the two countries. Commercial salmon fisheries in Japan have been largely dependent on hatcheries while development of hatcheries in Alaska focused on fisheries based on a careful balance between wild and hatchery production (McGee 2004). Some important differences in the two systems include locating Alaska hatcheries on non-anadromous water sources and not on important wild stock river systems, careful selection of brood stocks within a region and restricting use of hatchery brood stocks to specific geographic areas.

Alaska salmon harvests recovered rapidly in the second half of the 1970s, and exceeded 100 million fish by 1980 (Figure 2). With the exception of 1986 (96 million), the statewide catch has been over 100 million salmon annually since 1980. For 1990-2015, harvest has averaged 177 million salmon. After 1980, hatchery production started making up an increasing portion of the harvest. In the last decade (2008-2017), hatchery salmon have composed about 33% of the total commercial harvest, averaging 67 million fish annually (Stopha 2018).

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood (Eggers 1992, Clark et al. 2006); (3) the elimination of high seas drift-net fisheries (Clark et al. 2006); (4) production from large-scale hatchery programs designed and managed to supplement natural production (McGee 2004, Stopha 2018); and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean.

### III. Ocean Conditions and Carrying Capacity

*“Trying to define ocean carrying capacity is like trying to catch a moonbeam in a jar”. O. Gritsenko, VINRO, Moscow. Member, NPAFC Committee on Scientific Research and Statistics.*

The recovery of Alaska salmon and the record abundances throughout the North Pacific have been repeatedly linked to changes in ocean conditions characterized as the 1977 regime shift. Warming ocean conditions resulted in striking increases in primary and secondary production (Brodeur and Ware 1992). These changes in temperature and lower-trophic level production were associated with profound changes in species composition of fish and crustaceans (Anderson and Piatt 1999). Salmon as a group benefitted (and are an important component of) these ecosystem level changes, with the dramatic increases in abundance observed around the Pacific rim. The importance of the marine ecosystem to the abundance trends is emphasized by the success of large-scale enhancement systems in both Alaska and



Japan concurrent with the high production of wild stocks from Alaska and Russia. Wild stocks are responding to the effects of climate on both freshwater and marine ecosystems, while variation in hatchery returns for a given level of production is driven entirely by the marine conditions encountered.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms (Farley et al. 2018). For salmon in the ocean, feeding and survival conditions are defined by a complex of physical and biological factors, involving both bottom-up (prey) and top-down (predators) processes (Radchenko et al. 2018). These are dynamic processes, resulting in annual variability in salmon production in the marine environment. The ocean conditions driving these processes vary over both short and long time periods, so that annual variability occurs in the context of “regimes” that can be favorable or unfavorable to salmon (Beamish et al. 1999,2004; Shuntov et al. 2017; Radchenko 2018).

Over the past few decades, “carrying capacity” conditions in the North Pacific Ocean have been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, responses of stocks of Pacific salmon have not been uniform during this period, and extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions, and not a result of a homogeneous ocean carrying capacity (Heard and Wertheimer 2012).

Marine survival of Pacific salmon is more correlated between neighboring populations than with more distant ones (Mueter et al. 2005; Pyper et al. 2005; Sharma 2013), emphasizing the importance of local and regional conditions. The first few months at sea is the period of highest mortality per day for juvenile salmon in the marine environment (Heard 1991; Quinn 2005; Farley et al. 2007, 2018). Variability in mortality during this period can be large, and can be the major driver of year-class strength. An extreme example is the returns of Fraser River sockeye salmon in 2009 and 2010. In 2009, only 1.5 million fish returned, the lowest return since 1947; in 2010, 29 million fish returned, the highest number since 1913. Conditions during the early marine period are considered the primary factor affecting these changes in survival of Fraser River sockeye salmon (Beamish et al. 2012).

Salmon surviving the early marine period are exposed to continued mortality, albeit at a lower rate (Quinn 2005). The first winter at sea has been posited as a critical time period for determining year class strength (Beamish et al. 2004; Moss 2005). Older immature and maturing salmon have much lower mortality rates (Ricker 1976), but these extend over a longer period of time, from 1 year for pink salmon to 5 years for Chinook salmon. Forecasting approaches using juvenile salmon abundance index to predict returns (Wertheimer et al 2017; Murphy et al. 2017) assume that recruitment through the early marine stage has established year-class strength, and that subsequent mortality does not vary substantially from year-to-year. However, Radchenko (2018) reports that cumulative ocean mortality can vary 1.5-2 times. These ocean effects on survival can result in large deviations, positive and negative, from forecasts from juvenile salmon indexes (Figure 3). For 2006, the forecast for Southeast Alaska pink salmon harvest was 35 million fish; the actual harvest was 11 million fish, less than one third of the forecast. In contrast, the pink salmon forecast for 2013 was 53.8 M fish, but the forecast was 43% lower than the actual harvest of 94.7 million fish, the largest harvest since catch records were recorded dating back to 1900 (Figure 3, Figure 4).

These results illustrate that variations in marine survival between different local or regional areas occur in the context of larger basin-scale climatic influences on overall production levels of pink and chum salmon in the GOA. Prevailing basin-scale conditions likely strongly influence environmental factors that favor a higher or lower range or level of potential survival for juvenile salmon from different regions.

The “carrying capacity” encountered by a salmon population is a cumulative effect encompassing different life-history phases. The conditions encountered by the salmon will depend on their geographic origin and their ocean migration patterns, which differ by species and stocks. The ocean is a dynamic environment, with substantial variability throughout the North Pacific basin. In 2013, “carrying capacity” for pink salmon in the Gulf of Alaska (GOA) was high, with strong returns throughout the GOA. Returns in both Southeast Alaska and PWS were at record levels. In contrast, in 2015 pink salmon again returned to PWS in record numbers, while returns in Southeast Alaska were below the 1995-2015 average and below forecasts from juvenile salmon indexes, demonstrative of the regional nature of the response of pink salmon stocks to ocean conditions (nearshore and oceanic).

While the general warming in the North Pacific Ocean has been a feature of the high productivity for salmon (Brodeur and Ware 1992; Mantua et al. 1997; Farley et al. 2018), ocean warming events associated with climate change are occurring with more frequency, often with detrimental impacts on salmon (McKinnell 2017). Recent ocean warming events are associated with the decline of the even-year pink salmon in Southeast Alaska. From 1960 through 2005, there was no clear dominance of even or odd year lines of pink salmon in Southeast Alaska (Figure 4). In the summer of 2005, juvenile pink salmon from SEAK encountered anomalous warm conditions in the Gulf of Alaska (Figure 5). These ocean conditions were associated with the occurrence of neretic fish and invertebrates characteristic of more southern locales, including Humboldt squid, blue shark, Pacific sardine, and pomfret (Wing 2006). The resultant 2006 return was, as noted above, only one-third of forecast, and the lowest since 1988. Even year pink salmon appeared to be recovering relative to the 2006 return, attaining a harvest of 37 million in 2014.

In the winter of 2014/2015, another marine heatwave, aka the warm blob, reached the eastern GOA (DiLorenzo and Mantua 2016). The 2014-brood pink salmon that entered the GOA in 2015 again had poorer than expected survival, attaining only half of the forecast in 2016 (Figure 3). Poor pink salmon returns occurred throughout the Gulf of Alaska in 2016, resulting in a Federal disaster declaration for the fishery. The broad nature of the pink salmon run failure is indicative of shared ocean effects. However, regional and local variability were also apparent. In Southeast Alaska, harvests of pink salmon in the northern area were 20% of the recent 10-year average, whereas in the southern area harvest was 80% of the recent 10-year average. In PWS, much of the catch was supported by fish from Solomon Gulch Hatchery, which was still 50% below forecasts based on average marine survivals. Marine survivals were poorer yet for pink salmon from Prince William Sound Aquaculture Association hatcheries, where returns were less than 20% of forecast (Russell et al. 2017).

The 2005 and 2015 ocean heat waves thus had a broad-scale impact on the carrying capacity for pink salmon in the Gulf of Alaska, with 2015 having a more pervasive impact among regions. Both wild and hatchery fish were affected; the return to SEAK is predominately (> 95%) wild, and the hatchery return

to PWS was the lowest since 1993.

It is noteworthy that despite the poor returns of pink salmon, generally the most abundant species in the Alaska harvest, statewide harvest in 2016 was still above 100 million salmon (Figure 2). Variability in abundance numbers throughout the North Pacific reflects high variability in pink salmon, which appear to be the most sensitive salmon species to annual changes in ocean conditions because of their lack of multiple year-classes at sea.

Ruggerone and Irvine (2018) raised the concern that the high abundance of salmon coupled with variability in stock performances indicates that carrying capacity of the North Pacific Ocean for salmon has been reached or exceeded. This is not the first time such concerns have been raised. Various authors over the past 20 years have posited that high abundance of pink, sockeye, and hatchery chum salmon may have exceeded carrying capacity and be negatively affecting or constraining salmon production (e.g., Peterman et al. 1998; Ruggerone et al. 2003; Davis (2003); Sinyakov (2005, cited in Shuntov et al. 2017). In spite of these concerns, abundance and biomass have continued to be high, reaching record levels in recent years (Figure 1).

As Shuntov et al. (2017) noted, ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon). The sky has not yet fallen. This is not to say that the high abundance will persist indefinitely. The shock of the marine heat waves of 2004/2005 and 2014/2015 to Alaska pink salmon demonstrates that carrying capacity can vary within a productive regime, and reminds us that the status of the current production regime is vulnerable to both gradual and abrupt changes driven by a warming climate. Continued warming could result in contraction of the range of Pacific salmon in the North Pacific Ocean (Welch et al. 1998).

#### **IV. Trophic Position of Salmon in the North Pacific Ecosystem**

A major concern over the high abundance of salmon is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass (Ruggerone and Irvine 2018; Batten et al., in press). This “trophic cascade” and alteration of the food web has been linked to decline in size and abundance of Alaska Chinook salmon and coho salmon (Ruggerone and Irvine 2018; Shaul and Geiger 2016); growth and diet of salmon (Davis 2003); and declines in seabird nesting success and survival (Springer and Van Vliet 2014; Springer et al. 2018).

Dominance of oceanic food webs by salmon is not consistent with the abundance and biomass of salmon relative to other components of the North Pacific ecosystem, including competitors and prey fields. 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. Biomass of salmon subsequently increased to the current levels of 4-5 million t, representing 4-8% of total nektonic biomass during the current period of high abundance. During this period, the biomass of

the two most abundant fish species within their ranges in the North Pacific, walleye pollock (*Theragra chalcogramma*) and Japanese pilchard (*Sardinops melanostictus*), reached 50 million t each.

In the epipelagic layer, Shuntov et al. (2017) estimated that the mean annual food consumption (plankton and small nekton) by the nektonic fauna varied within 210.4–327.3 million t; in the 0–1000 m layer it ranged from 389.0 to 516.0 million t. The amount of food consumed by salmon was 4–8 million t. The proportion of total nekton ration consumed by salmon in the epipelagic layer was 1% - 15%, depending on oceanic area (Figure 6).

This view of low to moderate impact on epipelagic food webs is consistent with mass-balance modeling of North Pacific ecosystems by Pauley et al. (1996). Pacific salmon and steelhead were estimated to make up 4.6% of the epipelagic fish biomass in the Alaska gyre. If squid are including as competitive nekton for zooplankton production, Pacific salmon made up 3.4% of the nektonic biomass. Estimated salmon biomass was < 1% of the estimated zooplankton biomass.

Similarly, the impacts of juvenile salmon feeding during early marine residency on zooplankton has been found to be relatively low. As noted above, the early marine residency is a period of high and variable mortality which may determine year class strength. Given more limited areal habitat than the coastal zone and ocean basin, this period may represent a potential bottleneck for survival. Orsi et al. (2004) used a bioenergetics model to examine consumption of zooplankton by hatchery and wild chum salmon in Icy Strait, Southeast Alaska. They found that juvenile chum salmon consumed only 0.05% of the zooplankton/km<sup>2</sup> in the upper 20-m of the water column, and 0.005% for the integrated water column to 200 m in June and July in 2001. Because juvenile salmon are typically in the upper water column, total standing crop of zooplankton is not likely to be available as forage on a daily basis, but does represent a source for zooplankton abundance in the surface layer through vertical diel migrations. The percentage of available prey consumed by juvenile salmon in the neritic habitat of Icy Strait was less than 0.05% of the available standing stock. Low consumption estimates were also estimated by several other studies. Karpenko (2002) reported that juvenile chum salmon consumed between 0.1 and 1.1% of the total stock of zooplankton in the upper 10 m of Karaginskii Bay, Kamchatka from June to August over a 5-year period. Cooney (1993) estimated juvenile salmon in PWS consumed 0.8–3.2% of the total herbivore production and 3.0–10.0% of the macrozooplankton production. Boldt and Haldorson (2002) reported that juvenile pink salmon near PWS could consume 15–19% of preferred prey taxa such as large calanoid copepods and amphipods if the available standing crop was fixed over a 10-day period; however, on a daily basis, consumption of no taxon exceeded 2% of the standing stock.

Pink salmon have been identified by some authors as the salmon species most affecting oceanic food webs (Ruggerone and Irvine 2018). Surface layer zooplankton indexes have been associated with differences in abundances of odd- and even-year pink salmon stocks (Batten et al. in press). However, there was no directed fish sampling or monitoring of zooplankton below the surface layer (7.5 m) in Batten et al.'s study. Radchenko et al. (2018) reviews studies showing that “as a rule, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop.”

A conceptual problem to assigning plankton depletion to pink salmon feeding is prey-switching by salmon species. Pink, chum, and sockeye salmon have substantial overlap in their diets, and the latter two species have been shown to switch to other, “lower-quality” prey when pink salmon are abundant

(e.g., Davis 2003). These changes in feeding habit are often used to support the concept of density-dependent interactions with pink salmon and their congeners, e.g., Ruggerone and Connors (2015). However, if other species switch prey in response to high pink salmon abundance, they certainly would switch back to the “higher value” prey when pinks are not as abundant. Chum and sockeye salmon make up on average 78% of the biomass of these three species. As a result, there is more of a constant prey demand among this feeding guild in spite of the high variability in pink salmon abundance in the North Pacific. Rather than shaping the ocean food web, pink salmon appear to be most sensitive to interannual changes in oceanic conditions, resulting in high variability in their numbers, both temporally and geographically.

Competition among species may also be minimized by the distribution of salmon in oceanic habitats. Unlike the schooling behavior characteristic of juvenile salmon and maturing salmon in nearshore and coastal areas, salmon at sea are widely dispersed (Shuntov 2017). This behavior reduces competitive interactions and makes their feeding, growth, and survival in the ocean more density-independent.

The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. Four to five million tons of biomass is not a trivial amount. Of this 40% is hatchery origin, primarily chum salmon. Approximately 5 billion hatchery juveniles are released into the North Pacific annually (Figure 7). However, the North Pacific Ocean is a large marine ecosystem, and the numbers are not overwhelming when put into context of total nekton and forage bases. Not all nektonic prey is available to salmon due to depth distribution; Ayedin (2000) concluded local depletion of prey by salmon can occur as salmon school density increases, even if prey is not depleted over large ocean areas. This is an important point in understanding regional differences in changes in size at return.

The sustained high marine abundances of both natural- and hatchery-origin salmon over the past 25 years indicates that the trophic structure has not been altered in some way that inhibits salmon productivity. We agree with the conclusion of Shuntov et al. (2017): “... the role of salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species.”

## V. Competition and density dependence versus density independent responses

An intuitive concern with the high abundance of salmon in the context of ocean carrying capacity is that density-dependent competition for limited prey resources may affect growth and survival of salmon populations. Pink, chum, and sockeye salmon have substantial overlap in their diets (Davis 2003, Brodeur et al. 2007) and the latter two species have been shown to switch to other, “lower-quality” prey when pink salmon are abundant (e.g., Davis 2003). High abundance of pink salmon in the Gulf Alaska has been associated with growth and size at return of chum salmon, sockeye salmon, coho salmon, Chinook salmon, and pink salmon themselves (e.g., Agler et al. 2011; Jeffrey et al. 2017; Ruggerone et al. 2003, 2018; Shaul and Geiger 2017; Wertheimer et al. 2004a). Reduced growth can result in lower size-at-age, shifts in age at maturity for species spending multiple years at sea, and reduced fecundity, which can affect productivity of salmon populations. Ruggerone et al. (2003) ascribed large reductions

in marine survival of Bristol Bay sockeye salmon to the impact of Asian pink salmon on the sockeye salmon growth at sea. The concern for density-dependent competition is not new; Peterman (1984) found evidence of density-dependent interactions between Fraser River and Bristol Bay sockeye salmon. This was at a time when salmon abundance had not expanded to current levels and when hatchery fish made up a low proportion of the abundance and biomass. As salmon abundance and biomass increases, Aydin (2000) concluded that density-dependent interactions could result in negative feedback loops on prey availability in the ocean ecosystem.

Despite the existence of competitive interactions in the marine environment, high abundance and biomass have not resulted in consistent negative trends in salmon size or productivity. Ruggerone et al. (2018) reported that average size has declined for chum salmon and pink salmon since 1925, but not for sockeye salmon (Figure 8). Most of the size decline for pink and chum salmon occurred prior to 1977, which would suggest that pre-1977 regime change conditions were more important than density dependent interactions. Size of pink salmon and sockeye salmon remained stable during the recent period of high abundance, while chum salmon showed some continued decline. Jeffrey et al. (2017) reported similar results for average sizes of British Columbia pink, chum, and sockeye salmon since 1951. Pink salmon declined initially in size, and then have remained relatively stable since the 1990s at a size that is 20-30% less than in the 1950s and 1960s. There was little change over the time series in the average size of sockeye salmon. Regional differences have certainly been observed. For example, Wertheimer et al. (2004) found evidence of size declines in PWS pink salmon in relation to pink salmon abundance in the GOA, while. Shaul and Geiger (2017) reported that pink salmon size has increased in Southeast Alaska in recent years.

Helle et al. (2007) found that body-size of pink, chum, and sockeye salmon from Alaska to Oregon generally declined in after the 1977 regime shift as salmon abundance increased, until 1994. After 1994, body size of these species generally increased, during a period when biomass and abundance was at sustained high levels. They attributed the initial decline to density-dependent competition, and the lack of relationship of abundance to size in the latter period as an outcome of favorable ocean conditions. They concluded that the carrying capacity of the North Pacific Ocean for producing Pacific salmon is not a constant value and varies with changing environmental and biological factors.

In their study on size of British Columbia salmon, Jeffrey et al. (2017) examined the relationship of size trends to estimates of salmon biomass in the North Pacific Ocean. They found that the biomass of North American pink salmon entering the Gulf of Alaska was the most important biomass variable in explaining size variation in BC pink salmon. The direction of the effect was negative, suggesting intraspecific competition was affecting size. For chum salmon, combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation. The direction of the effect was negative, suggesting some degree of competition among these congeners. Biomass of North American chum salmon was the most important biomass variable explaining size variation in sockeye salmon. Adding Asian chum salmon to this (or combined measures of biomass) did not improve the fit. The direction of the effect was positive, indicating that when chums are abundant, growth conditions for sockeye are positive.

These associations (and lack of associations) between ocean abundance and size at return of Alaska and British Columbia salmon indicate that while competition can affect size and growth, density-

independent ocean conditions drive the variability in abundance and can override the impacts of density-dependent competition. We reiterate the findings of Radchenko et al. (2018) that generally, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop.

Reduced survival and productivity of wild stocks in Alaska have been attributed to competitive interactions with Asian pink salmon (Bristol Bay sockeye salmon; Ruggerone et al. 2003) and hatchery pink salmon (PWS pink salmon; Hilborn and Eggers 2001). Alternate analyses and recent trends have refuted these conclusions. In Bristol Bay sockeye salmon, Ruggerone et al. (2003) estimated reduced survivals of even-year sockeye salmon smolts from Bristol Bay at 23-45% less than odd-year smolts for the 1977 to 1997 smolt years. Even-year smolts enter the ocean when odd-year pink salmon are on average more abundant. They concluded that competitive interactions with Russian pink salmon reduced growth of even-year smolts, and resulted in substantially lower average smolt survival. However, the abundance of Russian pink salmon was highly variable over the time period for both odd and even year lines. When pink salmon abundance was considered in a time series analysis of the survival data, rather than using odd/even year average survival, there was no discernable effect of pink salmon abundance on survival (Wertheimer and Farley 2012). Subsequent to the 1997 smolt year, both Asian pink salmon and Bristol Bay sockeye salmon increased in abundance, and a marine survival index for Bristol Bay sockeye salmon smolts was positively associated with abundance (Farley et al. 2018.) Thus increasing biomass of Asian pink salmon has not constrained the continued high productivity of Bristol Bay sockeye salmon.

In PWS, Hilborn and Eggers (2000) concluded that hatchery production provided no net benefit in terms of pink salmon harvest, but was simply replacing wild production through density-dependent interactions. However, Wertheimer et al. (2004a, 2004b) showed that a density-independent index of marine survival explained much of the variability in wild pink salmon productivity, and that there was a large net benefit from enhancement to the PWS pink salmon harvest, albeit with some reduction in wild stock production attributed to the effects of size at return on fecundity. Amorosa et al. (2017) also showed large net gains from hatchery production, albeit lower than would be expected from the authors own argument for proportionate increases in wild pink salmon production following the 1977 regime shift. They minimize the contribution of hatchery fish in PWS by focusing on changes in the common property fishery, dismissing the annual cost-recovery harvest of an average of eight million pink salmon in their evaluation of benefits. The cost-recovery harvest is important to the fisheries economy of PWS, and an important benefit of the enhancement program (Pinkerton 1994). The recent analysis of productivity of PWS pink salmon for the re-certification of sustainability of PWS pink salmon showed continued sustained production of wild stocks during the hatchery era (Figure 9; Gaudet et al. 2017). The historical record returns of wild pink salmon in 2013 and then again in 2015 are particularly demonstrative that wild stocks in PWS retain their high production capacity after 40 years of hatchery enhancement.

Our discussion thus far has focused primarily on the abundance trends of pink, chum, and sockeye salmon, which combined make up most of the biomass of salmon in the North Pacific Ocean. Besides interactions among these species, there is concern that their high overall abundance is negatively impacting coho and Chinook salmon (Ruggerone et al. 2018).

The commercial harvest of coho salmon averaged 1.5 million fish from 1970-1977, then increased rapidly following the 1977 regime shift, peaking at over 9 million in 1994. From 1995 until 2017 the harvest has ranged from 3 to over 6 million fish annually, averaging 4.5 million, with no apparent trend during this period (Figure 10). Approximately 22% of the commercial harvest during the latter period has been produced from Alaska hatcheries. Recreational harvest has increased in recent years, and averaged 1.2 million fish from 2007-2017 (M. Stopha, ADF&G, personal communication).

Mallick et al. (2008) examined marine survival of 14 stocks of coho salmon in Southeast Alaska. They found evidence of effects on marine survival at local, regional, and basin scales. There was high covariation in survival regionally, and no trend was noted over the recent time period. Abundance of juvenile hatchery releases in the year coho smolts went to sea was identified as affecting marine survival, but the effect could be positive or negative, depending on stock. This result exemplifies the complex competitor/predator interactions that have been posited for coho and pink salmon. Negative impacts of large hatchery releases could indicate competition for prey resources or aggregation of prey (Beamish et al. 2018). Positive influences could be a result of “predator sheltering,” where the abundant hatchery juveniles act as a buffer on predation on the less abundant, larger coho smolts (Holtby et al. 1990; Briscoe 2004; LaCroix 2009). Abundant hatchery fry and juveniles could also provide an important forage base for coho salmon. Coho salmon juveniles are a major predator of juvenile pink salmon in nearshore marine areas (Parker 1971, Hargreaves and LeBrasseur 1985) and as adults when returning to coastal areas as the juvenile pink salmon emigrate towards the ocean (Sturdevant et al. 2012).

Shaul and Geiger (2017) showed a negative trend in marine survival in recent years for Berners River coho salmon which they related to ocean biomass of North American pink salmon. They attribute the negative impact to predation of pink salmon on squids that are the major prey for coho salmon in offshore areas. They propose that pink salmon are keystone predators of squid, exerting top-down control and thus directing the energy flow in the system. In contrast, Aydin (2000) concluded that the squid, with its high biomass and productivity, was controlling energy flow to salmon. Aydin (2000) found that squid abundance, while highly variable, had increased greatly (as did salmon) after the 1977/1978 regime shift. That squid abundance increased commensurate with salmon abundance indicates the species were responding similarly to the increased productivity in the North Pacific (Brodeur and Ware 1992). Aydin (2000) also found differences in odd and even year distributions of squid in the North Pacific, which could contribute to the odd/even differences in coho salmon size observed by Shaul and Geiger (2017).

If pink salmon impacts on squid were driving marine survival for coho salmon, we would also expect decreasing trends in abundance and marine survival for coho salmon over the 1995-2015 time period of high pink salmon abundance. Instead, catch has been stable, and marine survival declines, at least in southeast Alaska, are a recent phenomenon. Commercial harvest data for coho salmon and pink salmon show very strong correlation annually (LaCroix et al. 2009). If density-dependent interactions were primary, we would expect negative correlation. The correlation is actually strongly positive; from 1960 – 2017, it had an  $r$  value of 0.82 ( $P < 0.001$ ; Figure 10). Because returning adult coho and pink salmon have roughly the same period of time in the marine environment, this indicates that shared ocean conditions are driving their year-class strength.



Size trends in coho salmon have varied regionally, with very different relationships to ocean salmon biomass. Shaul and Geiger (2017) found that size at harvest of coho salmon in southeast Alaska increased from 1970 until 1984, then declined from 1985 to 2015. They associated the decline with an index of the biomass of North American pink salmon. Their model did not indicate direct competition, but rather lagged effects at 2- and 4- years affecting the population dynamics of the squid (*Berryteuthis anonychus*). The lag response model requires that the squid have an obligate two-year life-history cycle as proposed by Jorgensen (2011). This is contradicted by other literature, which characterizes *B. anonychus* as an annual species with high productivity (Katugin et al. 2005, Drobney et al. 2008). Aydin (2000) cites studies showing that *B. anonychus* is highly productive, and spawns twice a year.

Regardless of mechanism, coho salmon size has declined in Southeast Alaska. In contrast, coho salmon body size has increased in British Columbia in recent years. Jeffrey et al. (2017) showed coho body weight declined from the 1950s, and did not reach its minimum until around 1985. Since then it has increased and is now at the highest level in the data series. The combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation in coho salmon, and had a positive effect on size. The authors speculate that the positive relationship may be driven by environmental conditions, which when favorable allow for greater total biomass of salmon species and higher growth (thus larger size) in coho salmon. Shaul and Geiger (2017) and Jeffrey et al. (2017) both use basin-scale measures of environmental conditions in their models exploring factors affecting coho salmon size. The contrasting results for Southeast Alaska and British Columbia are indicative of the variability in response of different populations to these conditions. This may be caused by different migration patterns in the ocean environment, or different local and regional responses of availability of salmon forage to basin-scale environmental factors.

The recent disastrous returns of Chinook salmon in Alaska has precipitated considerable focus on the least abundant but (on a fish by fish basis) most highly valued salmon species (ADF&G 2013). Chinook salmon have a highly varied and diverse life history, generally more complex than other Pacific salmon exemplified by numerous variations in run and spawn timing, freshwater biology, ocean distribution and behavior patterns, diet, slower ocean growth, and older age at maturity (Healey 1991). In the eastern North Pacific most juvenile Chinook salmon from Oregon to Southeast Alaska remained within 100-200km of their natal rivers until their second year at sea, regardless of their freshwater history (sub-yearling or yearling) and spring, summer, or fall adult run timing (Trudel et al. 2009). Healey (1983) reported that most fall type Chinook salmon tend to remain continental shelf and slope oriented during much of their ocean life history whereas many spring type fish spend much of their ocean life in more offshore waters. In recent years, based on coded-wire tag recoveries, it was found that many Alaska spring-type Chinook salmon also utilize slope and continental shelf waters as immature adults. Coded - wire tagged Chinook salmon from Southeast Alaska (SEAK) and Cook Inlet frequently are recovered in Bering Sea Aleutian Island and Gulf of Alaska trawl fisheries for Walleye Pollock (Meyers et al. 2001; Celewycz et al. 2006).

Marine habitats of Chinook salmon related to depth distribution and migration patterns are diverse and often distinct from most other Pacific salmon. Juvenile Chinook salmon distribute deeper than coho and other juvenile salmon in their first summer and fall at sea (Orsi and Wertheimer 1995; Beamish 2011). Immature Chinook salmon are associated with colder temperatures and deeper depths than other salmon species (Walker et al. 2007; Walker and Myers 2009; Riddell et al. 2018). Diel vertical migrations have

been documented in a number of data storage telemetry studies, with movement to greater depths during daylight hours (Radchenko and Glebov 1998; Murphy and Heard 2001; Walker et al. 2007). One Chinook salmon tagged in the Bering sea typically was between the surface and 100 m depth, but occasionally moved to depths in excess of 350 m (Walker and Meyers 2009).

Marine diets of Chinook salmon are distinctly different than diets of pink, chum, and sockeye salmon and more similar to coho salmon (Brodeur et al. 2007; Riddell et al. 2018). Juvenile (first-ocean year) Chinook salmon in coastal waters initially have highly varied diets composed of fish, zooplankton, and insects, then become predominately piscivorous in costal habitats (Brodeur et al. 2007). Fish made up from 65% to 99% of stomach contents by weight for juvenile (ocean- age 0) Chinook salmon sampled within the inside and outer coastal waters of SEAK (Landingham et al. 1998; Weitkamp and Sturdevant 2008). Fish were also the primary prey for immature (mostly ocean-age 1) fish in SEAK (Cook and Sturdevant 2013), coastal British Columbia (Herz et al. 2017), and northern and southern Bering Sea (Farley et al. 2009). Primary prey species included capelin, sand lance, lanternfish, and Pacific herring. In more offshore habitats, Chinook salmon consume primarily fish and squid, although euphasids can make up a substantial portion of their diet (Davis 2003; Shuntov et al. 2010; Karpenko et al. 2013). Herring and sandlance dominate the diets of older immature and maturing Chinook salmon (ocean-ages 2+) in coastal waters (Reid 1961; ATA 2016), with sandlance the dominant prey in outside waters of southeast Alaska and herring the dominate prey in inside waters (ATA 2016).

Run sizes increased across AK after the 1977 regime shift, and were variable but consistently above average until a precipitous decline starting in 2006 (Figure 11). This decline was consistent with reduced marine survival of southeast Alaska stocks after the 2000 and 2001 brood years (ADF&G 2013; Ohlberger et al. 2016; CTC 2018). Thus the decline began well after the current period of high biomass of salmon in the ocean started (Figure 1), and well after hatchery releases into the North Pacific peaked and stabilized at 5 billion per year in 1988 (Figure 7).

Size at maturity and age at maturation has declined over the last three decades for Alaska Chinook salmon stocks from southern Southeast Alaska to the Yukon River (Lewis et al. 2017). The size declines are coincident with high abundances and biomass of the Big Three (pink, chum, and sockeye salmon). Could competitive interactions with the Big Three be driving the decline? There are several lines of evidence that indicate this is not the case.

First, the differences in marine ecology we noted in the preceding paragraphs suggest that Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. These differences are exemplified by the growth differences of Chinook salmon and coho salmon in their first winter at sea. Although approximately the same size in the fall, by the following year coho salmon of the same ocean cohort are over three times larger than Chinook salmon (Riddell et al. 2018).

Second, while Lewis et al. (2017) found predominately declining size for older (ocean age 3 and 4) Chinook salmon, size of ocean age 2 fish has generally not changed over the time period (Figure 12). If competition was driving the size decline, competition should be most intense for the younger age Chinook salmon, which have a more extensive overlap in size and type of prey with other salmon. Also, lower ocean growth in Pacific salmon is typically associated with shifts in age distribution towards older

ages (Hard et al. 2008), but instead average age at maturity has declined. Thus there has not been an apparent decline in growth of 1-ocean and 2-ocean age Chinook salmon during the “high abundance” period.

Third, British Columbia Chinook salmon have been increasing in average size over this time period (Jeffrey et al. 2017). These authors found a positive relationship between biomass of North American salmon and British Columbia Chinook salmon average size, indicating that size was a function of the same favorable ocean conditions sustaining the record overall biomass.

Size declines of Chinook salmon are not new in Alaska waters; Ricker (1981) found a significant decrease in size of Chinook salmon harvested in the SEAK troll fisheries from 1960 to 1974, and identified selective fishing for older, larger fish as a factor in the decline. Research by Hard et al. (2009) and others indicate selective harvesting of large older age groups of Chinook salmon can introduce reductions in fitness and cause genetic drift in growth, size, and age of maturity due to the heritability of these characteristics. However, fishing alone does not explain the decline across the geographic range of Alaska Chinook salmon, because the degree to which populations are exposed to directed selective fishing varies considerably across the range. It also does not explain the sudden decline in marine survival, as fishing pressure and exploitation rates in the ocean have not increased (CTC 2018b).

Another large predator besides humans also target larger, older Chinook salmon. Resident killer whales have been found to preferentially feed on larger Chinook salmon (Olesiuk et al. 1990; Hanson et al. 2010). In northern British Columbia and southern Alaska waters killer whales have increased at annual rates of 2.9% and 3.5%, respectively (Hilborn et al. 2012; Matkin et al. 2014), more than doubling their abundance since the 1970s. Intense predation on larger fish, coupled with lower marine survival, could contribute to the changes at size at age and age at maturity of Alaska Chinook salmon.

There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea (e.g., Greene et al. 2005; Duffy and Beuchamp 2011; Sharma et al. 2013; Murphy et al. 2017). Local conditions encountered by juvenile Chinook salmon during early marine residency thus play an important role in determining year-class strength. However, the concordant trends in survival across such a broad geographic range indicate that large-scale processes are affecting stocks across regions. Increasing populations of pinnipeds could also be affecting early marine survival. Chasco et al. (2017) estimated predation on juvenile Chinook salmon by pinnipeds in Puget Sound had increased an order of magnitude from 1970 to 2015, and was now, expressed as adult equivalences, more than six times greater than the combined commercial and recreational catches in Puget Sound.

For Pacific salmon species that spend multiple years at sea, annual marine survival generally increases with size and age (Ricker 1976). For cohort reconstruction of Pacific northwest and SEAK Chinook salmon, natural mortality is assumed not to vary interannually and to decrease with ocean age, from 40% for ocean-age 1, 30% for ocean-age 2, 20% for ocean-age 3, and 10% for ocean-age 5 or older (Sharma et al. 2013; CTC 2018b). These assumptions are simplistic and undoubtedly not always correct, but there is little information to better inform the assumptions. Changes in the North Pacific ecosystem, such as increased killer whale populations, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

## VI. Conclusions

In spite of concerns over exceeding the carrying capacity of the ocean, Alaska salmon have been at unprecedented levels of abundance over the past 25 years. Conditions influencing survival in the ocean, rather than density-dependent interactions, seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. The Alaska salmon harvest over the past 25 years has been characterized by sustained high production from wild stocks and large contributions of hatchery fish. Enhancement has made large net contributions to supplement wild stock harvest in some areas of the state. Density-dependent interactions have been observed at different life history stages of salmon and in nearshore and oceanic habitats during this period, but have not constrained the recovery of Alaska salmon from its nadir in the 1970's, or its sustained high abundance. Rather, density independent responses to climatic factors affecting ocean conditions appear to have largely driven the high and variable productivity of Alaska salmon.

Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon? Would then large releases of hatchery fish put wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? The enhancement program in PWS offers empirical support for the latter concept. Even during the recent period of generally high productivity, wild pink salmon production in PWS has fluctuated dramatically (Figure 9). In 2009, wild stock harvests were below one million fish, while over 17 million hatchery fish were harvested. By focusing harvest on hatchery fish, managers met escapement goals (Gaudet et al. 2017). Subsequently, both hatchery and wild pink salmon set new historical highs for harvest and production in 2013 and 2015. Large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

## Authors

Alex Wertheimer retired after 35 years working for the National Marine Fisheries Service Fisheries as a Fisheries Research Biologist in Alaska. He has carried out research and published extensively on salmon in Alaska on issues including salmon enhancement technology and strategies, hatchery and wild salmon interactions, bycatch mortality of Pacific salmon, the impact of the Exxon Valdez oil spill on salmon in Prince William Sound, and the nearshore and pelagic marine ecology of Pacific salmon. He was a member of the science team that wrote the Alaska Genetic Policy, the National Oceanic and Atmospheric Administration (NOAA) Biological Review Team assessing status of Chinook salmon in the Pacific northwest, and the Chinook Technical Committee of the Pacific Salmon Commission. He was awarded the Wally Nuremberg Award for Fisheries Excellence by the American Fisheries Society Alaska Chapter. Upon retirement in 2009 after 35 years of Federal service, he received the NOAA Distinguished Career Award. Since retirement, he has continued to consult on scientific studies and reviews, including forecasting of Pacific salmon, quantification of by-catch mortality, and the Pacific Salmon Recovery Plan. He currently serves on the Pacific Salmon Commission's Standing Committee on Scientific Cooperation and on the Science Panel overseeing the Alaska Hatchery Research Program. He is the President of the Board of Directors of the Southeast Alaska Land Trust, and is a member of the Board of Directors for DIPAC, Inc., a major non-association private non-profit hatchery based in Juneau. He was supported in his work on this paper by the Northern Southeast Alaska Aquaculture Association.

William (Bill) Heard retired in 2012 after 52 years of Federal Service as Fishery Research Biologist. Much of his career was with NOAA Fisheries Alaska Fisheries Science Center's Auke Bay Laboratories, but he also worked for the U.S Fish and Wildlife Service Bureau of Commercial Fisheries and Bureau of Sport Fisheries and Wildlife. He did extensive research and published frequently on Alaska salmon and other fishes. Bill authored or co-authored peer reviewed publications on all five species of North American Pacific salmon. For over 35 years he supervised research at Little Port Marine Research Station focused on enhancement technology and ecology of pink, coho and Chinook salmon. He actively participated on many technical committees and focused groups involved with Alaska, National, and International salmon issues, including Governor Jay Hammond's Fisheries Council concerned with policies and development of salmon hatcheries in Alaska, North Pacific Fishery Management Council Plan Development Team for Fishery Management Plan (FMP) on salmon fisheries, Pacific Salmon Commission (PSC) Northern Boundary Technical Committee, North Pacific Anadromous Fish Commissions (NPAFC) Committee on Scientific Research and Statistics (CSRS) and U.S.-Japan Natural Resources (UJNR) Aquaculture Panel involved with salmon hatcheries in Japan. Participating in NPAFC, PSC, and UJNR afforded opportunity for travel to most North Pacific rim countries with populations of salmon including Russia and Republic of Korea . Bill received fre awards for research excellence in fisheries from ADF&G, Alaska Chapter American Fisheries Society, U.S. Department of Commerce Bronze Medal Award, NOAA Fisheries Employee of the Year and NOAA Fisheries Distinguished Career Award. He was an Affiliate Associate Professor, University of Alaska Fairbanks, School of Fisheries and Ocean Sciences.

## Figures

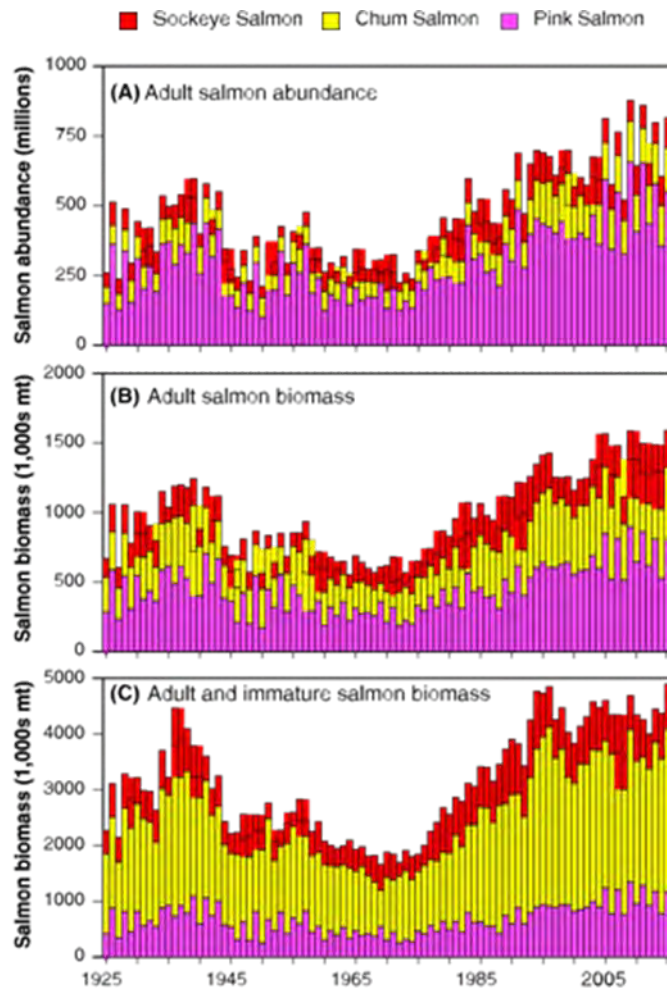


Figure 1. (A) Abundance (millions of fish), (B) adult biomass (thousands of metric tons), and (C) adult and immature biomass (thousands of metric tons) of Sockeye Salmon, Chum Salmon, and Pink Salmon in the North Pacific Ocean, 1925–2015. From Ruggerone and Irvine (2018).

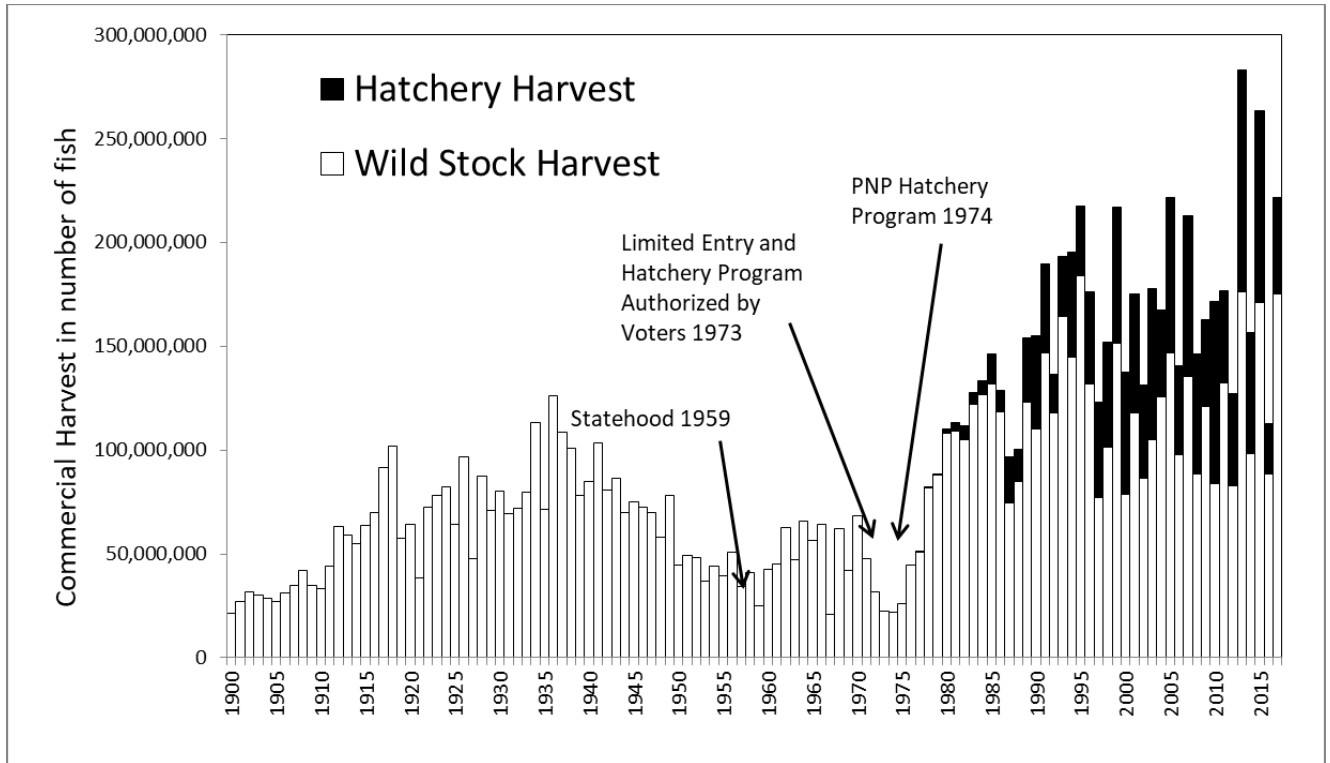


Figure 2. Commercial salmon harvest in Alaska, 1900-2017. From Stopha (2018).

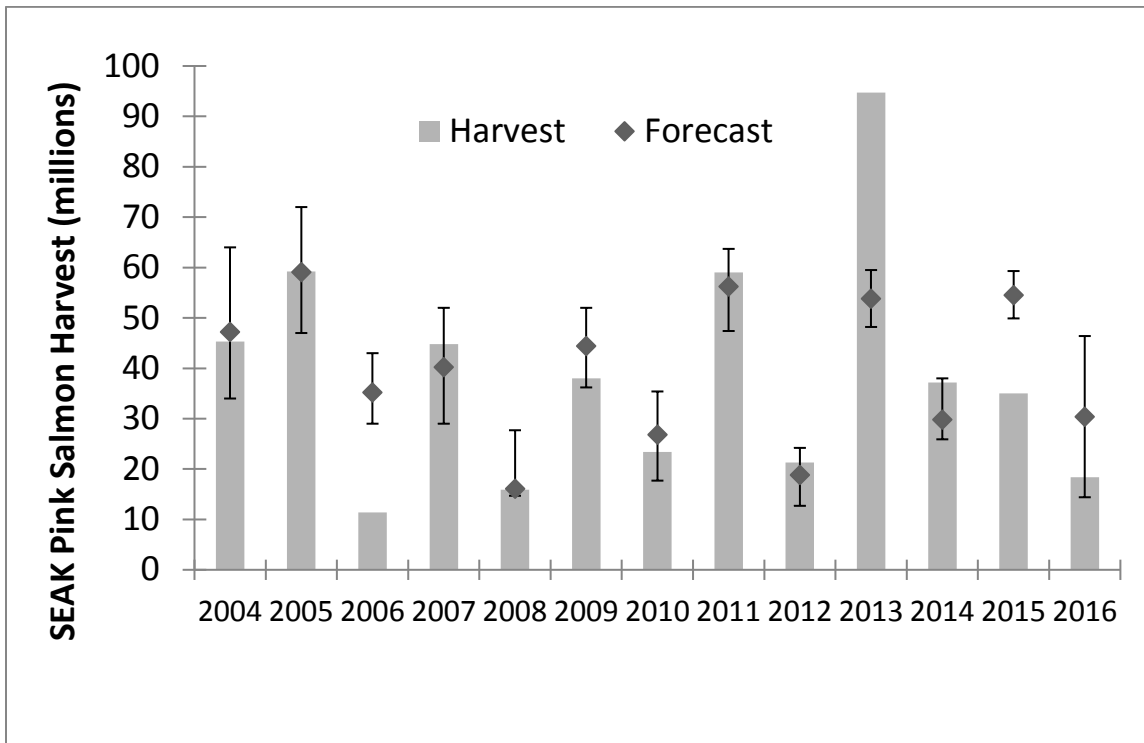


Figure 3.—Southeast Coastal Monitoring (SECM) project pink salmon harvest forecasts for Southeast Alaska (SEAK; symbols), associated 80% confidence intervals (lines), and actual SEAK pink salmon harvests (grey bars), 2004-2016.



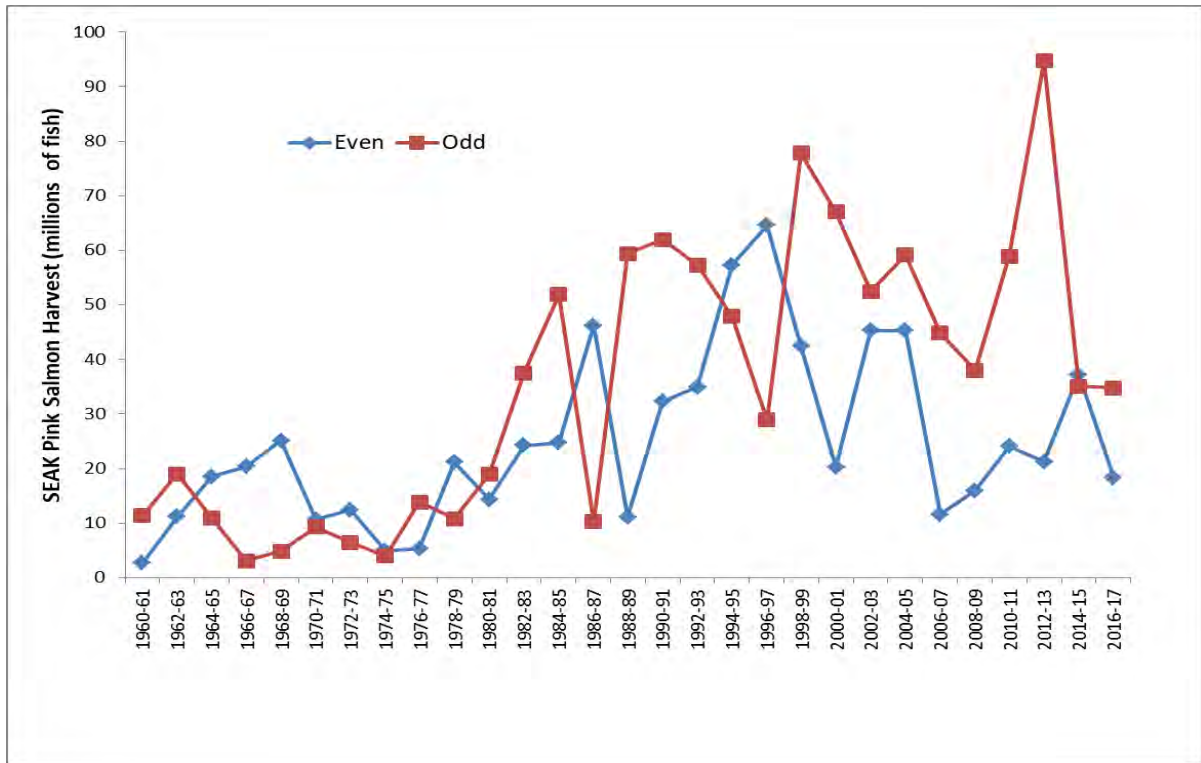


Figure 4. Even- and odd-year harvests of Southeast Alaska pink salmon, 1960-2017. Data are from Alaska Department of Fish and Game catch statistics.

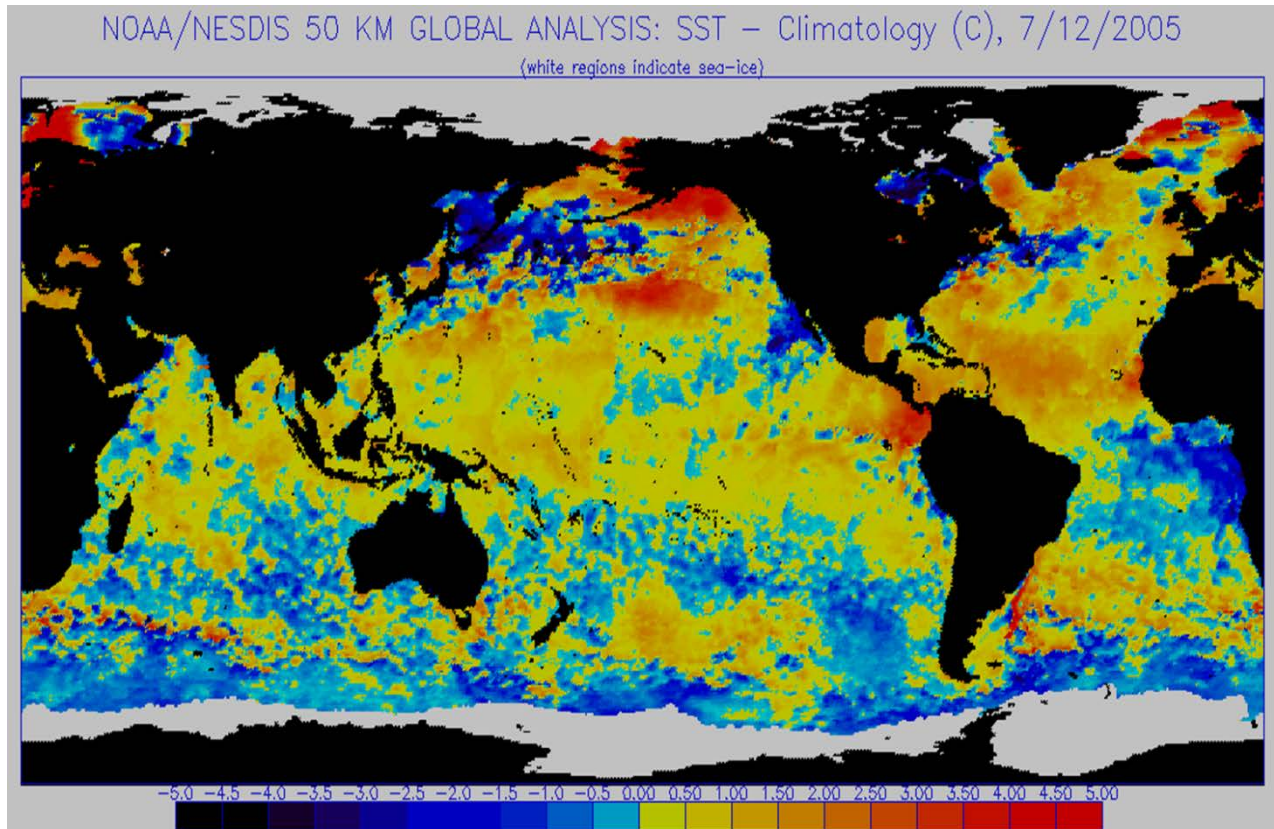


Figure 5. Sea surface temperature anomalies, July 12, 2005. NOAA Satellite and Information Service, National Environmental Satellite, Data, and Information Service (NESDIS)  
<http://www.osdpd.noaa.gov/PSB/EPS/EPS.html>

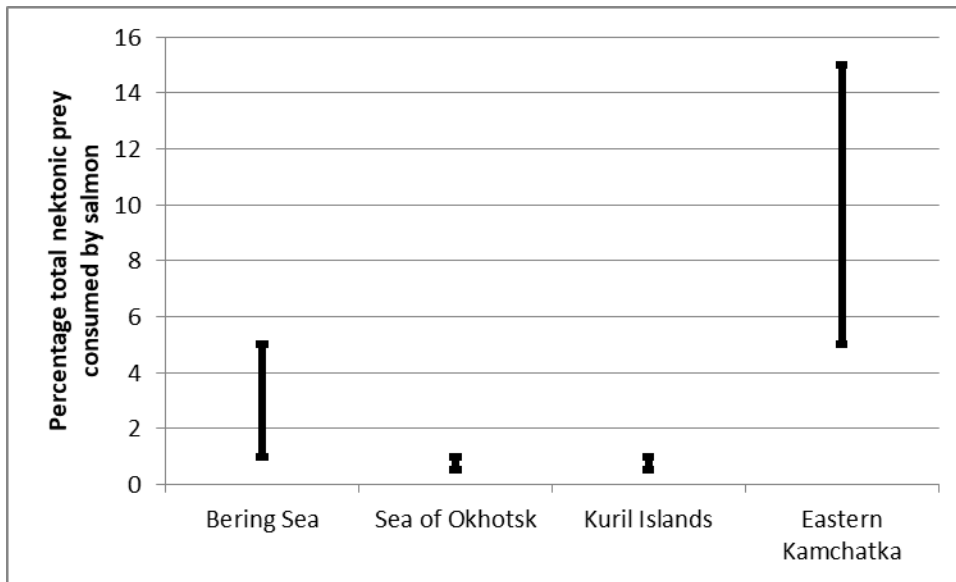


Figure 6. Percentage total nektonic prey consumed by salmon in the western North Pacific Ocean. Estimates are from Shuntov et al. (2017).

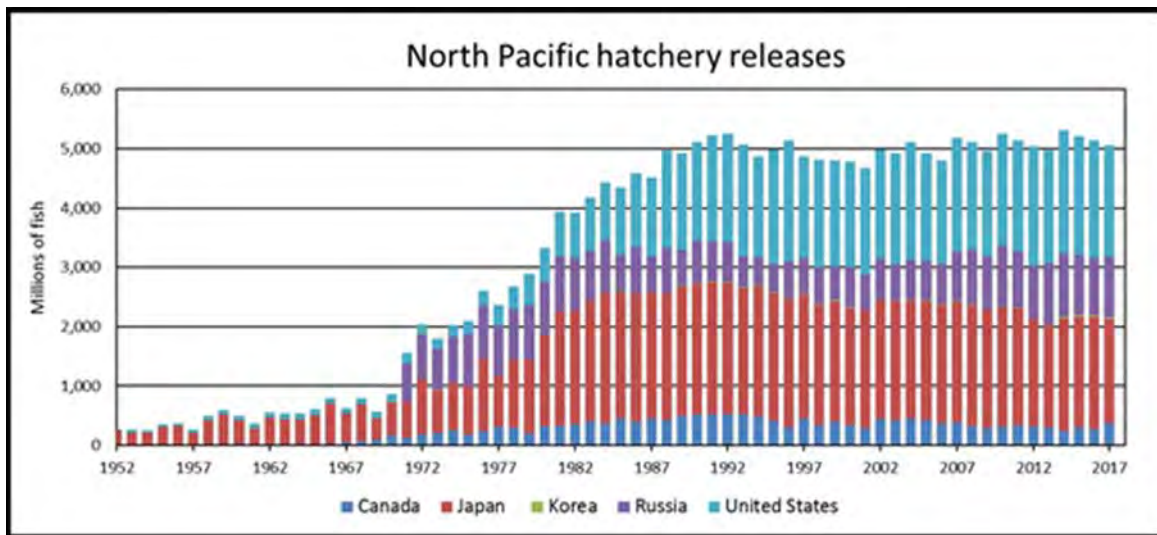


Figure 7. Hatchery releases of salmon into the North Pacific Ocean, 1952-2017. Source: North Pacific Anadromous Fish Commission.

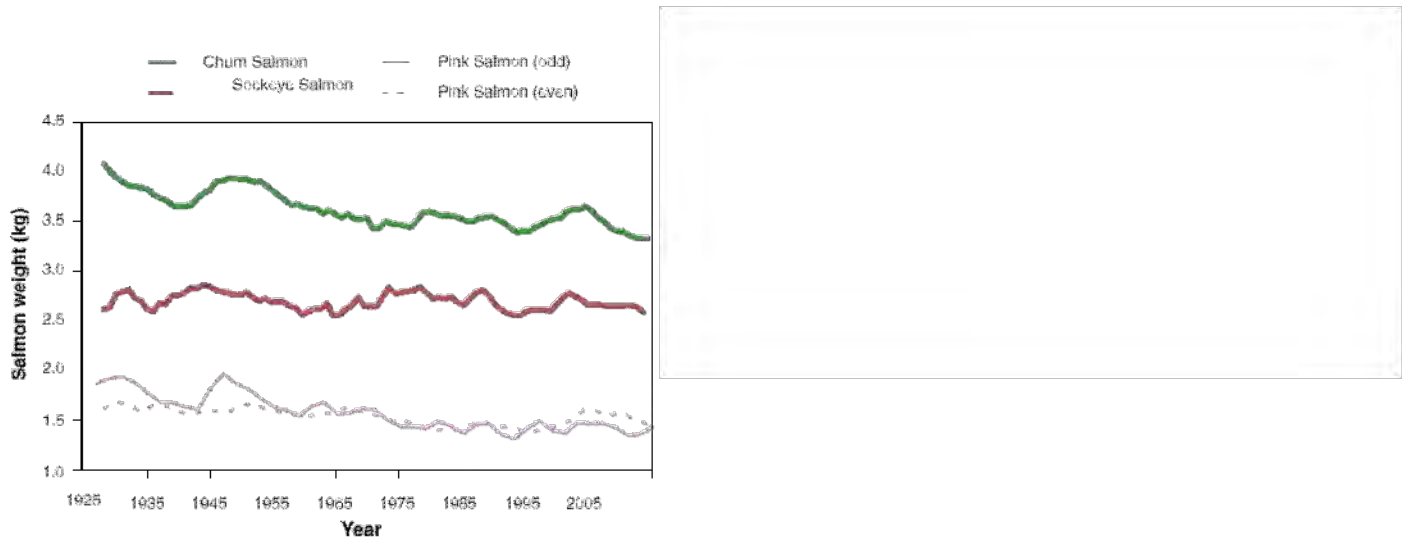


Figure 8. Average weight of pink salmon, chum salmon, and sockeye salmon captured in commercial fisheries, 1925-2015. From Ruggerone and Irvine (2018).

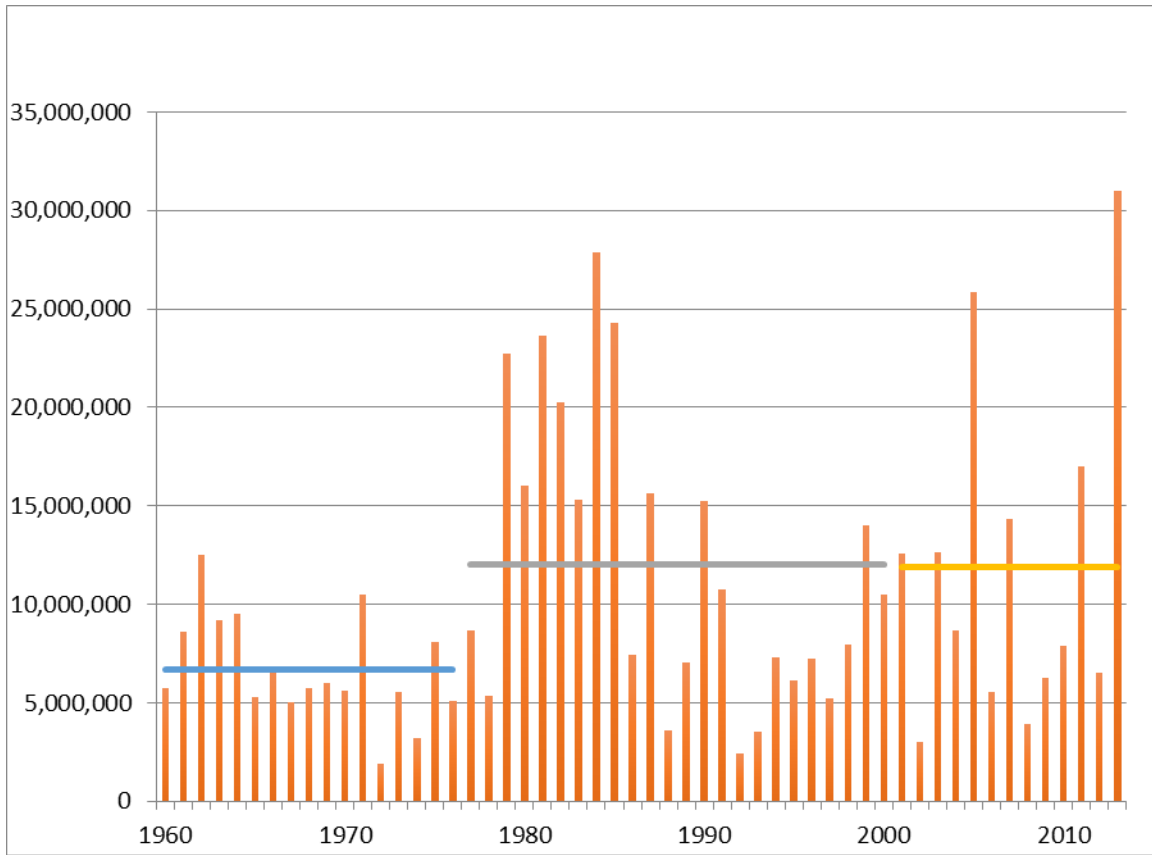


Figure 9. PWS Wild Pink Salmon Production for 1960-2013. Lines indicate average production for pre-hatchery years (1960–1976) and two hatchery time periods: 1977–2000 and 2001–2013. From Gaudet et al. (2017).

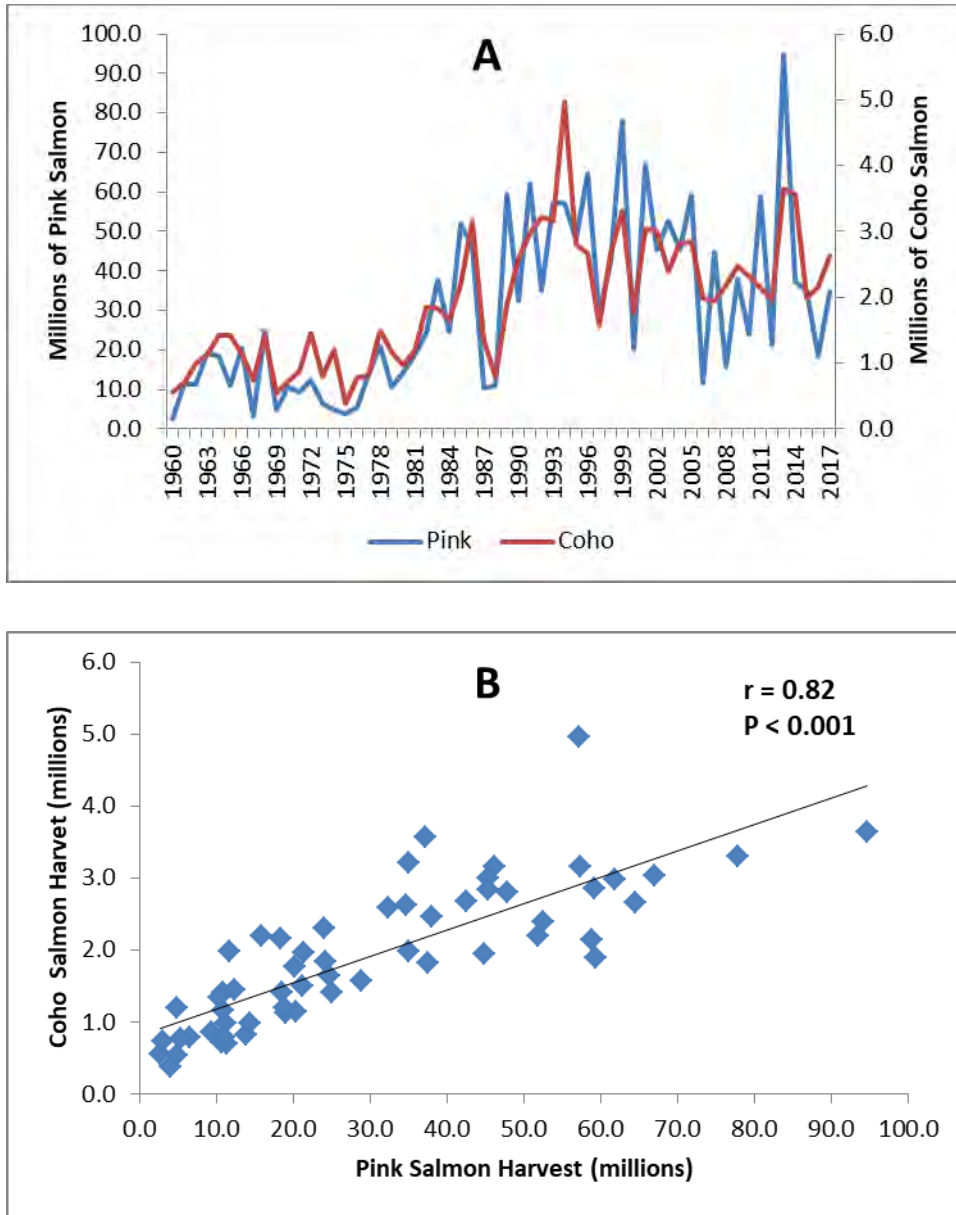


Figure 10. Commercial harvest of Southeast Alaska pink and coho salmon, 1960-2017 (A), and their correlation (B). Data are from Alaska Department of Fish and Game catch statistics.

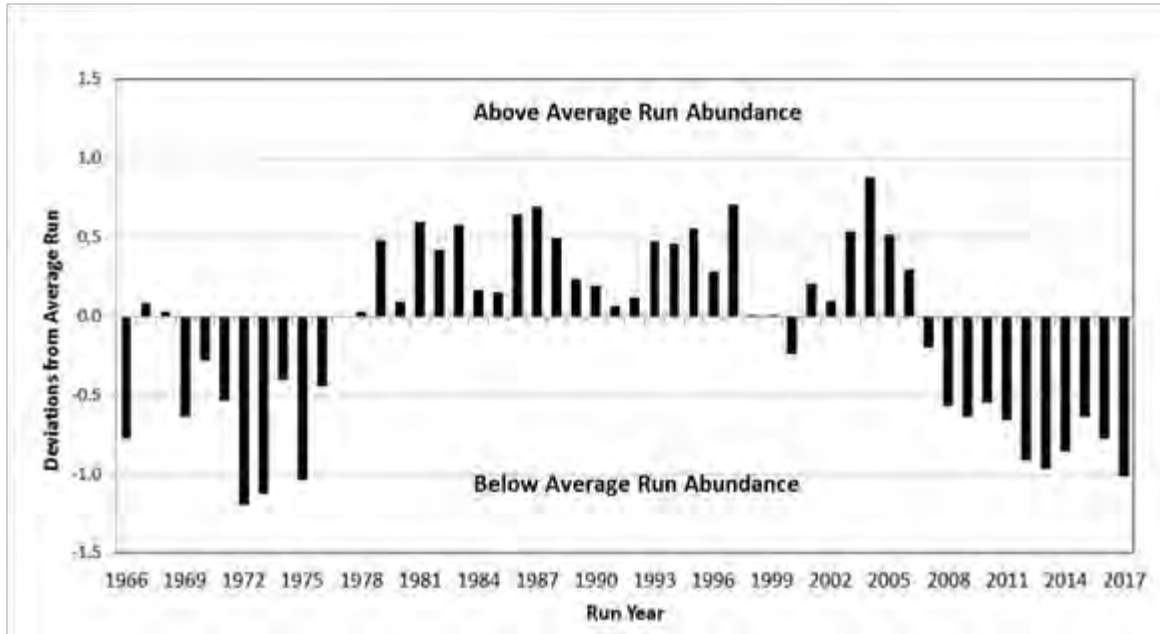


Figure 11—Average of standardized deviations from average run abundance for 21 stocks of Chinook salmon in Alaska (the Unalakleet, Nushagak, Goodnews and Kuskokwim in western Alaska; the Chena and Salcha on the Yukon River; the Canadian Yukon, the Chignik and Nelson on the Alaska Peninsula; the Karluk and Ayakulik on Kodiak Island; the Deshka, Anchor and late run Kenai in Cook Inlet, the Copper in the northeastern Gulf of Alaska, and the Situk, Alek, Chilkat, Taku, Stikine, and Unuk in Southeastern Alaska). From CTC (2018a).

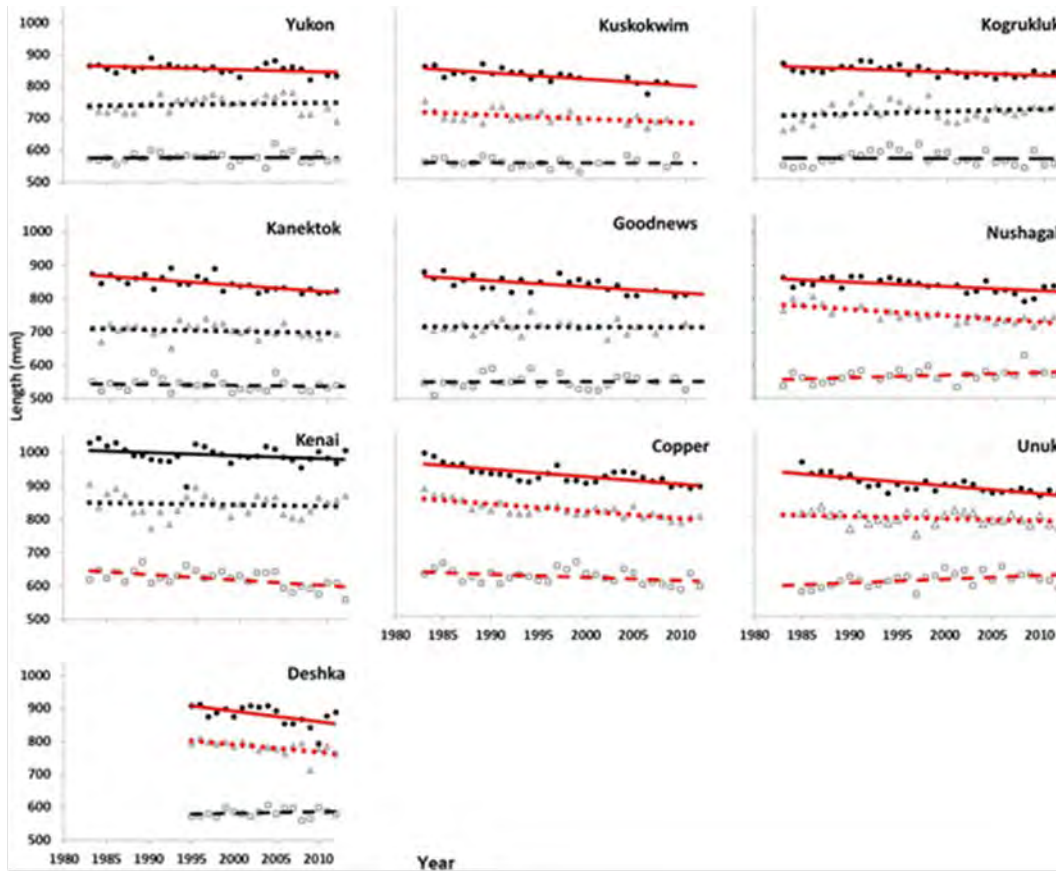


Fig 12. Linear regression of mean annual length (mm) Chinook salmon by stock, age class, and year. Closed circles and solid line = 4-ocean; triangles and dotted line = 3-ocean, open square and dashed line = 2-ocean. Red lines indicate slopes significantly different from zero ( $P < 0.05$ ). From Lewis et al. (2017).



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**Submitted by:** Phillip Null

**Community of Residence:** Kodiak

I support Proposal 182 to establish bow fishing as a lawful sport fishing gear. This initiative will provide increased recreational opportunities for anglers with a much more selective method of fishing than other currently authorized gear types. Adoption of a new legal gear type will increase recreational opportunities for many, promoting healthy lifestyles, community engagement and connection with nature. This proposal aligns with Alaska's traditions of responsible fishing and respect for our natural resources, making it a positive step forward for the state and its fishing community.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Tracey Nuzzi, and I live in Cordova, Alaska. I am a commercial fisherman and also a subsistence and sport fisherman and hunter.

If we were to adopt Proposals 170, 171, or 172, they would undermine 50 years of thoughtful hatchery production decisions made by fishermen, processors, biologists, communities, and others. These cuts would jeopardize income, job security, and our whole community that relies on these fish.

Salmon is the currency of our community—its history and industry.

In the 1970s, when fishing was very poor and making a living in Cordova was a struggle, the whole community came together to form the legislative concept for private nonprofit hatcheries. We acquired an old cannery site in Prince William Sound and learned about egg boxes and aquaculture from people in Canada to start Prince William Sound's first hatchery.

The City of Cordova sacrificed a major grant intended for its septic system to help start PWSAC. Fishermen donated hours and volunteer time to set up the first facility. Processors donated equipment. While it is a much larger organization now, it is still a community project.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Tracey Nuzzi  
Cordova, Alaska



Stephen OBrien, owner of  
FV Uyak (Kodiak Boat) and Hollywood Fish camp (Kodiak Set Net)

Comments SUPPORTING proposals;  
166 and 167

To whom it may concern,

I am here today to show SUPPORT on proposals 166 and 167.

I am a local Kodiak resident who has participated in the Kodiak Jig fishery for the past 11 years. I depend on the jig fishery to maintain a stable income for my family and crew during the winter and spring.

Each year starting in January I monitor the jig harvest rate on ADFG website. As the weeks pass, I am able to witness the total pounds and number of landings on jig cod deliveries add up. Early on in the season in January and February Jig deliveries rarely come in above 20k pounds. Mainly because the water is still cold and the cod are deep. That coupled with the short days makes it challenging to harvest jig cod that time of year. In 2025 there was a drastic increase in suspicious landings in Kodiak early in the winter that went on the Jig quota. There were numerous landings that broke the normal pattern of winter jig deliveries in Kodiak, multiple deliveries reaching over 40k lbs, which is unheard of for Kodiak jig deliveries in January and February. After further investigation it was concluded that all the unusual deliveries were coming in on long line boats that had claimed to be jigging. It was witnessed by the state troopers and cannery workers that boarded these boats that there were multiple slinky pots on deck along with snap on hooks (used for long lining) that were still in some of the cods' mouths. Current regulation does not prohibit long line gear or slinky pots on boats while jigging so there were no laws that had been broken. The only way to catch a vessel long lining on a jig trip is for the state trooper to physically catch these said vessels in the act. And even if they are caught in the act the said vessels can claim they are on a long line trip, when in actuality they were planning to deliver on the jig quota. This creates a situation where it is nearly impossible for local law enforcement to know exactly which gear type and which quota is being targeted during a trip by these long line vessels. This situation needs to be addressed to protect and maintain an honest and legal jig fishery in Kodiak.

Proposals 166 and 167 would enable law enforcement to keep the jig fishery honest and protect the jig fishery quota from fraudulent fishing activities.

Respectfully,  
Stephen OBrien

Stephen OBrien, owner of  
FV Uyak (Kodiak Boat) and Hollywood Fish camp (Kodiak Set Net)

Comments NOT IN SUPPORT of proposals 170,171 and 172.

To Whom It May Concern:

I strongly oppose Proposals 170, 171, and 172.

I am a lifelong salmon fisherman in Kodiak. Salmon fishing isn't just my job — it's how I provide for my family and stay connected to the community I've grown up in. I rely heavily on salmon runs, including hatchery fish, to make a living. In Kodiak, hatchery production plays a critical role in creating stability for fishermen, especially given our dramatic odd- and even-year swings in run strength. In the weaker cycle years, hatchery fish help smooth out those fluctuations and provide much-needed economic consistency for harvesters, processors, and local businesses.

There is no data demonstrating that Alaska hatchery pink and chum salmon are causing declines in Western Alaska salmon stocks. Proposals that call for production cuts without clear scientific evidence, measurable objectives, or a defined evaluation process create unnecessary risk and uncertainty for fishermen like me.

I oppose Proposal 171, which circumvents the established ADF&G permitting and review process. I also oppose Proposal 172 is premature and unnecessary, particularly given that there are no plans to expand pink or chum programs. Decisions about hatchery production should continue to be made at the regional level through public process, Regional Planning Teams, and ADF&G's established scientific review and permitting framework.

Respectfully,  
Stephen OBrien

**Submitted by:** Tyler OBrien

**Community of Residence:** Kodiak Alaska

My name is Tyler O'Brien from Kodiak. I have the fishing vessel Loki. I support proposal 166 and I support proposal 167 to protect our cod jigging fishery. I have participated in this fishery for almost 15 years and rely on it to make a living here in Kodiak. There has been obvious cheating happening in the last couple years and there's nothing enforcement can do about it with the current laws. Last year I witnessed long line boats delivering cod as jig fish with long line hooks and snaps still in the fish coming out of the pump at the cannery. Enforcement witnessed this too but their hands were tied due to the language of the rules. Please help us change this and make this fishery fair for everyone. Last year the jig quota was caught and season was closed before most jig boats were able to turn a decent profit while long line boats were coming in loaded.

**Submitted by:** Elaine O'Brien

**Community of Residence:** Sequim

I urge the Board to pass proposals 11, 163, 164 and 165.

It's time to put an end to discussions about the definition of so-called pelagic/midwater trawl gear that are ongoing with federeral fishery managers. Pelagic means in the middle of the water column. Period. The State of Alaska needs to step up and stand by that defined gear requirement.

The North Pacific Fishery Management Council's own scientific staff reports that pelagic gear is hard on bottom up to/more than 85% of the time on average. That means "midwater" gear continues to fish in sensitive zones that are off limits to bottom trawl gear - because of "definition" discrepancies on the gear's make-up and performance!

For years, all other Alaska fishery users - subsistence, commercial, sport, personal use - have seen bag limits and fishing time reduced. The trawl sector must be held to the same standards to protect Alaska's fisheries, ecosystems and coastal communitites.

Please note that at a time when Alaska is desperate for sustainable. economic resources - nearly 75% of the value of ALL groundfish leaves the state, primarily taken by Seattle-based trawlers. (It's 82% of the value for pollock.)

[https://reports.psmfc.org/akfin/f?p=501:910:6780133202690:INITIAL#LINK\\_URL#](https://reports.psmfc.org/akfin/f?p=501:910:6780133202690:INITIAL#LINK_URL#)

**Submitted by:** Jim & Dee Dee O'Brien

Hollywood fish camp

**Community of Residence:** Anchorage

I strongly oppose Proposals 170, 171, and 172.

I am a lifelong salmon fisherman in Kodiak. Salmon fishing isn't just my job — it's how I provide for my family and stay connected to the community I've grown up in. I rely heavily on salmon runs, including hatchery fish, to make a living. In Kodiak, hatchery production plays a critical role in creating stability for fishermen, especially given our dramatic odd- and even-year swings in run strength. In the weaker cycle years, hatchery



fish help smooth out those fluctuations and provide much-needed economic consistency for harvesters, processors, and local businesses.

There is no data demonstrating that Alaska hatchery pink and chum salmon are causing declines in Western Alaska salmon stocks. Proposals that call for production cuts without clear scientific evidence, measurable objectives, or a defined evaluation process create unnecessary risk and uncertainty for fishermen like me.

I also oppose Proposal 171, which circumvents the established ADF&G permitting and review process. Proposal 172 is premature and unnecessary, particularly given that there are no plans to expand pink or chum programs. Decisions about hatchery production should continue to be made at the regional level through public process, Regional Planning Teams, and ADF&G's established scientific review and permitting framework.

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Anchorage, AK 99501



[www.oceanconservancy.org](http://www.oceanconservancy.org)

March 2, 2026

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

Dear Chair and Board Members:

Ocean Conservancy<sup>1</sup> submits the following comments in support of Proposals 163, 164, and 165. These proposals, both individually and collectively, will advance enforceability and accountability in state water trawl fisheries, will reduce habitat and bycatch impacts and support long-term fishery and ecosystem sustainability.

Benthic habitat supports subsistence and commercial fisheries, is the foundation of ecosystem diversity and function and is critical to a myriad of species of crab, fish, marine mammals and the Tribes whose way of life is inextricably linked to our oceans. Bottom trawling is recognized as one of the most intense forms of widespread benthic disturbance throughout the world<sup>2,3</sup> and has significant negative impacts to the seafloor and benthic ecosystem function by reducing the density of organisms that cycle nutrients,<sup>4,5</sup> reducing the density of faunal biomass with each pass,<sup>6</sup> impacting biogeochemical cycles,<sup>7</sup> impairing nutrient fluxes,<sup>3</sup> and damaging biogenic bottom structure necessary for demersal fish throughout various life stages.<sup>8</sup> Areas with high trawling footprints also exhibit reduced carbon storage capabilities.<sup>9</sup>

<sup>1</sup> Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. Together with our partners, we create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it.

<sup>2</sup> Kaiser, M.J., Ramsay, K., Richardson, C.A., Spence, F.E. and Brand, A.R., 2000. Chronic fishing disturbance has changed shelf sea benthic community structure. *Journal of Animal Ecology*, 69(3), pp.494-503.

<sup>3</sup> Pitcher, C.R., Hiddink, J.G., Jennings, S., Collie, J., Parma, A.M., Amoroso, R., Mazon, T., Sciberras, M., McConnaughey, R.A., Rijnsdorp, A.D. and Kaiser, M.J., 2022. Trawl impacts on the relative status of biotic communities of seabed sedimentary habitats in 24 regions worldwide. *Proceedings of the National Academy of Sciences*, 119(2), p.e2109449119.

<sup>4</sup> Olsford, F., Schaanning, M.T., Widdicombe, S., Kendall, M.A. and Austen, M.C., 2008. Effects of bottom trawling on ecosystem functioning. *Journal of Experimental Marine Biology and Ecology*, 366(1-2), pp.123-133.

<sup>5</sup> Bradshaw, C., Jakobsson, M., Brüchert, V., Bonaglia, S., Mörth, C.M., Muchowski, J., Stranne, C. and Sköld, M., 2021. Physical disturbance by bottom trawling suspends particulate matter and alters biogeochemical processes on and near the seafloor. *Frontiers in Marine Science*, 8, p.683331.

<sup>6</sup> Hiddink, J.G., Jennings, S., Sciberras, M., Szostek, C.L., Hughes, K.M., Ellis, N., Rijnsdorp, A.D., McConnaughey, R.A., Mazon, T., Hilborn, R. and Collie, J.S., 2017. Global analysis of depletion and recovery of seabed biota after bottom trawling disturbance. *Proceedings of the National Academy of Sciences*, 114(31), pp.8301-8306.

<sup>7</sup> Pusceddu, A., Bianchelli, S., Martín, J., Puig, P., Palanques, A., Masqué, P. and Danovaro, R., 2014. Chronic and intensive bottom trawling impairs deep-sea biodiversity and ecosystem functioning. *Proceedings of the National Academy of Sciences*, 111(24), pp.8861-8866.

<sup>8</sup> Pauly, D., Christensen, V., Guénette, S., Pitcher, T.J., Sumaila, U.R., Walters, C.J., Watson, R., Zeller, D., 2002. Towards sustainability in world fisheries. *Nature* 418, 689-695.

<sup>9</sup> Zhang, W., Porz, L., Yilmaz, R., Wallmann, K., Spiegel, T., Neumann, A., Holtappels, M., Kasten, S., Kuhlmann, J., Ziebarth, N. and Taylor, B., 2024. Long-term carbon storage in shelf sea sediments reduced by intensive bottom trawling. *Nature Geoscience*, pp.1-9.

State trawl fisheries must be held to equal (if not greater) standards with regards to accountability and enforcement due to the significant habitat and bycatch impacts associated with state trawl fishing operations. State regulations currently define pelagic trawl gear as gear that *does not operate in contact with the seabed*. However, there is no compliance pathway or requirement to ensure state trawl fisheries operate within these regulatory standards for bottom contact. Meanwhile, the best available science confirms that trawl nets are estimated to contact the bottom 20-60% of the time for “pelagic” trawl catcher vessels (CV) and 70-100% for “pelagic” trawl catcher processors (CP). In the Gulf of Alaska, where a 10% bottom contact limit is in place (but not enforced), bottom contact estimates for CVs are estimated at 40%.<sup>10</sup>

The current management approach to regulating trawling in state waters therefore results in some of the largest fisheries in state waters being allowed to operate out of compliance with current law due to lack of enforcement of the standard for bottom contact. This erodes state regulatory credibility, leads to ineffective enforcement, and creates elevated and unaccounted-for risks to benthic habitat and non-target species, including salmon and crab. Proposals 163, 164, and 165 address this fundamental problem directly and will result in a more robust state management framework that provides for accountability and enforceability to ensure pelagic trawl fisheries in Alaska operate in state waters as truly as midwater fisheries.

Proposal 163 will increase transparency and accountability for trawl fisheries by treating trawl gear as bottom-contact gear unless operators can demonstrate, through enforceable verification methods, that the gear is not fishing on the seafloor. Proposal 164 builds on Proposal 163 and requires seafloor monitoring technology on pelagic trawl gear to verify compliance with state regulations. We support Proposal 164 as a critical accountability tool and practical verification method that will ensure the existing state pelagic definition is enforceable and that habitat impacts are reduced in state trawl fisheries. Proposal 165 requires salmon excluders in all pelagic trawl nets and will reduce bycatch impacts to salmon. Trawl fleets are the primary source of bycatch of multiple salmon species, many of which are experiencing significant declines (chum, Chinook). It is the state’s responsibility to minimize bycatch of salmon as a keystone species that is critical for food security, subsistence use and traditional ways of life across Alaska.

In summary, we strongly support Proposals 163, 164, and 165 as tangible and structured pathways to increase accountability and enforceability in state trawl fisheries while reducing habitat and bycatch impacts. This process can be informed and strengthened through Tribal and stakeholder engagement as well as the incorporation of available bottom contact sensor and salmon excluder technology. Thank you for your consideration of our comments.

Sincerely,



‘Wáahlaal Gíidaak Barbara Blake (Xaadas/Lingít/Ahtna)  
Vice President, Arctic & Northern Waters

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<sup>10</sup> Zeleski et al. 2022. [2022 Evaluation of Fishing Effects on Essential Fish Habitat](#). NOAA.

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March 2, 2026

Alaska Department of Fish and Game  
Board of Fisheries  
PO Box 115526  
Juneau, AK 99811

**RE: Support for Proposals 163, 164, and 165**

Dear Madam Chair Märit Carlson-Van Dort and Members of the Alaska Board of Fisheries:

Oceana urges the Board to support Proposals 163, 164, and 165 proposed by The Alaska Healthy Habitat Alliance. These proposals address pelagic (midwater) trawl gear definitions, seafloor contact monitoring, and salmon bycatch mitigation in Alaska state waters (0–3 nautical miles from shore). Together, they clarify regulatory expectations, strengthen enforcement, and reduce risks to benthic habitat and salmon populations.

Alaska Administrative Code 5 AAC 39.105 clearly establishes that pelagic trawl gear may not operate in contact with the seabed.<sup>1</sup> Pelagic trawls differ from groundfish bottom trawls primarily in that the trawl doors that keep the net open are designed to ‘fly’ above the seafloor instead of dragging along it. Unlike bottom trawls, pelagic trawls are not equipped with mitigating mechanisms such as rollers, discs, or bobbins intended to reduce impact during bottom contact. When pelagic gear operates along the seabed, weight and towing force can be applied over concentrated surfaces. The federal Gulf of Alaska Fishery Management Plan acknowledges these effects, stating:

*Non-living structures may be more affected by pelagic trawl footropes than by bottom trawl footropes because of the continuous contact and smaller, more concentrated, surfaces over which weight and towing force are applied...pelagic trawls have an almost entirely smoothing effect [on the seafloor].<sup>2</sup>*

Despite Alaska’s regulatory definition of pelagic trawl gear, analyses and fleet testimony indicate that pelagic trawl gear frequently contacts the seafloor in practice. Gulf of Alaska pelagic trawls are typically 50 to 100 meters wide, and the National Marine Fisheries

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<sup>1</sup> Alaska Administrative Code 5 AAC 39.105. Types of legal gear.

<sup>2</sup> Appendix F, FMP for Groundfish of the GOA Management Area. [GOAfmppAppendix.pdf \(npfmc.org\)](http://GOAfmppAppendix.pdf(npfmc.org))

Service (NMFS) has quantified the proportion of that nominal swept area where the gear interacts with the seabed. For pelagic trawls in the Gulf of Alaska targeting pollock and slope rockfish, NMFS estimates that seabed contact occurs across 0 to 40% of the swept area, depending on vessel type and operating conditions.<sup>3</sup> For smaller Sand Point pelagic trawl catcher vessels, NMFS determined that seabed contact occurred across 100% of the fished area.<sup>4</sup> These findings demonstrate a clear mismatch between the regulatory definition of pelagic trawl gear and its documented performance on the water.

These federal estimates are directly relevant to Alaska state waters because parallel pelagic trawl pollock fisheries in the Central and Western Gulf of Alaska (Kodiak, Chignik, and South Alaska Peninsula Areas) operate concurrently with the adjacent federal fisheries, and vessels may fish across the state–federal boundary during the same season using the same trawl gear.<sup>5</sup> Federally permitted vessels routinely participate in both federal and parallel fisheries during the same openings, subject to largely consistent management measures. As a result, seafloor contact rates observed in federal waters by NMFS provide a meaningful indicator of how pelagic trawl gear is likely to perform in state waters.

### Impacts of Seafloor Contact on Benthic Habitat

Figure 1 shows that most areas are open to pelagic trawling, including Prince William Sound. Federal reports and NOAA surveys in Prince William Sound have documented multiple benthic invertebrate groups characteristic of structure-forming habitats, including sponges, stony corals (e.g., *Caryophyllia* spp.), gorgonian corals such as red tree corals, soft corals, and similar taxa.<sup>6,7</sup>

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<sup>3</sup> Zaleski, M., T.S. Smeltz, S. Rheinsmith, J.L. Pirtle, and G.A. Harrington. 2022 Evaluation of Fishing Effects on Essential Fish Habitat January 2023. NPFMC C4 EFH Component 2. Fishing Effects Evaluation (February 2023)

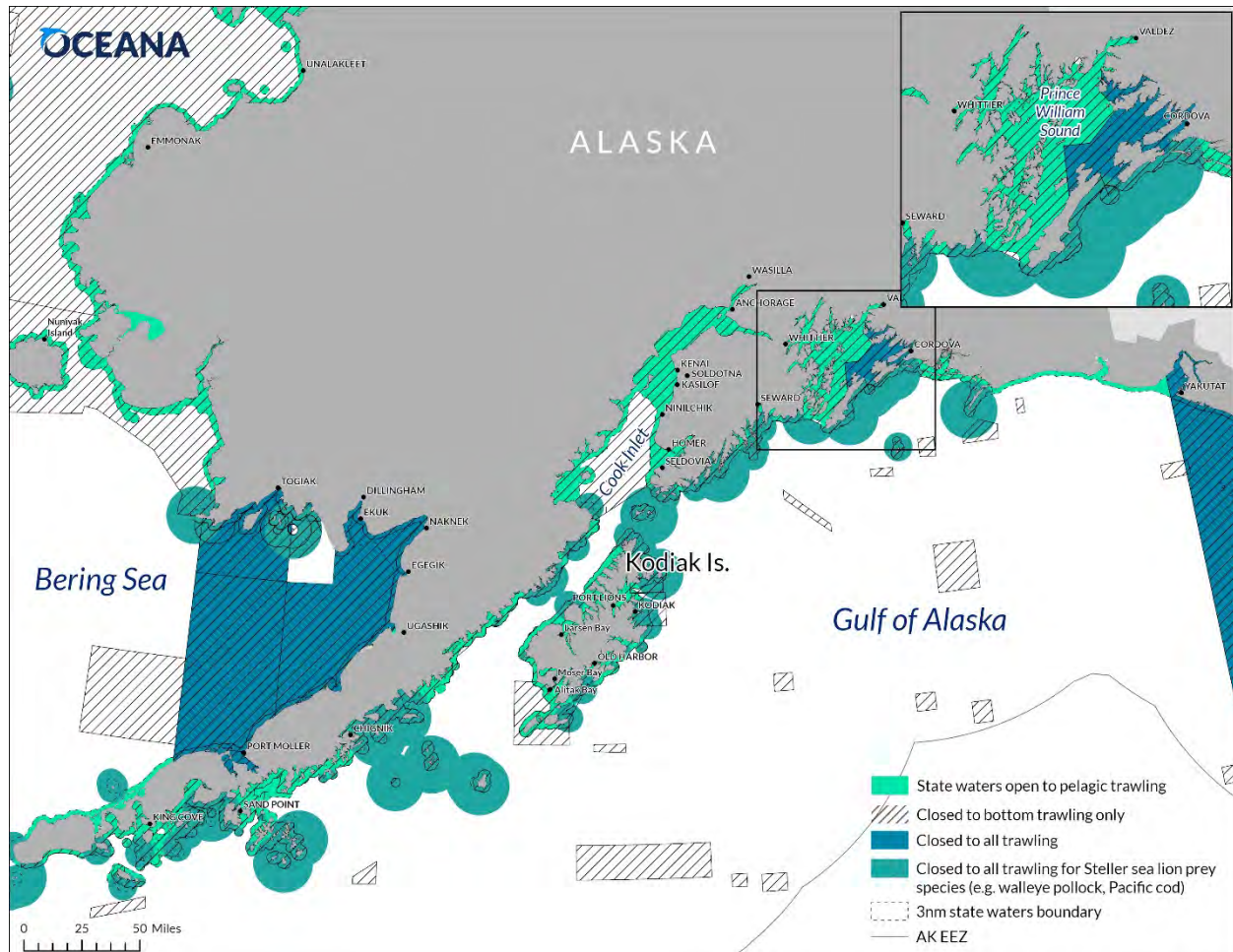
<sup>4</sup> Zaleski, M, TS Smeltz, and S Rheinsmith et al. (February 2023). 2022 Evaluation of Fishing Effects on Essential Fish Habitat. January 2023. NPFMC C4 EFH Component 2 Fishing Effects Evaluation at Table A2.1

<sup>5</sup> Alaska Department of Fish and Game, “Current CGOA Pollock Fishery in State Waters.”

[https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/cgoapollockworkgroup/pdfs/cgoa\\_fishery.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/cgoapollockworkgroup/pdfs/cgoa_fishery.pdf)

<sup>6</sup> NOAA Office of Ocean Exploration and Research, *Seascope Alaska 5 Expedition*, Dive 19 (Lone Island, Prince William Sound) <https://oceanexplorer.noaa.gov/explorations/>

<sup>7</sup> Cimberg, R.L., T. Gerrodette, and K. Muzik. 1981. *Habitat Requirements and Expected Distribution of Alaska Coral*. Outer Continental Shelf Environmental Assessment Program, Research Unit 601. Final Report, October 1981. U.S. Department of the Interior. <https://www.govinfo.gov/content/pkg/GOVPUB-I-5b25276401e812e05c5de98b45b57123/pdf/GOVPUB-I-5b25276401e812e05c5de98b45b57123.pdf>



**Figure 1.** Spatial distribution of trawl regulations in marine waters off Alaska, including state waters open to pelagic trawling, bottom-trawl-only closures, full trawl (pelagic and bottom) closures, and Steller sea lion (SSL) prey species closures. The 3 nautical mile state waters boundary and U.S. Exclusive Economic Zone (EEZ) are shown for regulatory context.

The ecological consequences of repeated seafloor contact are well established. The National Academy of Sciences Consensus Study Report,<sup>8</sup> “Effects of Trawling & Dredging on Seafloor Habitat” reflects scientific consensus from hundreds of studies worldwide. The study concluded that trawling on the seafloor reduces the complexity, productivity, and three-dimensional structure of seafloor habitats by smoothing bedforms, eliminating bottom roughness, and destroying structures like sponges and corals. There have not been new studies that refute this scientific consensus. In fact, trawling on the seafloor is the most

<sup>8</sup> National Research Council. 2002. Effects of Trawling and Dredging on Seafloor Habitat. Washington, DC: The National Academies Press. <https://doi.org/10.17226/10323>

widespread cause of reduced habitat complexity along the North American continental shelf and slope.<sup>9</sup> With heavy chain footropes, pelagic trawl gear contacting the seafloor may cause damage equal to or greater than gear specifically engineered for bottom contact.

Deep-sea corals and sponges, which occur in Alaska state waters, epitomize some of the most sensitive biogenic habitats because they are long-lived, typically inhabit low-disturbance habitats, and are highly vulnerable to disturbance. Cold-water corals are known to live for hundreds, or even thousands, of years.<sup>10</sup> For example, Risk et al. (2002)<sup>11</sup> showed ages of over 300 years for red tree corals (*Primnoa resedaeformis*), a species that NOAA has documented in Alaska state waters open to pelagic trawling. Heikoop et al. (2002)<sup>12</sup> found that deep sea corals (*Primnoa* spp.) in Alaska and elsewhere have lifespans of several centuries. Roark et al. (2005)<sup>13</sup> used radiocarbon dating techniques to conclude that bamboo corals from the Gulf of Alaska are long-lived (75–126 years). Sponges present in the Alaska region are known to live for hundreds of years. Leys and Lauzon (1998)<sup>14</sup> found large deep water hexactinellid sponges to be 220 years old with average growth rates of 1.98 cm/year. These sponges are found throughout Alaska, particularly in the Aleutian Islands and Gulf of Alaska. Knowlton and Highsmith (2000)<sup>15</sup> found that *Halichondria panicea*, a sponge found in the Gulf of Alaska, is also long-lived.

The approximately 70 species of cold-water corals documented throughout the Gulf of Alaska<sup>16</sup> help to create complex “coral gardens” that provide habitat for invertebrates such as basket stars and anemones, as well as commercially important species including rockfishes, cod, and flatfishes. Fish and crab use coral habitat for shelter and feeding sites because there is often increased prey abundance. Some rockfishes, such as yelloweye

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<sup>9</sup> *Id.* NRC 2002.

<sup>10</sup> Prouty et al. 2017. Age, Growth Rates, and Paleoclimate studies in deep-sea corals of the U.S. In: Hourigan TF, Etnoyer PJ, Cairns SD (eds.). The State of Deep-Sea Coral and Sponge Ecosystems of the United States. NOAA Technical Memorandum NMFS-OHC-4. Silver Spring, MD.

<sup>11</sup> Risk, M. H., J. M. Heikoop, M. G. Snow, and R. Beukens. 2002. Lifespans and growth patterns of two deep-sea corals: *Primnoa resedaeformis* and *Desmophyllum cristagalli*. *Hydrobiologia* 471: 125–131; Roark, E. B., T. P. Guilderson, S. FloodPage, R. B. Dunbar, B. L. Ingram, S. J. Fallon, and M. McCulloch. 2005. Radiocarbon-based ages and growth rates of bamboo corals from the Gulf of Alaska, *Geophys. Res. Lett.* 32: 5.

<sup>12</sup> Heikoop, J., D. Hickmott, M. Risk, C. Shearer and V. Atudorei (2002). Potential climate signals from the deep-sea gorgonian coral *Primnoa resedaeformis*. *HYDROBIOLOGIA* 471, SI: 117-124

<sup>13</sup> Roark et al. 2005. Radiocarbon-based ages and growth rates of bamboo corals from the Gulf of Alaska. *Geophysical Research Letters* 32(4). DOI:10.1029/2004GL021919

<sup>14</sup> Leys, S. P. and N. R. J. Lauzon (1998). Hexactinellid sponge ecology: growth rates and seasonality in deep water sponges. *Journal of Experimental Marine Biology and Ecology* 230(1): 111-129.

<sup>15</sup> Knowlton, A. and R. Highsmith (2000). Convergence in the time-space continuum: a predator-prey interaction. *Marine Ecology Progress Series* 197: 285-291.

<sup>16</sup> Stone RP and Cairns SD. 2020. Deep-Sea Coral Taxa in the Alaska Region: Depth and Geographical Distribution (v. 2020). Available: <https://deepseacoraldata.noaa.gov/library/2020-regional-deep-sea-coral-specieslist>

rockfish, use the shelter of coral and sponge gardens as juvenile, spawning, and breeding habitat.<sup>17,18</sup>

There are 50 confirmed sponge species in the Gulf of Alaska, but scientists predict there could be more than 80.<sup>19</sup> Like corals, sponges are a fundamental component of the Gulf of Alaska’s benthic ecosystems and contribute significantly to living marine habitat. Large sponge aggregations, often occurring alongside corals, provide shelter, feeding areas, and breeding habitat for fish and other invertebrates, supporting broader food webs and marine biodiversity in the region.

Sea whips and sea pens (pennatulids) found in the Gulf of Alaska are habitat-forming cold-water corals. They provide vertical structure in soft sediments and can create habitat up to a meter in height in what would otherwise be a flat, featureless plain. Sea whip groves provide cover from predators and enhance the abundance and availability of prey species. For example, Pacific ocean perch have been observed using sea whip groves as shelter at night after feeding on krill above the groves during the day.<sup>20</sup>

Cold-water corals, sponges, and pennatulids are long-lived and slow-growing, and recovery from physical disturbance can take decades to centuries. As documented above, pelagic trawl gear in the Gulf of Alaska frequently contacts the seafloor. In Alaska state waters, such contact places structure-forming habitats that support commercially important species—including rockfishes, cod, flatfishes, and crab—at risk. Damage to these habitats can reduce ecosystem productivity and, over time, affect the fisheries that sustain coastal communities and Alaska’s broader economy.

### **Aligning Gear Classification, Monitoring, and Bycatch Requirements**

Although state regulation establishes that pelagic trawl gear may not operate in contact with the seabed, existing monitoring and enforcement mechanisms are not sufficient to consistently verify compliance. As a result, gear designated as “pelagic” may function in ways that cause benthic disturbance similar to bottom trawling. This gap between regulatory definition and operational reality exposes sensitive seafloor habitats to preventable risk.

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<sup>17</sup> Stone RP and Shotwell SK. 2007. State of Deep Coral Ecosystems in the Alaska Region: Gulf of Alaska, Bering Sea and the Aleutian Islands. pp. 65-108. In: Lumsden SE, Hourigan TF, Bruckner AW and Dorr G (eds.) The State of Deep Coral Ecosystems of the United States. NOAA Technical Memorandum CRCP-3. Silver Spring MD 365p

<sup>18</sup> North Pacific Fishery Management Council (NPFMC). 2020. Fishery Management Plan for Groundfish of the Gulf of Alaska. November 2020. Anchorage, Alaska.

<sup>19</sup> Hoff GR, Malecha PW, Rooper CN, et al. 2021. Science Plan for the Alaska Deep-Sea Coral and Sponge Initiative (AKCSI): 2020-2023. AFSC Processed Rep. 2021- 01, 45 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115

<sup>20</sup> Brodeur RD. 2001. Habitat-specific distribution of Pacific ocean perch (*Sebastes alutus*) in Pribilof Canyon, Bering Sea. Cont Shelf Res 21:207–224



March 2, 2026  
Support for Proposals 163–165  
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**Proposal 163** addresses this gap by aligning gear classification with documented performance. Since pelagic trawls are contacting the seabed, they should be managed as bottom-contact gear unless, and until, operators can demonstrate true midwater operation. This creates accountability.

**Proposal 164** provides the enforcement mechanism necessary to make 5 AAC 39.105 meaningful. Requiring approved seafloor contact detection systems and clear data standards ensures that compliance is measurable, transparent, and consistently applied. Monitoring transforms an unenforceable expectation into a verifiable standard.

**Proposal 165** addresses salmon bycatch through technology already proven in the Bering Sea pelagic trawl pollock fishery. Salmon excluder devices have demonstrated that bycatch reduction can be achieved while maintaining operational efficiency. Extending this requirement to pelagic trawl fisheries within Alaska state waters reflects both practical experience and Alaska’s longstanding commitment to salmon conservation.

Together, Proposals 163–165 strengthen compliance with existing state law, reduce risk to long-lived benthic habitats, and improve accountability and bycatch performance without unnecessarily restricting access. Aligning gear definitions, monitoring requirements, and bycatch mitigation with documented gear behavior will help ensure that pelagic trawl fisheries operate in a manner consistent with Alaska’s habitat protections and economic priorities.

For these reasons, we urge the Board to support Proposals 163–165.

Sincerely,



Lauren Hynes  
North Pacific Campaign Manager and Marine Scientist  
[lhynes@oceana.org](mailto:lhynes@oceana.org)

**Submitted by:** Chandler OConnell

**Community of Residence:** Sitka

Dear Board of Fisheries,

I am writing to urge you to support proposals 163, 164 and 165. I believe they offer pragmatic and necessary solutions to ensure that existing State of Alaska regulations prohibiting seafloor contact by pelagic trawls are respected and enforced.

There are many vessels currently considered "pelagic" trawls that actually have substantial contact with the seafloor, directly contradicting the intended definition of pelagic trawls and undermining Alaska's regulatory goals. Much information to this effect has been presented to the North Pacific Fishery Management Council. Proposal 163 would correct this issue by considering trawls as bottom trawls unless they can provide positive proof that they are operating off of the sea floor and are complying with state regulations. The seafloor is an important and sensitive habitat and we should all be responsible for not damaging it.

Proposal 164 complements the important change that would be made by proposal 163, by providing better documentation for managers and the trawl fleet. Transparency, accountability and good data support sustainable fisheries; proposal 164 is good for all constituents.

And finally, proposal 165 is an important step to limit bycatch and to protect Alaska's precious salmon, which are essential for culture, food, community and economy. My household is highly dependent on salmon both as a primary food with which we nourish our children, and as a source of revenue through commercial trolling. Our Alaska Native friends and neighbors have been in relationship with salmon for millenia. Any salmon bycatch is a horrible loss, especially in the context in which entire communities are facing food insecurity and are being denied the opportunity to practice their way of life.

The Trawl industry has unsustainable and harmful bycatch levels of many species. Please use every tool at your disposal to rectify this crisis, including passing proposal 165 to require salmon excluders on pelagic trawls operated in state waters.

Thank you for considering my comment. Again, please vote for and work for passage of proposals 163, 164 and 165.

Sincerely,

Chandler O'Connell

**Submitted by:** Victoria OConnell Curran

**Community of Residence:** Sitka

Dear Chairman and Board Members,

Thank you for the opportunity to comment on statewide proposals. I have lived in Alaska for over 40 years, 20 of which I was the Groundfish Project Leader for the Alaska Department of Fish and Game, Commercial Fisheries Division.

I support Proposal 163, 164, 165. As a package they begin restoring accountability for the pelagic trawl sector and protect critical marine habitats necessary for sustainable fisheries. Evidence shows that many pelagic trawl operations are fishing on bottom, a direct violation under the definition of pelagic trawling. Requiring seafloor monitoring technology on pelagic trawl nets would provide verification that pelagic trawlers are fishing pelagic waters not bottom trawling. Requiring the use of salmon excluders in pelagic trawl nets is something I think

everyone will support and they are already standard gear in federal fisheries. One only had to listen to the heartbreaking testimony at the North Pacific Council meeting to understand we must do a better job managing bycatch and salmon.

I support proposal 180 – I agree with Mr. Krygier that chinook salmon are facing a crisis and escapement goals are not being met in many rivers. An annual statewide sport fish limit of 5 chinook is reasonable. Increasing the accuracy and efficiency in annual reporting is a necessary for successful management.

I oppose proposal 177. An angler should be required to catch their own fish. Allowing the bag limit to be pooled means that the combined bag limit is more likely to be taken and puts additional pressure on the resource. Folks are sport fishing, not subsistence fishing. No pooling of bag limits.

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PC355

**Submitted by:** Makoto Odlin

**Community of Residence:** Kodiak

Proposal 166, 167

I am submitting my support for these two proposals on behalf of myself. I have been jigging the last few years and it has increasingly important aspect of my business plan. I execute the fishery with my 13y/o daughter and it has been rough to see the blatant disregard for the rules in this fishery because I rely on this income to help the ever-increasing costs of fuel, insurance, maintenance, etc. Boats have been fishing different different gear types and delivering as jig cod. More definitions and only one gear type allowed while jigging cod will help enforcement officers to easily recognize whether a boat is in compliance from a distance and/or at the dock while delivering or whatnot. We desperately need to show that we are making steps toward accountability.

There is no guarantee that these measures will eradicate all cheating but it is progress. Last season I witnessed, multiple times, longliners working offshore in federal waters all night, come in to state waters anchor up next to me and then go to sleep. Never seen anyone working the deck all day. Yet somehow these guys were making huge deliveries under state jig cod.... all this when not a single federal jig cod delivery was ever made. Not only that, but guys had slinky pots and longlines onboard, some reports of huge deliveries with only one jig machine onboard.... pretty flagrant....

I would really like to see support for proposal 166 and 167, thank you.

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PC355

**Submitted by:** Makoto Odlin

**Community of Residence:** Kodiak

Proposal 176- Oppose

Proposal 177- Oppose

I personally oppose these two proposals because I have seen this pooling be abused by the charter industry. I have seen deckhands and captains bring kids and friends to 'fill out the boat,' so clients could catch and keep more limits of fish. Too much potential for taking more fish out of the water than would otherwise have been taken. Catch your fish as allowed by ADF&G no ifs, ands, or buts.

Proposal 180- Support

I would support a state wide seasonal bag limit of 5 fish. Chinook are at a point where they need all the help they can get, and as we have seen commercial fisheries shut down early or experience severe restrictions, I think sport fishermen probably have a higher rate of take of local Alaskan king salmon due to their increased efforts in or near the native rivers.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Makoto Odlin, and I am a commercial fisherman who salmon seines in Kodiak, Alaska. I fish aboard the F/V Laidy Sage.

The hatchery helps many boats through the season and spreads the fleet around in a way that increases fishing time for everyone. It helps fill in people's seasons in years when wild stocks are low.

Reduced hatchery production would reduce harvest opportunities while increasing effort and competition in other areas. This hurts everyone on the water, and local businesses see reduced spending as a result.

It seems premature to start reducing hatchery production without doing extensive research to determine what positive results would come from that reduction. We could be making changes without clearly defined markers of success. Will Russia, Canada, and lower 48 hatchery production remain constant, making it difficult to measure impact? What would be the benchmarks for determining success or failure?

Please keep to science-based management rather than adopting measures without clear data demonstrating benefits.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm

coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Makoto Odlin  
Kodiak, Alaska



Patrick O'Donnell  
Golden West Fisheries, Inc. and F/V Caravelle  
PO Box 3075  
Kodiak, Alaska 99615

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March 2, 2026

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Anchorage, AK 99811

Re: **Oppose Proposals 11, 163, 164, 165**

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Patrick O'Donnell and I have lived and fished out of Kodiak for 37 years. I own an 85-foot trawler that is a family run business employing my daughter, son, and brother, along with 4-5 additional crew that also live in Kodiak. In total my vessel supports 7 families on an annual basis. All of repairs and maintenance for the Caravelle also take place in Kodiak, which further supports local businesses.

**Proposal 11 opposition.** I oppose proposal 11 because it would eliminate all trawling in state waters West of 170 longitude, including the State water cod fishery and federal parallel cod fishery. Table 29 in Staff Comments shows that trawling for Pacific cod is limited to 1,537 square miles, which is equivalent to 39.2 miles X 39.2 miles. To put this in context, a single statistical area in the Gulf of Alaska is 30 miles X 30 miles, and there are more than 200 statistical areas in the GOA. In other words, the amount of area currently available for trawlers to harvest cod West of 170 longitude is very limited.

If this proposal is approved it will essentially shut down Pacific cod trawl operations. The shelf in this area is very narrow<sup>1</sup> and Pacific cod mostly occur on the shelf, which is within state waters. Since cod are much less accessible for catcher-vessels out in deeper water the result of restricting trawl fishing from inside 3-miles will be near elimination of the trawl cod fishery in its entirety. This will create even more challenges for the community of Adak, which is actively working to restart shore-based processing operations. Removing the ability for trawl to harvest cod near Adak will further curtail these efforts, and preclude shore-based processing operations which would benefit all gear types fishing in the area

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<sup>1</sup> See NOAA chart 16460

The proposer states that the intent is to reduce impacts and bycatch of Golden King Crab inside state waters. However, based on Table 30 in Staff Comments (Regional Information Report NO. 5J25-04) the only year there was appreciable crab catch in the trawl fishery was 2021 at 396 crab. In 2020,2022,2023 and 2025 there were 0 crab taken, and 2024 had 1 crab taken. Overall, this averages to 66 crab per year, but in fact four out of six years had no crab bycatch at all.

**Proposal 163 opposition:** I oppose this proposal because pelagic trawl is already clearly defined in State regulation<sup>2</sup>, and Gulf of Alaska trawlers do not use pelagic trawl gear to fish for bottom fish. I have fished out of Kodiak with trawl gear for over 36 years and can tell you that seabed in the Gulf is mostly volcanic and rocky with few exceptions. Bottom trawl gear is designed for fishing on this type of bottom for cod, flatfish rockfish and pollock. On the other hand, pelagic or midwater trawl is designed for fishing well clear of the bottom and primarily in the midwater column. If this was not the case then we would be using pelagic trawl gear to catch bottom-dwelling cod fish, but we are not. Most of the fishing grounds in the Gulf of Alaska inside State waters and particularly around Kodiak are on steep shelves and in canyons, dangerous conditions for pelagic trawl gear. A pelagic midwater net, codend, bridles, net sonars, catch sensors and third-wire costs on average \$300,000. Why would I take the risk of destroying that amount of gear on a net that was designed never to touch the seafloor.

The proposal indicates that reports from the North Pacific Fishery Management Council state that trawl fleet representatives affirm that pelagic trawl regularly operate outside of the state definition for pelagic trawl, but fails to note this report was specific to the Bering Sea and should not be assumed to apply to the Gulf of Alaska. I am telling you that this is not the case in the Gulf.

**Proposal 164 opposition:** I oppose this proposal. There is currently no technology available to support this proposal, and while there are bottom contact sensors available for static gear (gear that doesn't move) and depth recordings, there is currently no equipment available for mobile gear. The fishing line on a pelagic trawl is 500- 1000 feet and requirements would need to specify where sensors need to be placed on the trawl, and how far apart each sensor should be. Further these sensors are in the price range of \$5-10K each, and have not been field tested in actual fishing operations. The cost alone will be cost prohibitive to the small trawl vessels fishing in the Gulf of Alaska, and the technology has not even been proven as an accurate means of measuring or sensing bottom contact. The state of Alaska has no means or oversight and monitoring to verify data moving forward with this, however if this is something that ADF&G is willing to take on I will gladly participate moving forward if they are willing to fund it through an experimental fishery permit.

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<sup>2</sup> Pelagic Trawl 5AAC 39.105 (C) a pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, do not operate in contact with the seabed, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed

**Proposal 165 opposition:** I oppose this proposal. I have personally been involved in the development of halibut excluders in the late 2000's and also in modified sweep and crab vitality studies in the last decade. In 2014 I was one of the vessels selected to participate under the experimental fishery permit (EFP) to test Salmon Excluders in the Gulf of Alaska. Design for this particular excluder had been ongoing for 5 years of which I spent time at the flume tank<sup>3</sup> in Newfoundland with many different net designers while trying to build and perfect the excluder which is being used today. There is no off the shelf type of excluder, and there are many factors involved in designing an excluder for a particular vessel because the net is designed to match the engine horse power, reduction gear, propeller size, shaft horsepower and bollard pull. Each codend dimension is different based on the size of the vessel and the width of the stern ramp which also relates to vessel horse power. The takeaway point is that there is no one size fits all, and it's not like going to the store and buying a loaf of bread. I have 5 midwater trawl nets, all of which have salmon excluders. Four of the excluders are built in to the tapered end of the net or intermediate, with different configurations for different nets. I cannot swap any of these excluders between nets because they are all different and customized to the specific net.

The proposer of 163, 164, and 165 is The Alaska Healthy Habitat Alliance which consists of:

- Alaska longline Fisheries Association
- Under Sixty Cod harvesters
- Bering Sea Fishermen's Association
- Homer Charters Association
- Native Peoples action
- The Boat Company
- AMCC Alaska Marine Community Coalition (was Alaska Marine Conservation Council)

None of these groups participates in trawl fisheries, and there seems to be a substantial lack of understanding of trawl operations and how trawl gear functions, since the result of these proposals would be to completely shut down trawl.

I rely on trawl fishing to keep my business operating, to support my family, and the families of all of my crew. Everyone one of these proposals could have devastating impacts on my business, other small Alaskan trawl operations, the shore-based processing plants we deliver to, all the people who work at the plants, and the Alaskan coastal communities in which we live.

I strongly oppose all of these proposals and ask the Board to vote them down.

Sincerely,

Patrick O'Donnell  
F/V Caravelle

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<sup>3</sup> There is no flume tank in the U.S., and all gear testing is generally done in Newfoundland, Canada, or in Denmark





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.M26006

Ms. Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM), working with the other participating agencies, has reviewed the proposals being considered at the March 2026 Statewide Finfish and Supplemental Issues Meeting. The attached comments from OSM regard proposals that are associated with finfish resources within Federal subsistence management jurisdiction and are likely to impact federally qualified subsistence users.

Other proposals being considered may affect Federal subsistence fisheries and users. Many of these proposals involve fisheries outside of 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. Furthermore, any of the ten Subsistence Regional Advisory Councils may have submitted written comments on these proposals, and we encourage the Board to consider these comments during its deliberations. OSM may also wish to comment during the meeting on other items that impact federally qualified subsistence users.

We appreciate the opportunity to comment 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 Scott Ayers, OSM Deputy Director (Sciences), 907-744-3824 or [scott\\_ayers@ios.doi.gov](mailto:scott_ayers@ios.doi.gov), with any questions you may have concerning these materials.

Sincerely,

*Crystal Leonetti*

Crystal (Ciisquq) Leonetti  
Director,  
Office of Subsistence Management

Enclosure

Märit Carlson-Van Dort, Chair

PC357

2

Cc: Federal Subsistence Board  
Interagency Staff Committee  
Office of Subsistence Management  
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game  
Administrative Record

**PROPOSAL 162****5 AAC 01.010. Methods, means, and general provisions.**

Prohibit commercial transport services in subsistence fisheries

**Current Federal Regulations:**

No similar regulations

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

**Impact to Federal subsistence opportunities/fish:** If this proposal is adopted, State regulations would prohibit commercial transport services for use in subsistence fisheries. Federal subsistence regulations do not provide parallel prohibitions, creating a mismatch in State and Federal regulations that may lead to user confusion or enforcement issues. This may increase Federal subsistence opportunity by reducing competition from State users that require commercial transport services to access the resource. Impacts on fish populations are likely negligible.

If adopted, a similar proposal could be submitted to the Federal Subsistence Management Program during the current open Federal fisheries proposal application period in 2026.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** The Office of Subsistence Management supports effective regulatory enforcement, which benefits from alignment of Federal and State regulations on this issue. Currently, Federal regulations (36 CFR 242 and 43 CFR 51) do not explicitly address commercial or compensated transport services in subsistence fisheries. If Proposal 162 is adopted, State regulations would prohibit such activities creating a mismatch in State and Federal regulations.

**PROPOSAL 175****5 AAC 39.105. Types of legal gear.**

Modify dipnet mesh-size and configuration

**Current Federal Regulations:**

*43 CFR 51.25 (a) Definitions*

*Dip net means a bag-shaped net supported on all sides by a rigid frame; the maximum straight-line distance between any two points on the net frame, as measured through the net opening, may not exceed 5 feet; the depth of the bag must be at least one-half of the greatest straight-line distance, as measured through the net opening; no portion of the bag may be constructed of webbing that exceeds a stretched measurement of 4.5 inches; the frame must be attached to a*

*single rigid handle and be operated by hand.*

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

**Impact to Federal subsistence opportunities/fish:** If this proposal is adopted, State regulations would reduce net mesh size from 4.5 inches to 3.5 inches and prohibit the use of a rope attached to the net handle on one end, and the boat on the other, for use in subsistence fisheries. This proposal would not affect opportunity of federally qualified subsistence users fishing under Federal regulations. Federal subsistence regulations at 43 CFR 51.25(a) allow for dip net mesh up to 4.5-inch webbing on a frame that must be attached to a single rigid handle and be operated by hand. This change in mesh size is unlikely to have clear effects on mortality or capture rate of Chinook Salmon.

Federally qualified subsistence users would experience impacts due to regulatory complexity. Enforcement would be inconsistent across jurisdictions, as some rivers have State and Federal subsistence fisheries occurring at the same time. Access points to and from Federal public waters are the same as for some State subsistence or personal use areas regulated under State subsistence harvest. This conflict could lead to enforcement concerns. For example, Moose Meadows site and Mile 48 site of the Kenai River are Federal subsistence fisheries where use of a dipnet with 4.5 inch stretched mesh from a boat is permitted. Kenai River also supports a vibrant and robust personal use dip net fishery where dip netting from a boat is currently permitted. Additionally, this proposal could create a cost burden for federally qualified subsistence users who may need to purchase multiple dip nets or net bags to comply with differing State and Federal mesh size regulations.

If adopted, a similar proposal could be submitted to the Federal Subsistence Board during the current open Federal fisheries proposal application period in 2026.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** The Office of Subsistence Management supports effective regulatory enforcement, which requires alignment of Federal and State regulations on this issue. Currently, 43 CFR 51.25(a) allows mesh 4.5-inch mesh net and this proposal is unlikely to provide additional conservation for fish populations of concern.

## **PROPOSAL 182**

### **5 AAC 75.XXX. New Section.**

Establish bow fishing as lawful sport fishing gear for species without a bag or possession limit

#### **Current Federal Regulations:**

No similar regulations

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

**Impact to Federal subsistence users/fish:** This proposal seeks to allow the use of bow and arrow as a gear type for harvest of fish species that have no harvest limit. Currently, bow and arrow are not a legal gear type under Federal subsistence regulations in most areas of the state. Federally qualified subsistence users may use bow and arrow in limited locations, for salmon only: the Alaska Peninsula, specific areas within Bristol Bay (Togiak NWR, Sixmile Lake and its tributaries near Lake Clark National Park and Preserve, Lake Clark and its tributaries), and the Chignik Area (Chignik Lake). No impacts on fish populations are expected from this proposal.

If adopted, a similar proposal could be submitted to the Federal Subsistence Board during the current open Federal fisheries proposal application period in 2026.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** Adopting this proposal would misalign the Federal and State regulation. Bow fishing is not a legal gear type for subsistence fishing under Federal subsistence regulations in most areas of the state. No impacts on fish populations are expected.

PC358

**Submitted by:** Paul O'Keefe

**Community of Residence:** Crandon, Wisconsin

Having spent time on a small cruise boat adjacent to the Tongas National Forest in Alaska, I am requesting that you strongly consider banning trawler style commercial fishing in that area. It is a pristine area that should not be destroyed.

---

PC359

**Submitted by:** Eshokhai Omogbeme

ALASKA WORKER APPRENTICESHIP WELDER 8141 SCHOON STREET/CHARTER COLLEGE

**Community of Residence:** SEWARD-MATANUSKA BOROUGH

COAST GUARD REGULATIONS AND DAILY SPORT MANAGEMENT FOR THE GULF OF ALASKA ATTRACTS INVESTORS AND TRAWLERS FROM ALL WALKS OF LIFE TO BOOST ECO TOURISM AND ALL THE BENEFITS IT BRINGS BY DIVERSITY AND INCLUSION ,ENVIRONMENTAL IMPACT OF CONSERVATORY AND EXTENSION TRAINING DEVELOPMENT TO PROTECT YAKUTAT BIRD WATCHING, BEAD MAKING AND LONG DISTANCE MARATHON IN THE LAST FRONTIER. FORESTRY FIRE STARTERS CAUSED BY CAMPING IN THE HINTERLAND COULD BE CHECKED BY WORKING WITH FOREST RANGERS AND COPS TO CHECK DETRACTORS AND IMPLEMENT COMMON SENSE CRIME AND HOMELESSNESS FOR PEOPLE WHO FEEL THEY HAVE BEEN NEGLECTED BY THE SYSTEM

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PC360

**Submitted by:** Nels Otness

**Community of Residence:** Petersburg

Proposal 170,I oppose this proposal, i fished salmon before the hatcheries, there weren't many wild stock around and no one was making much money. Without the status quo with our hatcheries today, well it would probably bankrupt me.

---

Dear members of the Board,

My name is Makena O'Toole. I am a life-long Cordova resident and commercial fisherman. I serve on the local ADFG advisory council, CDFU board and PWSAC board. I'm also one of the few fishermen still actively participating in the commercial coho set-net fishery on the Tsiu and Kaliakh rivers. I obviously oppose proposals 170,171,172. However, I am going to focus my comments today on opposition of proposal 187.

Firstly, I'll point out: The Board allowing this ACR to become an out-of-cycle proposal illustrates a breakdown of proper board process and undermines the integrity and credibility of the Board as a whole. This ACR clearly met none of the criteria needed to become an out of cycle proposal. Below, I will address each of the three criteria required:

1. "Conservation or Allocation Emergency"

There is clearly no conservation issue as the Tsiu and Kaliakh have met or exceeded escapement goals since records began 53 years ago. A claim I doubt any other river in Alaska can make.

2. " Cannot wait until the regular cycle"

There's no reason this couldn't have waited until regular cycle. There is precedent for rivers with separate management plans converging in Area D. None of the historical scenarios have ever resulted in an ACR or any action needed from Board of Fish. In these situations, ADFG has proven time and time again: they are fully capable of utilizing in-season management to ensure escapement goals are met. The rivers in question have been drifting slowly towards each other for over a decade. Their confluence formed two seasons ago. This was not a "sudden" or "unforeseen" event. There was no "storm surge" in 2025, as the proposer claims.

The confluence of the rivers actually moved in spring of 2024. No concerns were raised by any stakeholders or management in 2024, despite aerial surveys. In 2025, in response to this ACR, we sent the Board time-stamped photos and satellite images from 8680 (the previous year) to confirm that the change in river confluence occurred the previous season, the fishery was managed effectively, and there were no escapement concerns. In 2025, to assuage the concerns raised in this proposal, Management used their authority to move boundary lines in-season as needed on an opener-to-opener basis. This was done to avoid "perceived" user group conflicts, not out of legitimate concerns of meeting escapement. Escapement goals were met in 2025 and was presumed to be met in 2024 but could not be verified due to lack of late season aerial surveys;

Furthermore, hearing this ACR out of cycle creates an unnecessary time and financial burden for stakeholders, forcing us to take time off work to travel to Anchorage for these meetings.

3. " The issue was not and could not have been raised earlier."

This issue absolutely could have and would have been raised earlier when the rivers first intersected in the spring of 2024, if any parties other than the proposer actually saw this as an issue. ADFG was fully aware of this confluence, and had ample time to raise the issue if they judged that it might impede their ability to manage "maximum sustainable yield" or were in any way concerned it may inhibit them from making their escapement goals. However, the Department did not raise this as a concern.

Despite the ACR not meeting any of the above-mentioned criteria, somehow this proposal is on the floor.

## Proposal 187:

This proposal is purely allocative. The first sentence is "close all waters of the Tsiu river" before he tries to draw away focus by talking about the Kaliakh confluence. There is absolutely no conservation issue here. Since 2017 there has only been an average of 4 commercial permits fishing here vs the historical level of up to 40 permits on the Tsiu (and 37 on the Kaliakh). Historically, harvest on the Tsiu was 50,000-70,000 fish at its peak. Since 2018 the highest commercial harvest on the Tsiu was only 1,640 fish! Sport harvest in 2024 as was voluntarily reported, was 6,945 fish. This number does not take into account mortality rates on the 30,541 fish that were reported as landed that year. Furthermore, with our current fishing practices, we are severely limited by weather and the capacity of our small boats. As we now run the fish back 130 miles across the open Gulf of Alaska versus the historical practice of flying multiple DC3's a day full of fish out of the river. The truth is, even if the Tsiu and Kaliak were open 7 days a week, with current logistical challenges we would only be able to harvest a small fraction of historical catch. Most years I am thrilled if I have the weather to make it down to fish three or four openers a year. Each time I hope to catch 300-600 fish which is what I can safely transit the bar and the gulf with.

The goal of the proposer is not to ensure escapement goals, it is to permanently shut down a commercial fishery on the Tsiu river—a commercial fishery that has supported



the local communities of Yakutat and Cordova for 100 yrs. Native fishermen from both communities were salting salmon for commercial sale back to the 1920's. Throughout this fishery's history, the majority of permit holders have been native fishermen from Yakutat and Cordova. This proposal would effectively re-allocate the entirety of this resource to non\_resident.sportfishermen\_\_the proposer's personal clientele. I'll remind the board that, this is not commercial VS subsistence, or even commercial VS personal use. This is commercial VS non-resident sport.

A little historical context on the importance of this resource to the Yakutat setnet fishery: This river used to support over 40 permit holders and their families. It was the single largest coho contributor to the commercial catch in area D for decades, producing 30-50% of the total area D harvest. Around 2013 rivers moved, making traditional air transport difficult. Participation dropped off due to challenging logistics of getting fish to market. Rivers are ever-changing and I fully believe participation would have increased back to meaningful levels if it wasn't for regulation passed at this board in 2017 (5.AAC 30.320), which introduced a new regulation limiting fishing time to just two 24 hour openers a week, until escapement goals are met. This regulation effectively shut down the Tsiu. Due to extreme weather, challenging logistics, and fish going blush, it was no longer economically viable to continue a full-scale fishery on the Tsiu River. This was economically damaging to Cordova and devastating to Yakutat. As long as this river remains open by regulation there is hope for the future generation of Yakutat and Cordova to re-open access to this resource and provide a vital source of income to these remote communities.

Since 2017 there have only been four to five permits fishing on these rivers. Although we have skiffs, cabins, four wheelers and fish trailers to fish the upper Tsiu, we mainly fish on the Kaliakh. Previously, we've made concerted efforts to avoid the Tsiu specifically to reduce the impact on sport fishermen. We are limited in harvest to what our small boats can pack and weight restrictions to safely cross the ocean bar with. The area in question at the confluence of the Kaliakh and Tsiu rivers is the only part of the river that is deep enough for us to get our boats into. Even then, we are often limited to only a couple hours of operation at the highest part of the tide. Closing this section of the river to us, would in effect close the whole fishery due to water depth or would push us to operate in areas of high sport fishing activity on the upper Tsiu. This area of coastline is ever changing and fishermen and management need maximum flexibility in regulation in order to align fishing time and area with very limited weather windows. Any increase in mandated regulation will only impede the Department's ability to manage for maximum sustainable yield for all user groups and to ensure escapement stays within optimal levels. If there ever truly was any concern about escapement, the only way to have meaningful impact would be to restrict sport harvest, as commercial harvest is just a small fraction of sport.

We have developed a good working relationship with most of the lodge owners on the Tsiu and frequently haul freight down on our boats to assist them in keeping their

operating costs down. We are proactive in discussing our fishing plans with the local guides prior to openers, to ensure we operate with as little impact as possible on their operations.

This proposal was never about biological concern. It was about one lodge owner who had access the entire river and doesn't want to have to look at us fishing in the one small postage stamp that's actually deep enough for us to fish. There are miles of clear pristine river full of fish with no commercial activity available to their clients. The reason for the proposer's focus on this part of the river is, traditionally when the Tsiu flowed into the ocean, lodge owners would bring clients to the mouth so they could retain higher "salt water" bag limits. Now, because the Tsiu terminates into the Kaliakh, some lodge owners are under the impression that these higher bag limits still apply, although the Tsiu is no longer classified as a saltwater terminus (it now terminates into freshwater, the Kaliakh river). Ironically, shortly after the proposer submitted this ACR, an Actual storm surge came and cut out the bank of the river, effectively eliminating his access to this section of the river. It seems to me that Karma has already addressed this issue before the Board could get to it.

There are plenty of fish for all in this river. In order to maintain this abundance, it is crucial that we don't take away the Department's only tool to manage this river and prevent over-escapement levels. Concurrently, it is important that we preserve this legacy fishery for future generations of commercial fishermen from Cordova and Yakutat. I hope that the board can understand the cultural, historical, and economical importance of preserving this fishery.

Thank you for your time and consideration.

Respectfully,

Makena O'Toole

# OUZINKIE

## NATIVE CORPORATION

Alaska Board of Fisheries  
1255 W 8th Street  
P.O. Box 115526  
Juneau, AK 99811-5526

February 26, 2026

Re: Opposition to Proposals 170, 171 and 172

Dear Madam Chair and Board members:

Ouzinkie Native Corporation is the ANCSA village corporation for the community of Ouzinkie on Spruce Island just north of Kodiak Island. We have been advocating to maintain and enhance fishing opportunities for Ouzinkie shareholders for many years. We oppose Board of Fisheries proposals 170, 171 and 172 and recommend that the Board take no action on these proposals.

Proposals 170, the reduction of hatchery output by 25%, would directly impact Ouzinkie in that the two Kodiak Regional Aquaculture Association (KRAA) projects imprinting sockeye salmon and coho salmon in Ouzinkie's harbor will be extinguished. These projects provide important subsistence fish for our community --- available to all Ouzinkie residents, not just those that have a skiff and can travel for subsistence fish. These subsistence fish are a big deal for Ouzinkie and proposal 170 will take them away.

Proposal 172 is also of concern for Ouzinkie. A moratorium on any additional hatchery permits or the expansion of existing permits may limit future fishing opportunities for Ouzinkie shareholders. KRAA has been considering expanding existing hatchery capacity to enable raising additional Chinook salmon and sockeye salmon. This is a concrete example of how a moratorium will harm Ouzinkie fishermen— sport, subsistence and commercial. Currently, much of the west side of Kodiak Island is closed to sport, subsistence and commercial fishing from May through early July due to limited Chinook salmon returning to the Karluk and Ayakulik rivers. KRAA's chinook enhancement contributions to these

# OUZINKIE

## NATIVE CORPORATION

populations may enable Ouzinkie shareholders to have additional June fishing opportunities. A moratorium on permits stops this possibility. ONC believes that the broad blanket moratorium on hatchery production will have many unexpected and unintended consequences. It's better for the Board to address region specific and species-specific issues regarding hatchery production. Speaking of region-specific issues, proposal 171 is specific to Prince William Sound hatchery production and should be addressed as a regional issue during the Prince William Sound board and/or Cook Inlet Board cycle.

Thank you in advance for your consideration of Ouzinkie Native Corporation's recommendation to take no action on proposals 170, 171, and 172.

Sincerely,



Darren Muller Sr.,

Chairman

Ouzinkie Native Corporation



Native Village of Ouzinkie

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Date 2/23/2026

Alaska Board of Fisheries  
1255 W 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Opposition to Proposals 170 and 172**

Dear Board of Fisheries members:

The Native Village of Ouzinkie is the IRA tribal entity for Ouzinkie. Our tribe has subsisted on fish and marine resources since before recorded history. We continue to be avid subsistence fishermen and active hunters. For many years Ouzinkie tribal members have enjoyed the stocking of coho salmon in Ouzinkie as well as the imprinting of sockeye salmon on Ouzinkie's harbor. These stocking programs were initiated by the Kodiak Regional Aquaculture Association (KRAA) to help Ouzinkie tribal members who do not have a skiff obtain their subsistence fish and now provide most of the subsistence salmon captured and used by the tribe. Proposals 170 and 172 jeopardize our subsistence fish.

Proposal 170 would reduce KRAA's egg take by 25% and proposal and 172 would limit KRAA from expanding their egg take. If KRAA's egg take is reduced by 25% the organization is likely to focus exclusively on fish that generate revenue to KRAA and commercial fishermen. Enhancement projects like subsistence coho and sockeye in Ouzinkie and coho in Port Lions that are not "revenue generating" will likely go away. This could also be true for a moratorium on the number of eggs taken by KRAA. The organization is likely to prioritize hatchery space so that current egg take permits are maximized and the Native Village of Ouzinkie is again concerned that subsistence projects will go away.

The Native Village of Ouzinkie believes that Kodiak Regional Aquaculture Association has worked hard to support our tribe's subsistence needs as well and the enhancement of common property fish. We don't see that KRAA's practices and activities should be penalized by the Boards acceptance of either proposal 170 and 172.

Sincerely Yours,

Robbie Boskofsky, President Ouzinkie Tribal Council

**Submitted by:** Emma Owecke

**Community of Residence:** Homer

Proposal 164 and 165 - support. Both of these proposals are essential in maintaining the health of the ocean, the viability of the fishery, and keeping fishermen in compliance. Both of these proposals are no brainers if you care about the ocean. Please approve.

Proposal 175 - support, I support a dip net mesh size reduction.

Proposal 180 - support.

Proposal 187 - oppose, this is an allocative proposal. It is also a proposal based on the authors fears. Just because the river has changed, does not mean that the salmon run is threatened or in danger. There are currently no grounds for this proposal.

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**Submitted by:** Paul Owecke

**Community of Residence:** Trempealeau, Wisconsin

Thankyou all BOF members for your efforts to protect and facilitate Alaskan fisheries.

I am a salmon setnet permit holder in PW S and have participated in the fishery for 42 years, and have also been employed prior to entry in the fishery as a fish culturist for ADFG.

Proposals 170, 171,172

Oppose

These are all unwarranted reactions that will not solve the stated problems, and create additional problems that affect broad segments of commercial, sport and subsistence users.

The most obvious problem that will result will be the threat to the economic viability of Alaskan communities that have a long and successful reliance on the benefits of salmon aquaculture programs in general.

The ongoing research regarding interactions between hatchery production of pink and chum salmon and wild stocks does not have the data to justify the proposed drastic reductions. This is especially true in light of the undeniable data that much the changing dynamics of salmon interactions, survival rates and carrying capacity are being driven by climatic variations and will be for the foreseeable future. To suggest that the above proposals will have any positive effect on the problems they intend to address detracts from a more logical and beneficial course of supporting ongoing research to improve continued salmon enhancement programs.

Proposals 164, 165

Support

These are common sense requirements that need to be implemented for habitat protection and salmon protection.

Proposals 175,180

Support

These are common sense requirements that protect king salmon.

Proposal 187

Oppose

This is a totally allocative proposal that essentially excludes a user group (setnet) from historical harvest without a logical justification. It has not been the practice of any previous board to allow one user group to essentially confiscate the entire harvest capacity of another user group. This displacement would establish an unheard of precedent for disenfranchisement of any user group from any fishery without cause.

Thankyou for your time.

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**Submitted by:** David Pace

**Community of Residence:** Idaho Falls, Idaho

I have been coming to Alaska as a sport fisher for over 20 years. I highly support Proposals 163, 164 and 165 to protect the halibut and salmon fisheries I come there to enjoy.

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March 2, 2026

Alaska Board of Fisheries  
 Marit Carlson-Van Dort, Chair  
 Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Oppose proposals 11, 163, 164, 165**

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Statewide Alaska Board of Fisheries (BOF) meeting in Anchorage. ***The Pacific Seafood Processors Association (PSPA) opposes Proposals 11, 163, and 164, and while we support the concept of Proposal 165, it also cannot be implemented as written at this time.*** PSPA is a nonprofit trade association comprised of major Alaska seafood processing companies that operate 50 facilities in 22 coastal communities across Alaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include shore-based processors that serve fleets dependent on state salmon, cod, and pollock fisheries in Prince William Sound, Kodiak, and Western Gulf communities like False Pass, Sand Point, and King Cove.

***Overall, the proposals create requirements for which ADFG does not have current authority, for which significant state funding would be necessary, and/or for technologies which do not currently exist. We note the Department opposes Proposals 163 – 165 and also identifies where some issues are being addressed at the North Pacific Fishery Management Council.***

Proposal 163 would redefine all pelagic trawl gear to be bottom trawl gear and then require ADFG on a case-by-case basis to come up with standards for pelagic gear, monitoring practices to ensure vessels meet that standard, and an application process for each vessel. Proposal 164 would require ADFG to develop an as of yet undefined seafloor contact detection system and then pollock (pelagic gear) vessels to use it while in state waters. The proposal mentions bottom sensors and electronic monitoring. Proposal 165 would require salmon excluders and require ADFG to establish performance-based criteria for excluder devices, maintain a list of approved excluders based on field testing and scientific review; and implement a compliance timeline and outreach strategy. Proposal 11 is a separate proposal affecting Aleutian Islands fisheries and we do not address it here more than to say it seems unnecessary. There are so few vessels participating (1 – 2), if there is a concern with fishing location it could easily be solved outside of the BOF process and without closing a fishery that could affect Adak and Atka.

These proposals infer that much of state waters are highly impacted by trawl gear. Less than 1% of state waters are fished with trawl gear and you can review the ADFG website and other sources to understand how the vast majority of state waters are closed to trawling (and of what remains, much is rocky benthic habitat that would destroy trawl gear if it had significant bottom contact). Proposals 163 –

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165 seem unaware of the regulations for and management of trawl fisheries, the current fisheries that are open to trawling, or how smaller trawl vessels, including those under <58', operate differently than larger vessels. In addition, these fisheries operate in state waters for a short period of time during the year but are historically important parts of a fishing economy in these small communities that are struggling to retain the infrastructure, jobs, schools, and tax base that allow Alaskans to continue to live there. These proposals primarily affect the state-managed PWS pollock fishery, and the Kodiak and Western Gulf of Alaska pollock fisheries (majority of vessels are <58'), where the limited areas and openings in state waters are in conjunction with federal fisheries and subject to all the same rules and monitoring. ***Please refer to the ADFG comments to understand the scale of the state water portion of these fisheries. While small, the state water portion is extremely important to the vessels that participate, given the location of the fish and the safety needs of smaller vessels in bad weather.***

Per Proposals 163 – 165, they are very vague on what they want the Department to do in terms of developing new monitoring standards or requirements. **As the Board has reviewed previously, ADFG does not currently have the authority to require electronic monitoring (cameras/sensors<sup>1</sup>) under state law, even when the fleet has said they could voluntarily leave their EM systems on in PWS.** Many of the Gulf vessels at issue already have EM (camera) systems they use when in Federal waters, and NOAA reviews the data to ensure compliance with full retention requirements at-sea so all fish and bycatch can be accounted for by observers at the shoreside plant. In addition, significant state funding would be needed to both conduct the Department field testing required of the proposals and review any collected data 'to support compliance enforcement.' Data review is the most expensive part of existing EM programs, with programs currently in place for federal pollock fisheries in both the Gulf of Alaska and Bering Sea and for the longline and pot halibut and sablefish fisheries that are each in the realm of \$1 million annually to operate, excluding all hardware costs.

The requirement for salmon excluders is positive in concept, but the ADFG comments note it is inactionable at this time to conduct the requirements outlined in that proposal. ***It is also important to know that many in these fleets already use salmon excluders, in both federal and state waters, but there is not currently a standard salmon excluder that works on all <58' vessels which have a lot less horsepower.*** Excluders are tested in flume tanks and in the field extensively prior to use, to ensure there are no unintended consequences and the excluder works effectively. What works for a large Bering Sea vessel (where excluders are required) does not work for a <58' vessel, and previous experimentation by the Western Gulf fleet has found for some smaller vessels more salmon are escaping without an excluder than with it. The western Gulf pollock fleet continues to test salmon excluders that are effective on small boats.

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<sup>1</sup>Sensor technology to accurately detect bottom contact in a commercial fisheries setting does not exist. It is possible in a research setting, but not in a commercial setting. These technologies are continually being tested by fleets in the Bering Sea, and a review of available systems shows they 1) either lack the resolution to provide discrete measurements of the gear's distance from the seafloor; 2) are highly susceptible to interference from water currents and debris, which can result in inaccurate data and potentially mislead captains in adjusting their nets; or 3) lack durability for a commercial setting. Current sensor technology does not hold up in a commercial setting where gear is continually hauled onboard (the sensors pop off), but new technology continues to be tested.

Finally, the proposals assume having bottom contact via pelagic gear has a substantial negative impact. There is no evidence to support that assumption. Essential fish habitat impacts of all gear types are evaluated comprehensively through a peer-reviewed NOAA process every five years. This federal requirement<sup>2</sup> estimates bottom contact of all gear types and uses that and other characteristics to determine whether fishing activity has an impact on habitat that is 'more than minimal and not temporary in nature'. The pollock trawl fisheries have been formally determined by NOAA not to have more than a minimal or temporary impact on essential fish habitat by the NOAA scientists and stock assessment authors responsible for these determinations. The most recent EFH evaluation was completed in 2023. The next one is already ongoing, and NOAA will update fishery impacts using recent data and improvements to the fishing effects model, which is nationally peer-reviewed and recognized as supporting the most comprehensive essential fish habitat review in the U.S.

**Proposals 163 – 165 affect small Gulf of Alaska pollock fisheries in state waters, in which all fish are delivered into Alaska communities and provide jobs, income, and fish tax revenue in those communities.** These are fisheries where young people are getting involved and preparing for business succession from those ready to retire. Prohibiting pollock fishing in state waters through the proposals' approach of setting regulations that the Department could not truly implement (and thus no one could comply with) is arbitrary and harmful.

Thank you for the opportunity to comment.



Julie Decker, President, PSPA  
Wrangell, Alaska

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<sup>2</sup> Section 303(a)(7) of the MSA and 50 CFR 600.815(a)(2).



March 2, 2026

Alaska Board of Fisheries  
 Marit Carlson-Van Dort, Chair  
 Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Oppose proposals 170 - 172**

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Statewide Alaska Board of Fisheries (BOF) meeting in Anchorage. ***The Pacific Seafood Processors Association (PSPA) opposes proposals 170 – 172.***

PSPA is a nonprofit trade association comprised of major Alaska seafood processing companies that operate 50 facilities in 22 coastal communities across Alaska. PSPA member companies have historically participated in and are fully dependent on salmon fisheries and the salmon enhancement program in Alaska, including processing plants located in Kodiak, Cordova, Valdez, and Yakutat, Sitka, Petersburg, Wrangell, Craig, and Ketchikan. They have been at the forefront of supporting management systems based on sound science and sustainability principles and have invested heavily in infrastructure and operations in Alaska’s remote communities to buy, process, and market salmon from Alaska fishermen.

Alaska’s unique salmon fisheries enhancement program is critical to the stability of the fishery-dependent communities and processing infrastructure in Southeast, Prince William Sound (PWS), and Kodiak, as well as the charter, sport, and subsistence opportunities for thousands of Alaskans. ***PSPA opposes Proposals 170 and 171 which would arbitrarily reduce hatchery production for no identified specific benefit or management objective but would cause direct harm to thousands of fishing and processing businesses, communities, and recreational, personal use, and subsistence fishermen.***

***We also oppose Proposal 172, to cap hatchery and pink and chum salmon egg take level, statewide, at the capacity permitted in 2025. These proposals undermine ADFG’s responsibility and authority in hatchery permitting, and Proposal 172 is unnecessary for all practical purposes (the permitted capacity of pink and chum salmon has remained the same since 2019). We note ADFG opposes all three proposals.***

Hatchery Benefits to Commercial, Sport & Subsistence

Hatcheries across Alaska are critically important to both fishermen and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon. Processors need the volume of salmon to stay viable and operational for all fisheries, and hatcheries continue as a supplement to wild stocks as they were intended. **Alaska’s salmon hatcheries contribute 20% of the value of our state’s salmon harvests and generate \$576 million in economic output, with impacts**

**throughout the economy.**<sup>1</sup> More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska’s salmon hatchery production. In addition, more than 270,000 hatchery-origin salmon are harvested annually in sport and related fisheries, and these numbers are considered conservative (McDowell, 2018). **In Prince William Sound alone, hatcheries have supplied over 1 million fish to Alaskans for personal use and subsistence.**

Hatchery pink and chum salmon are crucial for processors in Southeast and PWS because they provide the additional volume and stability needed to keep plants operating. In this way seafood processors remain viable and provide markets not just for salmon fishermen, but for all other commercial fisheries as well. Processors and harvesters have made significant long-term investments in processing plants and their fishing businesses, respectively, based on fisheries enhancement programs and permitted production decisions. In addition, tenders, support vessels, support businesses, transportation companies, sportfish businesses, and community governments (through both state and local fish taxes) are dependent on the direct and indirect economic activity that the hatchery programs provide.

#### Alaska’s Hatcheries are Different than the Lower 48

Hatcheries were established differently in Alaska with significant and necessary precautionary restrictions in the form of Alaska’s Sustainable Salmon Policy and Genetic Policy. These enhancement programs have been historically supported by the State for the benefit of all Alaskans – subsistence, personal use, sport, commercial. We appreciate the BOF’s interest in the long-term research that is almost concluded through the Alaska Hatchery Research Project, as it is at the forefront of our understanding of local impacts of pink and chum salmon hatcheries in Southeast and PWS, as implemented under the precautionary policies established by the State to protect wild stocks.

The State of Alaska established the hatchery program in 1971—at a time when Alaska’s salmon returns were at historic lows—to provide for more stable salmon harvests and bolster the economies of coastal communities that would not otherwise have viable economies. Since the beginning, the hatchery program was designed to supplement natural reproduction, not replace it, and to minimize negative interactions with naturally occurring populations of salmon. A testament to this design is that wild pink and chum salmon returns in these regions greatly improved since the inception of the program, and the data show that trends in wild and hatchery runs are consistent. When wild salmon runs are up, hatchery returns are up; when wild salmon runs are down, hatchery returns are down. PSPA supports a strong hatchery program consistent with the Department and the Board’s sustainable salmon policy.

#### Proposals 170 – 172

Proposals 170 – 172 should be rejected because they seek to reduce or limit chum and pink salmon hatchery production unnecessarily through regulation and would significantly harm Alaska salmon users of all sectors, despite a lack of evidence that Alaska hatcheries are harming wild fish production. Straying occurs naturally in both wild and hatchery-origin pink salmon stocks and attempts to determine acceptable levels of straying should consider a genetic propensity to stray, recognition that the stock, species, and environmental conditions influence stray rates, and produce credible research on the impact of straying on the productivity of wild stocks. These are exactly the types of questions the state’s Alaska Hatchery Research Project is addressing and for which they are starting to understand and communicate results. This long-term project is an example of the type of robust studies needed to

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<sup>1</sup>McKinley Research Group (2024). Update of The Economic Impact of Alaska’s Salmon Hatcheries.

understand impacts, focused primarily on the extent and annual variability in straying of hatchery pink salmon in Prince William Sound and chum salmon in PWS and Southeast Alaska and the impact of that straying on the productivity of wild stocks. This project was the State of Alaska's commitment to and investment in research to ensure hatchery production is compatible with sustainable productivity of wild stocks.

Uncertainty regarding impacts will always exist, even after the conclusion of the State's hatchery research program. We depend on the BOF to weigh this uncertainty against the known harms and the scale of impact when considering any management action. Precaution is built into Alaska's enhancement program at all levels, so citing 'a precautionary approach' via these proposals that create so much certain harm to Alaskans is not defensible. In this case, the balance clearly shows that the harm from Proposals 170 – 172 is certain and significant, while the benefits of the proposals are entirely undemonstrated.

The hatchery program has been an incredible, long-term investment by the State of Alaska for Alaskans. The dependence on the hatchery program is clear from both objective analysis and overwhelming public and regional stakeholder support for the program conveyed at your July 2018 meeting, the October 2018 work session, the December 2024 PWS meeting, the January 2025 Southeast meeting, and several Hatchery Committee meetings. Yet these proposals continue to come before the BOF with no more merit or substance provided than at previous meetings.

Please oppose proposals 170 - 172, given they have no scientific justification and serve to directly harm Alaska's salmon dependent businesses, recreational, personal use, and subsistence fishermen.

Thank you for the opportunity to comment.



Julie Decker, President, PSPA  
Wrangell, AK



March 2, 2026

Alaska Board of Fisheries  
 Marit Carlson-Van Dort, Chair  
 Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Oppose Proposal 186**

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Statewide Alaska Board of Fisheries (BOF) meeting in Anchorage. The Pacific Seafood Processors Association (PSPA) is a nonprofit trade association comprised of major Alaska seafood processing companies that operate 50 facilities in 22 coastal communities across Alaska. PSPA member companies have historically participated in and are fully dependent on commercial salmon fisheries across the state, including on the Kenai Peninsula. **PSPA opposes Proposal 186 to change the Central District Drift Gillnet Fishery Management Plan and further restrict the commercial drift gillnet fishery out of cycle.** We oppose the proposal for the following reasons:

- The significance of the impact (closing the largest state waters district in Upper Cook Inlet in July) and allocative nature of the proposal warrant reviewing it in cycle, at the time other relevant proposals are being deliberated. This proposal should not have been accepted as an ACR as ADFG determined it did not meet the criteria, and the Board will be reviewing all Cook Inlet escapement goals and stock of concern recommendations in October, prior to the 2027 cycle. As noted in ADFG comments, this plan consistently receives multiple proposals in cycle.
- The stated purpose of the proposal is to conserve coho salmon returning to the Deshka and Little Susitna Rivers in Northern Cook Inlet so they can be harvested in the sportfish fishery, but the management plan itself is not tied in any way to coho abundance. The proposal creates a permanent closure without the ability to adjust time or area in response to actual coho harvests or escapement.
- The Deshka River and Little Susitna River weir counts have been incomplete in recent years due to high water (since 2020 and 2021, respectively) and represent a minimum count, or underestimate. We understand monitoring coho salmon presents many challenges to obtain consistent and complete run information. But note the two coho index streams in Northern

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Cook Inlet that were able to be fully counted in recent years (Fish Creek and Jim Creek) have met or exceeded escapement.<sup>1</sup>

- In February, the North Pacific Fishery Management Council set a low coho salmon TAC for the EEZ portion of Upper Cook inlet of 16,619, which is 75% below the preseason overfishing limit (and with an additional 38% buffer greater than recommended by the Science and Statistical Committee). The EEZ will close earlier than the August 15 regulatory closure if any salmon TAC is reached. ***Proposal 186, in combination with this low coho limit in the EEZ, could effectively close the entire lower half of the Upper Cook Inlet to commercial fishing at or just after the peak of the sockeye run.*** This is at a time when this region needs commercial opportunity, and we are already significantly over-escaping sockeye<sup>2</sup> with another large run forecasted for 2026 (7.6 million sockeye run for Upper Cook Inlet with 5.6 million available for harvest).

Please oppose Proposal 186 and allow these types of significant actions to be deliberated in cycle, and after the Board's October Work Session in which you receive escapement goal and stock of concern recommendations from ADFG.

Thank you for the opportunity to comment.

Sincerely,



Julie Decker, President, PSPA  
Wrangell, AK

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<sup>1</sup> ADF&G (Alaska Department of Fish and Game). 2026. Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals for statewide finfish and supplemental issues, Alaska Board of Fisheries meeting Anchorage, Alaska, March 17–21, 2026. Alaska Department of Fish and Game, Regional Information Report No. 5J26-03, Anchorage.

<sup>2</sup> In 2025, approximately 4.25 million sockeye were estimated to have passed the river mile 19 sonar, which is the highest count on record. The preliminary escapement of 3.85 million is estimated using the 5-year average sport fishery harvest upstream of the sonar and exceeds the SEG of 750,000–1,300,000 fish (Table 186-12).



**Submitted by:** Robert Papai

**Community of Residence:** Homer, AK

proposal 176.

I support this proposal 100%. A cumulative bag limit for all vessels statewide is a huge step in the right direction for conservation efforts. Upon my first charters here in Homer last season, I was made aware of a "no party fishing" regulation and I was simply baffled. Confused by the regulation and the purpose it serves. With this current regulation in place, it is illegal for me or anyone else to assist an angler who needs assistance. Including but not limited to elderly, children, handicapped anglers who need extra assistance to hook and land fish.

This current regulation hurts the fish as well. Not simply one species or the other. It's all of them. Particularly the rockfish and halibut. I can't count the number of halibut and rockfish that were released by myself last year alone due to this regulation. Picture this...6 anglers on the charter boat. 5 of these anglers have caught and kept their halibut under 27". We keep fishing to get this one guy his limit as well. The other 5 people are either still fishing and releasing halibut or just waiting on this one guy. This one guy has now caught and released 8 more halibut all just over the 27" limit all while a few others are forced to throw back the 26" halibut they just boated. This regulation forces us to harass more fish than intended to successfully obtain a limit. And that is just the fish I have mentioned. Now let's list the other things that go to waste here. Time, energy (both human and the fish), fuel, bait, tackle, etc.

I feel this regulation was put in place to be more conservative of our fishery but in fact it is the exact opposite and is doing more harm than good!

proposal 183

I am against the retaining of carcasses. Keeping the under 27" halibut carcasses is bad enough. I feel the facilities here in Homer will not be able to keep up with the demand. The carcass bins would be overloaded if we had to keep the rockfish carcasses too. There is just no need to keep rockfish carcasses here in Homer. They are messy, spiny and scaly. I leave the skin on them when I fillet them and that is all a game officer or anyone else should need for an accurate fish identification. The amount of unnecessary effort this will create to our already exhausting workday is ridiculous. If you feel this is an issue in and can assist enforcement in another region then please specify that in the regulations. This would simply be a further nuisance in the Homer fishery and Homer harbor.

not proposed but something I would like to see happen.

Resident CHP holders with Resident Sportfishing guides operating the vessels should be able to WORK and retain halibut 7 days a week. Those of us who earn zero income in other states. Those of us who live here year-round so we can fish/work the 3-4 month very short season. Those of us who remain in our local community and contribute to the off-season efforts should be rewarded greater than less expensive fishing licenses and a few more fish retained annually. We should be allowed to fish every day we can to help us financially get thru the long winter months.

I am all for the daily closures on halibut for non-resident guides only. Nonresident CHP holders as well. Guys that own a cabin here and claim residency but live in their house in Florida 6-8 months a year and have a resident Florida license too.... hmmm

I am not asking to punish nonresidents. We need them to come here and work. I am simply asking to be more rewarded for staying year-round and working a minimal winter job because we are needed too. The season here is short enough as it is. The weather limits us enough, Gods work! Let the locals work every day the weather allows.

Thanks, y'all have a great day!

Captain Bobby Papai

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Casey Pape. I am a commercial fisherman in Area E (seiner) and fish aboard the R/V Montague out of Cordova, Alaska.

Reducing hatchery production would have a severe negative impact on my business and livelihood. It would make the profitability of my operation—and the broader community—so marginal that it will be difficult to remain in the region. It would also deter future investment: when regulatory decisions remove predictability from natural resource management, families and businesses cannot confidently invest in Alaska.

In a global commodity market shaped by large-scale farmed production, Alaska's coastal fishing families rely on stable, science-led management to remain competitive and viable. These proposals would undercut that stability without demonstrating measurable benefits.

I don't know how to navigate investing in my state when confronted by a board of fisheries that is so obviously against in-shore small fishing families. Look to case studies of Grand Banks Cod as an example. It is always easier and more convenient to regulate in-shore small fishing family businesses than do the hard work of regulating off-shore large corporations fishing Alaska EEZ.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172. Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Casey Pape  
Cordova, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kellan Patrick, and I am a commercial fisherman and seine vessel owner in Ketchikan, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If adopted, these proposals would negatively affect my business. I might go out of business entirely.

People would lose jobs, and many would have no other skills to find any other employment.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

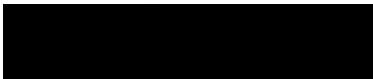
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kellan Patrick  
Ketchikan, Alaska



**Submitted by:** Nate Patsos

**Community of Residence:** Soldotna, AK

I am opposed to proposal 175. A change in dipnet mesh size would be an unnecessary expense for all fisherman without a clear conservation goal. Specifically not allowing the use of a rope would disproportionately negatively affect the ability for the young, elderly, and commercial participants to harvest fish. Conservation of certain fish stocks is better achieved by regulating dipnet fishing opportunity in specific areas as necessary. Also, securing a dipnet to the boat with a rope prevents the net from being dropped and lost and becoming a hazard in the waterway.

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**Submitted by:** Wayland Patten

**Community of Residence:** Craig AK

I strongly oppose prop:171 and prop:172

Hatchery salmon both directly and indirectly put food on my table as well as fisherman taxes that go to the school systems these small towns desperately need.

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**Submitted by:** Wyatt Patten

**Community of Residence:** Craig

I strongly appose prop. 171 & prop 172.

Hatcheries are critical coastal infrastructure. They support food security, fishing opportunity, processing capacity, harbor activity, and year-round jobs across Alaska.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Wyatt Patten, and I am a commercial fisherman based in Craig, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would severely reduce my income in an already struggling industry. In some seasons, hatchery salmon make up over 50 percent of my gross stock. Without hatchery salmon, my operation would not be economically feasible. I employ my family and other local fishermen, who also have families of their own, from the Prince of Wales area, and we rely on hatchery salmon in the summer to feed, clothe, and keep a roof over our families' heads.

Hatcheries are not just for commercial fishing. They also provide many subsistence-qualified users an opportunity to harvest salmon every year. Klawock residents rely on hatchery coho every year for their subsistence needs. The ripple effect goes far beyond the dollar bill.

Without hatchery production, the risks include food insecurity, income insecurity, and the diminished quality of cultural practices such as catching, processing, and sharing salmon.

Protecting stocks of concern is a major factor in how and when we fish. Hatcheries provide directed fishing opportunity without interfering with stocks of concern.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Wyatt Patten  
Craig, Alaska



**Submitted by:** Jeremiah Pavlik

**Community of Residence:** Yakutat

5 AAC 30.320. Fishing periods, 5 AAC 30.331. Gillnet specifications and operations, and 5 AAC 30.350. Closed waters.

As a lifelong subsistence, commercial, and sports fisherman, I strongly OPPOSE proposal 187, which aims to remove commercial fishing from the Tsiu River.

Historically, ADF&G has done well managing this dynamic system with far less extreme measures. Their existing management tools have been successful. The Tsiu River meets/exceeds escapement goals every single year, even on the years with maximum sports and commercial fishing effort occurring simultaneously. This coho run is an abundant resource. There is no legitimate biological concern for the stock based on the current movement of the mouth. This change has been anticipated for quite some time and is not at all a new phenomenon.

The Tsiu River is significant to the traditional Native population of Yakutat, including my family. Several Alaska Native families own allotments adjacent to the Tsiu and Kaliahk rivers. Passing this proposal would negatively impact these families and all commercial fishing families of Yakutat for generations. The cultural effects of removing commercial fishing at Tsiu River would be overwhelmingly negative.

In years when fish transportation flights were available, the Tsiu River commercial setnet fishery accounted for a very significant portion of the overall coho catch in the Yakutat district. It is economically valuable to the Borough and to the people who reside there. For many fisherman, this commercial fishery makes up the majority of our setnet income. We cannot afford to lose more fishing grounds.

Furthermore, proposal 187 is out of cycle for the Yakutat area and, from my understanding, fails to meet the guidelines required to be admitted into the proposal book at this time, as it does not clearly represent an unexpected emergency that threatens the longevity of the stock. This proposal simply illustrates one user group's ongoing attempt to remove the other groups for personal gain. The proposer has repeatedly submitted proposals with this goal. It would be completely unjust to reallocate this bountiful resource to out-of-state tourism. Adopting this proposal would set a dangerous precedence as it is a direct assault on our way of life as rural Alaskans.

Please vote NO on proposal 187.

These drastic conservation measures are unjustified at this time. The existing strategies used by the Department are sufficient to address the current morphological changes.

- Jeremiah Pavlik

**Submitted by:** Jessica Pavlik

**Community of Residence:** Yakutat

Opposition to Proposal 187 - TSIU RIVER

5 AAC 30.320. Fishing periods, 5 AAC 30.331. Gillnet specifications and operations, and 5 AAC 30.350. Closed waters.

My name is Jessica. I am from Oregon originally but I grew up sports fishing out of Yakutat in the Summer months. I am now a year round resident of Yakutat. In addition to sports and subsistence fishing, I have also been participating in several commercial fisheries for the last 10 years.

My first trip to the Tsiu River was in 2015. I was flown up by the late Hans Munich, of Yakutat Coastal Airlines, to meet my now-husband. After setting foot outside of the plane, with no idea where to go, I was greeted by



another commercial fisherman whom I didn't know. She wore waders, drove a 4-wheeler, and to my surprise, she packed her baby around with her. She loaded my stuff up and hauled me off to camp to start one of the most impactful trips of my life.

Yakutat has been commercial fishing in the Tsiu area for generations, some by skiff but many by hand. The commercial season is short and fishing days are limited, not because of the run size, but because of the logistics of moving fish by air. My husband and the other commercial fisherman worked exceptionally hard to catch the fish, coordinate flights, and load the fish into planes to be shipped out. Not to mention the effort it takes just to live out of a fish camp in remote Alaska wilderness. Between the overly friendly bears stealing your gear, the wild wind storms that bury everything in sight, the long 4-wheeler rides to and from duck hunting grounds when food is scarce... We truly pour our souls into this fishery, as our parents did before us and as our children will after us.

Losing these fishing grounds would be devastating to my family and many others, including the families who own Native Allotment land nearby. I am asking that you please take all of us into consideration in your conversations surrounding this topic, and that you ultimately vote NO on proposal 187 and any associated proposals that seek to shut down this multi-generational fishery.

Respectfully,

Jessica Pavlik

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PC376

**Submitted by:** Layla Pavlik

**Community of Residence:** Yakutat

My name is Layla Pavlik,

And I grew up as 3rd generation fisherman at Tsiu beginning at the young age of maybe 8-9 years old. I always remember looking forward to see my Father at the river because this river was so important to us as family. My Dad would be gone for my birthday in August almost every year. I would only be able to talk to him maybe once a day, but that never mattered because I knew I would be seeing him soon and be in Tsiu. It is one of my favorite places to this day. If you ask anyone who knows me well, I mention my life at the river as a child.

Not only did I get to see my dad thrive in an environment that made him who he is today, but it made me fall in love with all that the river and fishery could provide for us. I was able to experience and witness something that made all fisherman happy and most kids will never be able to experience. I hope one day that I will be able to provide my future children with the same opportunity as my father has been able to do for me.

Tsiu is once in a lifetime experience for anyone, whether you have fishing or hunting experience. To this day some of my first memories are getting ready to fly to the river to meet my dad. My sister and I would pack up all our fishing gear, toys, and any snacks we thought my dad would like as an extra special thing.<sup>[L]</sup><sub>[SEP]</sub>

Most kids my age (25) have no clue what life you can live there, from the amazing fishing that I was able to experience, the deck hand life of hauling the fish back to the buying shack, to hauling totes of ice back to the set just to turn around with another load, to being stormed in and not knowing when the river will be shut down. When no one can fish all of the locals come over and have a big dinner and just all talking about the good spots, the bad spots, the seals, and all that has been coming in it or whatever new change was happening that they had noticed.

Tsiu is a notoriously difficult river, from the inconsistent Fall weather storms, to the tides making it unfishable even though it may have been an opener. Those who chose it didn't always want to choose it, but because it was our last option for make money for the winter. Not everyone had the choice to fly back every time we knew that the river would be closed or that the weather would make it so that we could not fish, but we made that choice because of the love that we have for the fishery but the love we have for the river itself as a home.

To lose the opportunity to be able to take my future family to Tsiu would be losing a part of my home.

Not only is this river beyond comparison for any fishing for anyone but it is also a second home to many of us. You would be taking away our traditional home lands and rights. Please think of our future generations that will not be able to experience their own traditional rights.

Thank you for considering my comment, Layla Pavlik, an 8 year old who fell in love with what her home can provide.

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PC377

**Submitted by:** Dale Pedersen

**Community of Residence:** Sand Point

Chair Van Dort and board members, I am writing this in opposition to proposals 163 and 164 for the sole reason of trying to explain to you that where we fish and why we fish there is a good thing. If you force us outside of our traditional tow areas we are guaranteed to catch more king salmon in our pollock fishery. We have been fishing in these areas for more than 30 years for a reason. And that reason is because there's less bycatch when we fish there. We have basically one tow for A season and another different area for B season. If you force us outside e us out of those areas we will get more bycatch. I really hate to say this but everything you as board members are doing is detrimental to the resource and doesn't make a bit of sense! Kinda like when board member Carpenter tried to explain how getting rid of the adaptive salmon management plan wasn't to smart.

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PC378

**Submitted by:** Grant Peel

**Community of Residence:** Homer

Grant Peel

Owner-Operator of Foxfire Fishing Charters out of Homer

Proposal 176 – Support

My name is Grant Peel. I am a charter owner-operator out of Homer, and I strongly support Proposal 176 as a practical measure to reduce discard mortality in both guided and unguided saltwater sport fisheries.

In a period of low abundance and elevated uncertainty across several stocks, cumulative vessel limits provide a more efficient and biologically responsible framework for harvest. By allowing anglers on the same vessel to pool their bag limits, the fleet can reduce unnecessary catch-and-release events once the total allowable harvest for the group has been achieved. Fewer releases translate directly into lower release mortality, particularly in fisheries with size limits.

The Department has expressed concern that vessel limits would alter angler behavior and increase retention. I believe this concern overstates the likely behavioral response. In my 11 years as a charter operator, when clients target a species under favorable conditions, the majority already retain their individual bag limit. The existing logbook structure does not capture angler intent, time spent targeting specific species, or the difference between targeted and incidental catch. Assuming that all retained fish reflect an angler behavioral shift rather than industry wide harvest pattern shift risks mischaracterizing the data.

A cumulative vessel limit would also provide the Department with an additional management tool. Rather than weakening management, it expands flexibility. If industry-wide fishing pressure shifts toward a particular species, the Board and Department could adjust vessel-level limits to moderate total harvest while maintaining angler opportunity. Other states, including Florida, use vessel limits as an overlay to individual limits to provide this type of control for a wide variety of species (Swordfish, Cobia, Blackfin Tuna, Mahi, Tarpon, African

Pompano, Barracuda, Sheepshead and Cubera Snapper among others). In practice, vessel limits can be set equal to or more restrictive than the aggregate of individual limits, depending on management objectives.

Enforcement may also become more straightforward. Instead of verifying compliance fish-by-fish with individual anglers, officers can evaluate compliance at the vessel level while annual limits and individual seasonal caps remain intact. The proposal does not eliminate individual annual limits.

Overall, Proposal 176 improves operational efficiency, reduces discard mortality, and provides the Department with an additional regulatory lever to manage harvest pressure when necessary. For these reasons, I urge the Board to adopt this measure.

Thanks for your consideration

Grant

#### Proposal 183 – Oppose

My name is Grant Peel. I am a charter owner-operator out of Homer, and I oppose Proposal 183 as it is written. Requiring carcass retention for all species of fish places an undue burden upon city and harbor facilities with limited benefit to ADFG samplers and enforcement.

As written, this proposal requires the retention of all fish carcasses (excepting pink salmon) citing the need for enforcement to verify the size requirements for certain species and for increased biological sampling. Requiring carcass retention by guided and unguided sport fisherman will not increase the sampling capacity by the department. As a charter vessel capable of carrying up to 22 anglers, I represent significant impact on the catch distribution of the Homer harbor. Despite this, my catch has not been biologically sampled in the past 3 years. This is not a criticism of port samplers, who work diligently, but rather an acknowledgment of limited departmental capacity. Increasing the volume of retained carcasses does not increase sampling effort without additional funding or personnel.

On the other side, the effects of this proposition on community resources are excessive. From 2021–2023, the Lower Cook Inlet charter fleet removed an average of 167,628 fish annually (Chinook, Coho, other salmon, halibut, pelagic and non-pelagic rockfish including yelloweye, and lingcod) based on saltwater charter logbook data. Requiring all these carcasses to be retained would dramatically increase carcass volume entering harbor waste systems.

This increased volume would quickly overwhelm city facilities like the Homer Harbor Fish Grinder and carcass trailers. It should be noted that these facilities were originally funded and installed because the city's prior disposal plan of dumping carcasses off the City Dock outside the Homer Harbor was deemed to exceed EPA limits for fish waste. Ultimately this proposal risks overwhelming local facilities and creating secondary environmental compliance issues at the municipal level.

If the Board's primary concern is verification of minimum length requirements or accurate species identification, a more targeted approach would be reasonable. Limiting this requirement to species with minimum length restrictions or documented identification challenges would achieve the enforcement objective without imposing unnecessary burdens across all species.

As written, this proposal creates broad operational and environmental consequences without demonstrable gains in sampling or enforcement efficiency. For these reasons, I respectfully urge the Board to reject Proposal 183 in its current form.

Thanks for your consideration,

Grant

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**Justin Peeler**

F/V Defiant

Defiant Fishing Company LLC

Po Box 184 Sitka Ak 99835



Chair Carlson-Van Dort, Members of the Alaska Board of Fisheries,

I am a second generation fisherman from Sitka Alaska and have been involved in the salmon, herring and crab fisheries in Alaska all my life. As well as many other net, pot and hook fisheries on the West Coast and Gulf of Alaska. I currently serve my gear group(seine) as a officer(Vice President) on the board of Directors for Southeast Alaska Seiners Association(SEAS). I am also a seine representative on the board of directors for Northern Southeast Regional Aquaculture Association(NSRAA) of which I currently serve as president and serve as a representative on the southeast regional planning team.

**Oppose proposal 170**

This proposal is a wide attack on Salmon enhancement and lacks any evidence of a problem besides opinion. Any problems if any, should be heard first thru the Regional Planning Team and the commissioner of Fish and Game. Were they can work in their region to solve any problems thru the best science available.

Such a wide attack would have huge ramifications to all Salmon users in Alaska not just Commercial. Many of the enhancement programs benefit sport, substance and personal use. A huge amount of our enhancement programs have direct implications with the Pacific Salmon Treaty and a cut of any kind would have a huge rippling effect.

I strongly urge you to recognize the system in place at the regional level to deal with any problems if any with are hatchery programs. We saw this very same proposal last year, nothing has changed. Those of you on the board last year saw a overwhelming amount of support for the hatcheries. I ask you to remember that. The story is still the same.

**Oppose proposal 171**

I do not believe the Board of Fish has the power to change egg take capacity. This topic should be addressed at the regional level and by the commissioner of Fish and Game who holds the power to do so.

**Oppose proposal 172**

This proposal is again a reach of power. The PnP hatcheries have not asked or been issued a new pink or chum salmon egg permit since having a agreement with the commissioner since 2019. This is a issue that should be dealt with at the regional level and in fact are. No reason for the BoF to undermine the commissioners power and the work done at the RPT level.

Sincerely,

Justin Peeler

A handwritten signature in black ink that reads "Justin Peeler".

March 2, 2026

Alaska Board of Fisheries  
Statewide March 2026 Meeting

**Re: Opposing Proposal's 163, 164, 165 & 11**

**Submitted by: John Moller on behalf of Peninsula Fishermen's Coalition**

**Chairman Carlson-Van Dort and Board Members:**

Peninsula Fishermen's Coalition (PFC) appreciates the opportunity to comment prior to the Statewide Alaska Board of Fisheries (BOF) meeting in Anchorage. PFC comprises 17 combination vessels 58 feet or less home ported in Sand Point and King Cove. The majority of this fleet are fishing during this meeting and have asked me to represent them. PFC opposes Proposals 11, 163, and 164; and recognizes the idea of Proposal 165, but does not believe it can be implemented as written.

PFC believes these proposals, if adopted, would create situations where ADFG lacks authority. The Department opposes Proposals 163, 164 and 165 and points out the North Pacific Fishery Management Council (Council) is currently addressing many of these issues. The state water and federal groundfish fisheries are interconnected (such as the Parallel fishery) and changes to one has nuanced impacts to all that may not be understood. For these reasons, **PFC believes the appropriate action by the Board of Fisheries is to NOT adopt these proposals. The Board can always request a Joint Protocol Committee meeting with the Council to better understand the potential impacts and report back to their respective bodies.**

Proposal 163 redefines pelagic trawl gear as bottom trawl gear and then asks ADFG to come up with standards and monitoring protocols to ensure vessels meet the standard. This is problematic, given the Departments limited authority.

Proposal 164, if adopted, requires ADFG to develop a seafloor contact detection system for pollock vessels to use while in state waters. The bottom sensors and electronic monitoring (EM) that this proposal suggests is problematic because ADFG currently does not have the authority to require EM under state law. Even if EM systems were allowed under state law, it is a very expensive proposition. Current EM programs that are required in federal fisheries cost about \$1M annually (for each fishery) for data collection alone. This does not include the cost of the cameras and other hardware needed for EM. That said, nearly 100% of PFC vessels currently operate EM systems and use electronic logbooks while fishing in federal and parallel fisheries for pollock.

Proposal 165 includes salmon excluders and requires ADFG to establish performance-based criteria for excluders. The proposal also requires ADFG maintain a list of approved excluders based on field testing and scientific review. Salmon excluders can be positive, but the ADFG

comment that it is "...inactionable to conduct the requirements outlined in the proposal..." is a compelling reason to not approve. Salmon excluders designed for smaller 58-foot vessels with lower horsepower (HP) are extremely limited. The success with salmon excluders by large trawlers, with much more HP, took years in development and millions of dollars testing in flume tanks. This is a necessary step to minimize unintended consequences. In fact, some reports show smaller vessels with no excluders have a lower salmon bycatch rate than those with excluders. That being said, the Western Gulf pollock fleet continues to test salmon excluders for effectiveness on their smaller boats.

Proposal 11 affects the Aleutian Islands (AI) fisheries and this matter is more appropriately solved outside of the BOF process and without closing fisheries impacting the AI communities of Adak and Atka. The PFC fleet has traditionally fished and delivered in the AI (when there was a processor in Adak) and if the opportunity presents itself again, would return. Adak needs to retain this opportunity to support a seafood processor.

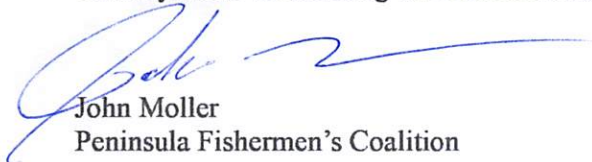
The majority of state waters are already closed to trawling. Proposals 163 – 165 appear unfamiliar with state water regulations that manage trawl fisheries and are not realistic given the Department's limitations in testing and developing such standards, in addition to the lack of authority to require EM. These state water fisheries are very short in duration but the importance to Alaskan fishermen and fisheries dependent coastal Alaskan communities like Sand Point, King Cove and False Pass, should not be underestimated. These communities cannot afford another hit to their economy and these proposals, if adopted WILL contribute to more instability. Furthermore, Proposals, 163 and 164 have the potential of forcing the small boat fleet based out of King Cove and Sand Point into unsheltered waters, risking their safety.

The proposals, with no science to support them, assume bottom contact with pelagic gear has a substantial negative impact. NOAA, through its scientists and stock assessment authors determination is the pollock trawl fisheries have a minimal or temporary impact on essential fish habitat. NOAA's determination is contrary to these proposals.

In sum, all of these proposals have negative effects to Alaska, coastal Alaska communities, and fleets with little to no documented benefits, would require significant State funding to implement, and lack both detail and authority to move ahead.

Lastly, the state water and federal groundfish fisheries are interconnected (such as the Parallel fishery) and changes to one has nuanced impacts that may not be understood. For these reasons, we believe **the appropriate action by the Board of Fisheries is to vote to NOT adopt Proposals 11, 163, 164 & 165. The Board could request a Joint Protocol Committee meeting with the NPFMC to better understand the potential impacts of such actions and report back to their respective bodies.**

Thank you for considering our recommendations.



John Moller  
Peninsula Fishermen's Coalition

**Submitted by:** Terry Perensovich

**Community of Residence:** Sitka

Dear Members of the Board,

I am writing in support of proposals 163,164, and165. Alaska state law needs better clarification to define when “pelagic” trawls make bottom contact.

I fish a longline skiff for Halibut. I also operate a troller for Salmon in Southeast. Fishing cleanly is important to protect habitat and avoid bycatch of non target species. I urge you to adopt these measures to clean up the trawl industry.

Thank you for this opportunity to comment,

Terry Perensovich

---

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Eduardo Perez. I am a commercial fisherman in Kodiak, Alaska and own two fishing vessels that crab, cod, and salmon seine through El Caporal LLC and VeroVictoria LLC.

Kodiak depends heavily on its hatchery for pink salmon, chum, sockeye, and coho. A decrease in fry releases or a shutdown would have drastic impacts on the salmon fleet. It would increase pressure on already struggling wild stocks and cause loss of revenue to vessels, crews, processors, and the City of Kodiak through landing taxes.

Hatcheries have existed for many years and are a fundamental part of how our fleet operates. Reducing production will increase crowding in wild stock areas and reduce fishing time when escapement goals are not met.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Eduardo Perez  
Kodiak, Alaska







March 2, 2026

Alaska Board of Fisheries  
Board Support Section  
ATTN: BOF Comments  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: Opposition to proposals 168, 170-172. Support for proposal 169.

Dear Chair Carlson Van-Dort,

Petersburg Vessel Owners Association (PVOA) represents a fleet of mixed gear vessels that operate in State and Federal fisheries in Alaska and the West Coast. PVOA's members participate in fisheries of all gear types and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken positions on the following proposals for the March 17-21 Statewide Finfish and Supplemental Issues meeting.

Proposal 168 - **OPPOSE**

PVOA is Opposed to Proposal 168. PVOA understands that this proposal stemmed from gear use issues in one specific region and would instead suggest that it be brought up again in the correct in cycle meeting, rather than make it a statewide proposal. PVOA sees this proposal as well intentioned but the statewide implications go beyond what we understand to be the intent and would likely bring about operational harm if implemented statewide.

Proposal 169 - **SUPPORT**

PVOA Supports proposal 169. Slinky pots have rapidly grown in popularity for their effectiveness and the ability for both small and large vessels to harvest sablefish with pots rather than hooks. Slinky pots are a legal gear in many groundfish fisheries in the state, yet there is no definition for the gear type. PVOA sees this as a responsible and necessary definition to update regulations of a popular and widely adopted gear type.

#### Proposals 170-172 - **OPPOSE**

PVOA Opposes proposals 170-172. While PVOA opposes proposals looking to restrict hatchery output and production in the State, we do appreciate the Board's decision to take up hatchery specific proposals at the Statewide Finfish meetings rather than continue to see them at every region specific finfish meeting. That being said, our position has not changed and PVOA believes that the Board of Fisheries is not the correct venue for hatchery management, that is instead the Regional Plan Team (RPT) process. The RPT process allows stakeholders and the Department an opportunity to look prescriptively at each hatchery site and function to determine if changes need to be made. Attempts to change hatchery production and output through the Board of Fisheries loses the nuanced and prescriptive approach that we already have in place. PVOA represents fishermen and vessels that participate in salmon fisheries throughout the State, most all of which benefit from the State's salmon hatchery programs.

Alaska's salmon hatcheries have been in operation for 50 years, using a scientifically based management framework to eliminate harm on the natural stocks in the shared waterways. When established, hatcheries are required to be situated in areas with no natural salmon streams that they could impact, but take their initial brood stock from the nearest salmon systems so that in the occurrence of straying, the genetic makeup of the systems are not impacted.

While there is no evidence that hatcheries impact the surrounding salmon stocks, the impacts of reducing hatchery egg take and production would be felt immediately by the fishermen and communities that rely on commercial salmon fishing, the majority of Coastal Alaska. A reduction in hatchery production would reduce fishermen's income, reduce fish tax revenue to communities, put more pressure on wild stocks in the same region and likely lead to a decrease in chinook, coho and sockeye hatchery output due to the cost of rearing those species as a cost cutting measure for hatcheries. Reducing hatchery production with no sound ecological or stock driven needs will put people out of business and harm Coastal Alaskan communities.

Petersburg Vessel Owners Association thanks the Board of Fisheries for the opportunity to comment on proposals for the upcoming March 17 - 21 Statewide Finfish and Supplemental Issues meeting. We look forward to answering any questions that Board Members may have in regards to our comments.

Thank you,

A handwritten signature in cursive script that reads "Nels Evens".

Nels Evens,

Executive Director,

Petersburg Vessel Owners Association

PC384

**Submitted by:** Matt Peterson

**Community of Residence:** Wasilla

I'm writing in support of proposal 186. I have been a fisherman of the Little Su since 1982 when I was 3 years old. My first year out of High School I started guiding in 1996 and here I am going into year 30 as a guide, every year on the Little Su. I have seen that river when salmon fishing was at its best and now not being able to catch a king due to, in my opinion, mismanagement. I can see a trend in the Coho's following in the same direction as the Chinooks. My son who is 18 will be starting his first year of guiding this year and his livelihood will be short lived if we don't do something about it. Please strongly consider proposal 186 to be in effect as soon as possible so the Little Su can still be a fishable river for years to come.

---

PC385

**Submitted by:** Bryon Pfundt

**Community of Residence:** Petersburg

Proposals 170,171,172

I oppose proposals 170-172. These proposals seem very broad brush in their approach. This could very well lead to unintended harmful consequences. My experience working in the RPT process in years past has shown me that this is the place where these types of concerns can be fully evaluated in regard to that specific project.

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PC386

**Submitted by:** Tuayan Phillip

**Community of Residence:** Anchorage

Opposing proposal 162 and 175

175 Bans 4 1/2" mesh nets and tying nets off to boats will severely affect elderly or handicapped people from being able to enjoy the beauty of subsistence and living off the land.

162 affects the ability for all people to traverse the copper river where in many places can only be accessed through boat access which is not affordable to many Alaskans.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Greg Phillips, and I am a commercial fisherman in Southeast Alaska. I operate the F/V La Nina under Phillips Fisheries LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would severely affect the livelihood of myself and my crew. They would reduce harvest opportunities, processing jobs, food availability, and local opportunities for subsistence and sport fishing.

These proposals represent opinion-based, self-interested action, not science-based, community-serving policy. I do not believe that hatcheries are contributing to ocean biomass decline or any negative outcomes in the marine ecosystem because I have not seen scientific proof. Hatcheries are essential to sustaining our fishery.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Greg Phillips

**Submitted by:** Larry Platt

**Community of Residence:** Gustavus

Larry Platt Gustavus Alaska

My comments are I think proposals 163 to 165

My 2 cents. I do not want trawl to be able to fish within 3 miles of shore. I do not want trawl to exist. Ban Trawling forever! The fishing in my neck of the woods has been depleted during the 35 years I've lived here. Is it trawl? Is it ocean warming? Is it pollution? I don't know. What I do know is that Trawl wastes tons of fish and that kind of operation needs to go bye bye. Add up all the possible culprits and end them all. It's getting bad guys and nobody is doing anything about it. Quit protecting this fishery for the money. That is the problem.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brooke Poirot, and I am a commercial fisherman based in Homer, Alaska. I operate the F/V Brooklyn.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals threaten my livelihood and income stability. They would also affect my winter employment building and repairing seines.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Brooke Poirot  
Homer, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Stacy Poppe, and I am a commercial fisherman based in Juneau, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. We are raising our family to be future fishermen, and we rely on the hatcheries for a continued fishery and a stable income. The communities in our region rely heavily on hatchery fish, and these proposals could be detrimental to their future. Fewer fish returning means fewer opportunities for everyone.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

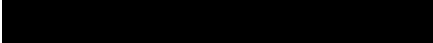
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Stacy Poppe  
Juneau, Alaska





To whom it may concern.

I would like to apologize in advance because this situation cannot be summed up in 3 to 10 sentences. This is a topic filled with DEEP emotion.

My wife & I actively own and operate Drill Team Six Fishing Excursions, LLC. We have 11 years of guided fishing experience in the Mat-Su Valley. We fully support proposal 186. For years we have been watching BOF & ADFG try to manage returning salmon stocks. The problem is the agencies cannot manage anything if there is nothing to manage. Let's cut to the chase. Freshwater sport fishing.....not an issue. The issue is there's no salmon stocks returning... and those stocks only come from one place and that is the saltwater. Management of the saltwater needs to be much more realistic. This situation is a broken record we have been listening to for years. Between saltwater commercial trawling & saltwater commercial fishing interests we know where our fish are going because of GREED IN OUR OCEANS.

Control the nets, increase the returning stocks. Easy stuff.... but yet nothing much is ever done because of GREED IN OUR OCEANS.

A real kick in the pants to a sport fisherman is when we get restricted because of low returns, yet the nets are out there scooping up fish left and right. This isn't a fish issue, it's a management issue. The fish are there, the commercial harvest numbers support that statement. But they can't get to where they need to go to reproduce because they end up in a net because of GREED IN OUR OCEANS.

Quit catering to saltwater commercial interests. If you clear-cut a forest and don't plant more trees, you're out of trees. If you continue to over harvest (now limited) salmon stocks in the ocean you're never going to get anything to return.

What is so hard to understand about this?

I don't see Chinook salmon mentioned, do we care about them anymore? I sure do. That run of fish is absolutely destroyed. Why? Overharvesting. It used to be a commercial & sportfishing issue. Sport fishing has now been restricted for YEARS. Still no fish because of GREED IN OUR OCEANS.

It's time for REAL ACTION, not more words.

Myself, as well as many others, have given up on our fisheries management. It's the same story every year, the same outcome, the same management practices, the same restrictions, but yet nothing ever changes. Talk is talk, but action gets results. So let's quit talking and start acting.

I also want to add that Alaska fishing industry is an incredibly enormous part of our tourism industry. It puts food on our table. That portion of our industry is failing at an

alarming rate costing our state money, costing small businesses money, not putting excess cash flow into fish and game programs through the sale of temporary licenses...etc. Failure of management in our oceans is leading to failure as a whole. Those aren't words, that's reality. Every time we get restricted in season, our business loses between \$8,000 - \$12,000 in trips that we have to cancel because we can't conduct them. But what's more important to us is that our customer who has booked this trip 6 months ago, has planned for it & is looking forward to it because it's a once in a lifetime experience....opportunity is taken away because of GREED IN OUR OCEANS.

It has come to the point you have better odds in Vegas hitting a jackpot, than you do having a quality Chinook or Coho run in the Mat-Su because of GREED IN OUR OCEANS.

I was hesitant to write anything concerning this, I've written several times in the past and attended meetings, publicly spoke and just never saw any action. I have completely lost faith. I personally feel that Alaska's fisheries management has failed at the highest level possible concerning Coho and Chinook stocks. Our fisheries have been beyond terrible since 2018. I think there are lots of factors why. It is too late to worry about the past. You have a narrow window to get it right, so get it right.

Proposal 186 is a step in the right direction. There needs to be MORE of this type of thinking. If there will be an inconvenience, THEN LETS ALL SHARE IN THAT PAIN.....not just the END USER (Sport Fisherman).

Thank you for your time & consideration,

With Extreme Sincerely,

Sonia & Dan Praslowicz



March 2, 2026

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Submitted via online comment form and email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: PWSAC opposes Proposal 170, 171, and 172**

Dear Chair Carlson-Van Dort and Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC employs 54 full-time staff members and approximately 75 seasonal workers funded by salmon enhancement taxes and cost recovery fish sales. These taxes and cost recovery fish sales are derived solely from Area E permit holders and PWSAC operations. PWSAC is governed by a diverse board of 45 members, of which only 27 are permit-based. The remaining 18 seats represent sport, subsistence, local municipalities, Native villages, processors, and general seats who bring valuable expertise and perspective supporting PWSAC's mission: "To ethically and professionally optimize salmon production in Area "E" for the long-term well-being of all user groups. PWSAC serves over 800 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC hatchery produced salmon. Since inception, PWSAC has returned on average 65% of fish produced to common property fisheries.

PWSAC salmon contribute significantly to Prince William Sound fisheries and regional economies. Between 2012 and 2017 PWS commercial fishermen (all gear types) harvested a cumulative total of 539 million pounds of PWSAC-produced salmon worth \$296 million<sup>1</sup>. The annual commercial harvest of PWSAC fish averaged 90 million pounds worth \$49 million.

During the same period (2012-2017), the first wholesale value to processors of products originating from PWSAC salmon totaled more than \$730 million, or an annual average of about \$122 million. Pink salmon were the largest component, contributing an annual average of more than \$70 million.

Beyond commercial fisheries, PWSAC salmon production supports sport, personal use, and subsistence harvests statewide. Between 2012 and 2017, nearly 40,000 PWSAC coho salmon were harvested, equivalent

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<sup>1</sup> Economic Impact of Alaska Salmon Hatcheries (McDowell Group 2018)

**DEVELOPING SUSTAINABLE SALMON FISHERIES  
FOR ALASKA AND THE WORLD**

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P. 907 424 7511 · F. 907 424 5508

[www.pwsac.com](http://www.pwsac.com)

to approximately 2,200 daily bag limits annually. During the same period, approximately 7,500 PWSAC sockeye salmon were harvested, representing more than 200 daily bag limits annually.

PWSAC's operation of the Gulkana Hatchery produced nearly two-in-five sockeye salmon between 2008 and 2017 in the personal use and subsistence harvest. Residents of more than 50 Alaska communities including Fairbanks, Anchorage, Matanuska-Susitna, and Copper River Valley harvested more than 325,000 PWSAC produced sockeye salmon.<sup>1</sup>

PWSAC salmon production also generates significant state and local taxes. Between 2012 and 2017, harvest of PWSAC salmon generated about \$10.6 million through the State of Alaska's Fisheries Business Tax. Half of this revenue was shared with communities where PWSAC salmon were landed (\$5.3 million) and the State retains the remainder. Cordova and Valdez receive most of these funds.

The scale of PWSAC operations translates directly into measurable cultural, social, and economic benefits to all user groups served by PWSAC's mission for nearly five decades.

For each of these proposals, please be aware, **pink and chum production and cost recovery fund the majority if not ALL PWSAC produced coho, chinook, and sockeye.** Coho, chinook, and sockeye programs generally are unable to pay for their operational costs.

#### **Proposal 170 –5 AAC 40.XXX New Regulation.**

Proposal 170 looks to reduce hatchery permitted eggtake levels of pink and chum by 25%. This proposal in similar form has asked the board to reduce hatchery eggtakes on at least 7 other occasions, all with a lack of empirical science and based on unsubstantiated claims.

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session sought to cap statewide private non-profit salmon hatchery eggtake capacity at 75% of the level permitted in 2000 (5 AAC 40.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 94 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)**

Proposal 43 – Submitted by Fairbanks Fish and Game Advisory Committee at the November 2023 Lower Cook Inlet Finfish meeting sought to amend the Cook Inlet Salmon Enhancement

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Allocation Plan and reduce hatchery production to 25% of the year 2000. **Failed 1-6 (Public comment was 6 in favor and 84 opposed)**

Proposal 59 – Submitted by Fairbanks Fish and Game Advisory Committee for the 2024 January Kodiak Finfish meeting. Reduce hatchery production to 25% of the year 2000 production. **Pulled due to lack of regulatory conformity.**

Proposal 78 – Submitted by Virgil Umphenour at the December 2024 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend private non-profit hatchery eggtake permits by 25%. **Failed 1-5 / 1 absent (Public comment was 20 in favor and 225 opposed)**

Proposal 156 – Submitted by Virgil Umphenour at the January 2025 Southeast and Yakutat Finfish and Shellfish meeting to reduce Southeast Alaska Hatchery Permitted eggtake of pink and chum salmon by 25%. **Failed 2-5 (Public comment was normal proportions with 264 opposed)**

In each instance, the Board evaluated available scientific, economic, and management information and found no conservation benefit that reducing hatchery production of chum and pink would justify the documented harm to fishermen’s small businesses, families, as well as sport, subsistence, and personal use programs in PWS and across large regions of Alaska. **The harm caused by passing this proposal is staggering, known, and quantifiable. There is no empirical or mechanistic evidence suggesting that reducing hatchery production of chum and pink salmon would lead to positive change for other species in or outside Prince William Sound Alaska.**

#### **Proposal 171 –5 AAC 40.XXX New Regulation.**

Proposal 171 looks to reduce Prince William Sound hatchery pink salmon eggtakes in a manner sufficient to reduce straying into Lower Cook Inlet streams to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan.

The proposal relies on a misinterpretation of Alaska Department of Fish and Game Special Publication 18-11 (Otis et al. 2018) and seeks regulatory action that is unsupported by science, offers no measurable action, no implementation standard, and no enforceable metric.

The Lower Cook Inlet observation report was explicitly designed as a pilot, baseline study to document the presence of hatchery origin pink salmon in selected Lower Cook Inlet escapements following the reopening of local hatcheries. The authors are clear that the observations did not evaluate biological impacts, did not assess productivity or fitness effects, and did not establish acceptable or unacceptable levels of straying. Presence alone, as documented in the report, is not evidence of harm.

From the observations the authors state that *“it is not clear what level of straying is benign and what levels should be prevented to avoid potentially negative impacts,”* and further acknowledges that if straying thresholds exist, they are species, population, and habitat specific. The publication emphasizes that few

#### **DEVELOPING SUSTAINABLE SALMON FISHERIES FOR ALASKA AND THE WORLD**

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studies have measured actual effects of hatchery strays on wild pink salmon populations. Proposal 171 disregards these conclusions and instead presumes harm where none has been demonstrated.

The proposal further misapplies the 2% straying reference from the Prince William Sound/Copper River Comprehensive Salmon Plan. As the Lower Cook Inlet report and the plan itself acknowledge, this value is not well supported by empirical evidence, was never intended as a regulatory limit, and predates much of what is now known about natural pink salmon straying rates, which commonly exceed 2% even among wild stocks.

The department, hatchery operators, and industry members have invested substantial time and resources into the ongoing Alaska Hatchery-Wild Interaction study to address questions about genetic and ecological interactions between hatchery and wild stocks after 40-50 years of hatchery existence. Hatchery operators and processors alone have contributed more than **\$8.4 million** to this more than decade long research. Proposal 171 prejudices the outcome of this work and seeks to impose regulatory changes without scientific consensus.

### **Proposal 172 –5 AAC 40.XXX New Regulation.**

Proposal 172 asks for a board generated regulation to place a moratorium on pink and chum hatchery production.

Proposal 172 is unnecessary and would undermine Alaska’s long-standing, science-based hatchery permitting framework. Hatchery operations are already subject to extensive oversight by the Alaska Department of Fish and Game through permitting, annual management plans, regional comprehensive planning, and adaptive management measures specifically designed to prevent adverse impacts on wild stocks. Where concerns arise, the Commissioner already has clear authority to amend permits or impose restrictions based on biological need. A blanket moratorium adds no new conservation protection beyond what already exists.

The proposal is premised on “uncertainty” in hatchery-wild interactions, yet uncertainty alone is not a sufficient basis for freezing department critically reviewed and evaluated permitted activities that provide demonstrable economic, social, and food-security benefits across Alaska. Importantly, major hatchery-wild interaction studies are currently underway, and as stated earlier, funded in significant part by hatchery operators themselves. Proposal 172 prejudices the outcome of this work and imposes restrictions before science is complete, contrary to Alaska’s tradition of adaptive, data-driven fisheries management.

Prince William Sound Aquaculture Corporation believes these proposals are outside the Board’s authority as Alaska statutes clearly and comprehensively assign hatchery permitting, egg-take limits, release numbers, and production decisions to the Commissioner of the Alaska Department of Fish and Game, not the Alaska Board of Fisheries. If any version of these proposals were passed at Board of Fisheries, it would bring uncertainty to hatchery programs and permitting both in terms of cuts and additions to hatchery programs. This alone is reason enough to maintain Alaska’s long standing iterative process of department and commissioner hatchery permitting coupled with the public regional planning team (RPT) process. The RPT has an advisory role to the commissioner allowing users of the resource within each region to determine

### **DEVELOPING SUSTAINABLE SALMON FISHERIES FOR ALASKA AND THE WORLD**

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what fishery enhancement is desirable. The commissioner is then able to determine what is appropriate within the department mandate to protect natural production. PWSAC urges the Board of Fisheries to continue with the Department's established permitting, monitoring, and adaptive management processes to continue doing exactly what they were designed to do—protect wild salmon while supporting sustainable fisheries that benefit all Alaskans.

PWSAC hatchery operations are permitted, monitored, and adjusted by ADF&G under regulations (5 AAC 39.222) explicitly designed to ensure no adverse impacts to natural stocks. Where risks are identified, adaptive management tools including release timing, marking, harvest controls, and broodstock limits are already employed. None of these proposals identify a documented failure of this regulatory system in Prince William Sound or elsewhere in the State.

The Alaska Department of Fish and Game has opposed proposals 170, 171, and 172 concluding they are unsupported by scientific evidence and outside the Board's appropriate role.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. PWSAC also supports the iterative process involving department staff, hatchery operators, stakeholders, and the public. In the absence of compelling data or analysis supporting a reduction for conservation reasons, any significant changes need to be thoroughly examined by hatchery board members for hatchery needs and consider stakeholder input to ensure a well-informed decision.

For these reasons, **PWSAC opposes Proposal 170, 171, and 172.** PWSAC urges **the Board of Fisheries to reject Proposal 170, 171, and 172** and any similar requests to reduce hatchery production that are scientifically unsupported, and procedurally indefensible in a manner that would destabilize the proven benefits PWSAC and Alaska salmon hatchery programs have provided for nearly five decades.

Sincerely,



Geoff Clark  
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES  
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**Submitted by:** Kristin Smith

Prince William Sound Economic Development District

**Community of Residence:** Cordova

On behalf of the PWS Economic Development District, I am writing to urge that the Board of Fisheries reject proposals 170 - 172. See attached letter to the Alaska Board of Fisheries for more detail.

Thank you for the opportunity to comment,

Kristin Smith, Executive Director, PWSEDD

---





March 2, 2026

Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries, ADFG  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Chair Carlson-Van Dort,

On behalf of the Prince William Sound Economic Development District, I am writing to express our strong opposition to Proposals 170, 171 and 172 made to the Board of Fisheries. Such a decision calls for careful scientific analysis, and I note that Department of Fish & Game staff opposed a similar proposal in 2023, commenting:

Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will have a positive impact on wild salmon stocks (ADF&G, Staff Comments, Lower Cook Inlet Finfish Board of Fish Meeting, 2023).

The drastic change in hatchery production proposed by Proposal 170 would adversely affect *all* the fisheries of Prince William Sound: subsistence, sport, seine, drift gillnet and personal use.

Even those without direct ties to seafood benefit from hatcheries as drivers of economic opportunity. Recent analysis by McKinley Research Group highlights the impacts that hatcheries have on economic outcomes throughout Alaska. Each year, Alaskan hatcheries account for roughly 4,200 jobs, \$219 million in labor income, and a total of \$576 million in economic output (MRG 2024). In Prince William Sound alone, hatcheries generate roughly 2,200 jobs, \$104 million in labor income, and a total economic output of \$315 million each year. Hatcheries drive economic impacts far beyond direct labor and income by benefiting thousands of fishermen, processing employees, and hatchery workers, not to mention thousands more support sector workers, and even sportfish charter operators and guides, who likely rely on hatchery production for some portion of their income.

Alaska's hatchery system was established by legislation and is managed within careful regulatory and permitting constraints. Proposal 172 disregards this system and bypasses the science-based permitting process and commissioner oversight. This proposal would eliminate

...

the processes set up to facilitate public participation in the deliberations of managing our PWS fisheries.

It's hard to overstate the far-reaching impacts of Alaska's hatcheries, especially when it comes to additional tax revenue. Hatcheries and the fish they produce generate local revenue through taxes on raw fish, property, and sales paid by commercial and charter fishermen, seafood processors, hatchery associations, and support sector businesses and employees. These tax revenues help Alaskan communities to survive in the challenging years and thrive in the good years across the state.

More directly, hatchery-produced salmon contribute to the State of Alaska Fisheries Business Tax, which ranges from three percent to five percent and is levied on ex-vessel values of harvested hatchery salmon. The revenue from this tax is split evenly between the state and the community where the salmon are landed. Thanks to enhancement taxes paid by commercial fishermen and cost recovery activities, Alaska's nonprofit hatcheries are a major driver of south central Alaska's economy, ensuring that they contribute much more to the state's economy than they pull out of it.

Because Prince William Sound salmon hatcheries are a resource that benefit all fishing user groups, generate revenue for the State and for our fishing communities, and are one of our region's bigger employers, we oppose the approach put forward in Proposals 170, 171 and 172 and urge the Board of Fisheries to reject these proposals.

Thank you for your consideration,



Kristin Smith  
Executive Director



## 2026 Statewide BOF Public Comment

Madam Chair and Members of the Board,

Thank you for the opportunity to comment prior to the upcoming 2026 Statewide Board of Fish Meeting in Anchorage. My name is Forest Jenkins and I am an Alaskan resident. I am the current president of the Prince William Sound Setnetters' Association, which has been in existence since 1993. I hold seats on both the CDFU and PWSAC Boards. I have been participating in the Eshamy District setnet fishery since 2008, and I am an active permit holder in the Prince William Sound commercial drift gillnet, setnet, and shrimp fisheries.

### **Proposals 170, 171, 172-OPPOSE**

Before we can start discussing these proposals, we have to ask ourselves what is the real goal of these proposals and what is driving the proposers to push for such drastic and destructive change? We see two potential arguments here. One centered on the interaction between wild and hatchery stray pink salmon that is built on incomplete and insufficient research on relative fitness and concerns about competition in spawning habitat. The second, which is centered on the assumed interactions between wild king salmon and hatchery stray pink salmon and is built on strong reactionary emotions and an agenda to save specific struggling king stocks in this state, is not representative of the proposals or the hatchery stray data that is currently available.

The majority of the research is being conducted on wild and hatchery stray interaction between hatchery and wild pink salmon and not on the interactions between wild king salmon and hatchery stray pink salmon. If the Board is going to make any movement at all related to pink and chum salmon egg take based on king salmon concerns, they will do so solely with the effort to "do something." We are in a tough spot in this world today and a lot feels out of our control. The Board of Fish doesn't have instantaneous solutions to the complexities of climate change, permafrost melting and leaching heavy metals into fragile spawning habitat, receding ice pack and rising water temperatures, increased predation and selective predation from pinnipeds and whales, changing populations of important prey species that are sensitive to rising ocean temperatures—such as capelin that have made up the majority of king salmon gut content at times in the past—and therefore the board doesn't have a simple solution to the king salmon concerns across our state. There is no substantial evidence linking the decline of king salmon stocks with hatchery pink salmon. That said, some may be feeling the need and panic to dismantle these hatchery programs and curtail the livelihood of our coastal communities in the effort to save the king salmon, because it's something you believe you can change. But without clear evidence and justification, this should not be an option.

The Board should be making decisions based on good science and stakeholder input that justifies their decisions and backs up the data. The Board should be seeking long-term solutions and recommending further research to enable them to make informed decisions in an attempt to solve the complex and challenging issues. Undermining

hatchery programs in the Prince William Sound or across the state without the science to back it up will come back to bite us all. We need more science and we need more answers before we kick out the stool from under one of the most significant scientific backbones in this state. There is a great deal of current research being done within PNPs to increase fidelity of hatchery stocks and minimize effects on wild stocks. Alaska hatchery programs are designed to enhance Alaska salmon fisheries while taking pressure off wild stocks. If we want to try to save king salmon and protect our wild salmon stocks in general, viable hatchery programs will be a cornerstone in this research and conservation effort. Disabling these programs just in an effort to 'do something' is very irresponsible and nearsighted.

The proposals and the appropriate associated discussions should be centered on the interactions between wild pink salmon and hatchery stray pink salmon. We will address these concerns here and clarify that the solutions still do not lie in these proposals, but rather in further research and collaboration with hatchery programs across the state.

First, we would like to address the fitness studies that are being used in the proposers' argument to reduce hatchery production. With the second generation data just recently being presented at the AMSS (Second generation fitness consequences of Pink Salmon hatchery-origin strays in Prince William Sound, Shed et al., 2026), we see the fitness already improving back toward the original wild fitness. This is encouraging data and it is clear that we need to understand what happens in the third generation and maybe beyond. Through natural selection and adaptation it appears that these lower fitness genetics will already be worked out of the population by the third generation. This might help explain why after decades of hatchery production in Alaska, we still have prolific genetically distinct wild pink salmon stocks all over the state. If the lower relative fitness of hatchery fish was negatively impacting the fitness of wild pink salmon stocks, how are we still seeing such genetically diverse and unique pink salmon stocks thriving all over the North Pacific? Although we only have data for the first two generations of this study, we have decades of data naturally recorded in the genetically distinct wild pink stocks, clearly suggesting that over time, hatchery stray pink salmon are not reducing the fitness of wild pink salmon stocks.

Second, we would like to address the straying concerns related to competition for spawning habitat. Based on the data presented, it appears that the majority of these hatchery strays are showing up late to wild streams that are already fully occupied by wild pink salmon. When this is the case, less productive hatchery strays are assumed to have little success competing for spawning habitat late in the game. We also have to remember that wild pink salmon have a high level of straying in their populations, and we don't know exactly what that percentage is. This makes it really difficult to scrutinize hatchery stray rates when we don't know what baseline is. Also, straying is a genetic advantage to expand the species and occupy new, optimal habitat when natal streams are at capacity or when more ideal habitat emerges from watershed changes or glacial recession.

When you combine the relative fitness data with the natural straying phenomena, it appears that there is no current issue warranting these drastic shifts in hatchery production. One potential concern with hatchery straying is the long-term risk to wild stock genetics, but when straying is a natural occurrence and wild fitness appears to prevail through generations of interbreeding, we are struggling to see any concern here. All of the research that has been done concludes with the request for more funding and more time for further research; it is clear that more research is needed to make any decisions at this level. We fully support further research regarding what happens to the third and potentially fourth generations, and we also fully encourage the continued research from the Department and the PNPs to continue fine tuning the most sustainable hatchery system in the world that we are all so fortunate to have in our backyard.

Lastly, there is a misconception around the state that hatchery fish, and specifically pink and chum salmon, are for the benefit of commercial fishermen only. However, these two species are a significant economic driver that help make it possible to fund other smaller programs and partnerships that offer access to all five species of salmon to all Alaskans. Without sufficient pink and chum production to maintain economically viable hatchery programs, how do we expect to have the capacity to provide sport and subsistence opportunities for all Alaskans while also taking pressure off wild stocks? ADFG Sport and Subsistence programs around the state already significantly partner and even lean on PNPs for their increased capacity and expertise. ADFG stocking programs around the state are at capacity and have no more space for further rearing expansion, all while people are asking the stocking program to stock more kings and silvers for sport and subsistence needs. ADFG Sport Fish has a healthy, collaborative relationship with these hatcheries and they see the necessity for them moving forward. PWSAC will resume rearing for 250,000 king salmon for release in Chenega, Cordova, and Whittier. In addition, they are currently working through the permitting process for a requested 20,000 kings for Tatitlek. With ADFG stocking programs at capacity, future stock restoration projects and expanded harvest opportunities for all Alaskans depend on collaboration with PNPs.

Any reduction or moratorium on hatchery production would indefinitely handcuff us from taking action to restore struggling wild salmon stocks. This is an opportunity for us to nurture our relationship with Alaskan hatcheries to ensure we have all the tools available to respond and sustainably manage salmon stocks across our state, meanwhile providing food security and supporting healthy coastal communities.

### **Proposals 164 and 165-SUPPORT**

We fully support both of these proposals that simply intend to clean up the pelagic trawl fishery and bring it into compliance. Transparency and regulatory compliance from the trawl fleets are essential for the long-term viability and sustainability of this fishery.

Pelagic trawlers in state waters are not allowed to touch bottom, but this is currently not enforceable without bottom-monitoring technology. Requiring bottom-monitoring in this

fishery would bring fishing practices within regulation while protecting the fragile and ecologically important benthic habitats in state waters.

We also believe that the addition of salmon excluders to pelagic trawl gear in state waters is another great step in reducing our unintended impact on wild salmon populations. The current climate around salmon bycatch in Alaska combined with concerns about salmon stocks around the state demands conservation efforts and clarity in this fishery.

We encourage the Board to pass both of these proposals, as they do not intend to impede success in this fishery, but simply ask for conservation and regulatory compliance.

### **Proposal 175-SUPPORT**

We fully support this proposal to reduce the dip net mesh size in order to help reduce incidental catch-and-release mortality of Chinook salmon.

### **Proposal 180-SUPPORT**

We support this proposal that would set an annual statewide limit of 5 king salmon in the sport fishery. During times when all of us are being restricted to protect king salmon populations around the state, it is irresponsible not to have an annual limit on king salmon in the sport fishery. ADFG recently reduced the daily limit to 1 king salmon from April 1st to September 15th in the Gulf of Alaska. With obvious concerns around multiple king stocks in our state, we should not be allowing such a liberal winter king fishery to be executed. It seems counterintuitive to only restrict a sport fishery for part of the year if we are trying to protect king stocks.

### **Proposal 187-OPPOSE**

We strongly oppose the proposal to close the Tsiu, which is a completely allocative grab attempting to remove a historic commercial setnet gear group from the fishery when there is no biological concern or allocation concern. In our opinion, this proposal should never have made it past an ACR; natural stream bed fluctuations at the mouth of a river located on a violent, exposed stretch of coastline are not unforeseen and should not qualify as an out-of-cycle emergency, particularly for a stock with no biological concern.

This proposal would essentially push the setnet fleet out of the Tsiu River and establish a private fishery for the sport fish lodges. Commercial users would be forced to fish only in the Kaliakh and outside of the mouth of the Tsiu River. Currently, every user group along this system is getting their fish throughout the two seasons since the river changed its course. So why are we here to discuss this? How is a change in a naturally ever-changing mouth of a river considered unforeseen?

Further, this fishery is the only alternative for setnet permit holders in the Eshamy District. Historically, setnet fishermen generally targeted coho stocks in the fall, often relocating to different river systems to target these fish. This is part of the reason why

our CFEC permits allow us to fish the sockeye run in Eshamy and the silver run in the Tsiu. There are 29 active permits in my fishery. When there are weak returns in the small 12-mile Eshamy District, this is the only place we are legally allowed to fish besides the Eshamy District. If this proposal were to be adopted, we would lose significant access to the already small area we are granted to fish with a PWS Setnet Permit.

Eliminating this area from our fishery would be extremely allocative, could lead to a further drop in permit value and economic stability, and is absolutely uncalled for. We advise the Board to reject this proposal, as a changing river channel is clearly not an unforeseen situation, it is a blatant allocation grab by the sport user group, and there is currently no biological concern in this fishery.

Thank you,

Forest Jenkins  
Prince William Sound Setnetters' Association President

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Prisciandaro, and I am the owner and operator of the fishing vessel Lori Ann, based out of Haines, Alaska, fishing in the northern Southeast area of Alaska. I have actively fished a Southeast Alaska gillnet permit for the last 17 years.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals are passed, my livelihood and income would be drastically affected. I have fished on hatchery fish every year of my fishing career, and they represent about half of my income for the year. Reducing their production would change my family's stability greatly.

With reduced production of hatchery fish, our communities in Southeast Alaska and other areas of the state will see a reduced trickle-down effect from the earnings of fishermen who live in the area.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,





PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

1900 W Nickerson St., Ste. 320 ■ Seattle, WA 98119 ■ Tel: (206) 283-7733 ■ Fax: (206) 283-7795 ■ [www.psvoa.org](http://www.psvoa.org)

March 2, 2026

**SUBMITTED ELECTRONICALLY**

Alaska Board of Fisheries  
P.O. Box 115826  
Juneau, AK 99811

**Re: Oppose Anti - Hatchery Proposals 170, 171, and 172**

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following comments opposing the above-referenced anti-hatchery proposals which are before the Board at the upcoming March 17 – 20, 2026, Statewide Finfish and Supplemental Issues meeting. PSVOA is a commercial fishing organization having members that participate salmon purse seine fisheries throughout the state.

PSVOA strongly opposes the above-referenced anti-hatchery proposals. In general, these proposals are nearly identical to other anti-hatchery proposals which the Board has consistently and correctly rejected in the recent past. In permitting hatchery operations, the Alaska Department of Fish and Game (ADF&G) already considers many of the concerns raised in these proposals, including the need to minimize interactions between hatchery origin and wild salmon and the need to ensure harvest practices targeting hatchery produced salmon do not negatively impact wild fish.

**Proposal # 170: OPPOSE**

PSVOA is opposed to proposal 170. PSVOA opposes proposals that seek to reduce hatchery production and has opposed this proposal in its previous forms. Proposal 170 is merely another attempt to simply reorder the words of proposal 156 and proposal 78, which were previously rejected during the 2024/2025 board cycle in Southeast and Prince William Sound, respectively. This proposal fails to consider the economic impacts a 25% reduction in pink and chum production would have on all statewide salmon harvesters. Moreover, the proposal lacks any newly discovered scientific evidence linking hatchery production with a decline in other wild salmon stocks.

**Proposal #171: OPPOSE**

PSVOA is opposed to proposal 171. Again, PSVOA is opposed to proposals that seek to reduce hatchery production. Proposal 171 requests changes to PWS hatchery production sufficient to reduce straying to achieve a 2% stray rate as stated in the 1995 *PWS/Copper River Comprehensive Salmon Management Plan* (PWS plan). The 2% stray rate is limited to the PWS

March 2, 2026

Page 2

plan, it is not incorporated into any other regional salmon management plan, and it was a **recommendation** for the consideration of optimizing hatchery production. As stated in the PWS plan, inclusion of the 2% threshold was not well supported by members of the RPT at that time, which recommended ongoing research be used to determine the effects of hatchery straying on wild salmon populations. Such research is currently being conducted on a broad scale through the Alaska Hatchery Research Project. The ADF&G pilot study for Lower Cook Inlet (LCI) streams referenced in the proposal does not support the proposition that PWS hatchery strays are negatively affecting the productivity or sustainability of LCI pink salmon. In fact, there are no stocks of concern currently listed for LCI pink salmon.

**Proposal # 172: OPPOSE**

PSVOA is opposed to proposal 172. PSVOA does not support any board-generated regulation that caps or limits hatchery production by the Alaska Board of Fisheries. The authority to issue hatchery permits and to regulate hatchery production rests solely with the ADF&G Commissioner. When exercising its regulatory authority over hatchery production, ADF&G considers available science and the precautionary principle, economic need, and program viability. The board lacks the legal authority to set hatchery production through regulation. Instead, the board's role beyond the consideration of the original hatchery permit request is limited to the allocation of hatchery produced salmon among competing user groups. The board lacks the authority to adopt regulations that limit or condition a hatchery permit through a moratorium because it conflicts with the authority of the Commissioner and removes the Regional Planning Team's role in defining regional production as set forth in 5 AAC 40.340. Moreover, the proposed moratorium would prohibit future hatchery production until the "resolution of uncertainty in the science regarding hatchery-wild effect" can be determined. It is currently unknown when the "uncertainty" will be fully resolved.

The board has consistently deferred decision-making and oversight of hatchery programs to the Commissioner and ADF&G. PSVOA encourages the board to continue in this vein by rejecting proposals 170, 171 and 172.

In closing, PSVOA supports the ongoing efforts of the Alaska Hatchery Research Project to better quantify hatchery-wild interactions. Until that research is concluded, its findings are put into perspective and evaluated against existing hatchery policy by ADF&G, the board should refrain from taking any of the above requested actions.

Thank you for your careful consideration of PSVOA's comments.

Very truly yours,

*Robert Kehoe*

Robert Kehoe, Executive Director  
Purse Seine Vessel Owner's Ass'n

**Submitted by:** Stephanie Rathert

**Community of Residence:** Eagle River,AK

Mid-water and bottom trawling are destroying not only our Alaskan sea floors, but the important habitat that helps keep our local fisheries strong and healthy.

Please consider saving our fishing grounds. Your decision on Proposal 11, will effect generations of Alaskans.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ryan Reeves, and I am a commercial fisherman and processor in Alaska. I own and operate the F/V Satsuma and work as a gillnetter, troller, longliner, crabber, and shrimper. I am also a subsistence user who mostly eats game meat and fish that I process myself, and when I am not commercial fishing, I enjoy sport fishing and hunting.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I depend on hatcheries for the bulk of my income. If we start to cut production at our hatcheries, we would be forced to start cutting other production like coho and king salmon programs, which are paid for by chum production. Hatcheries are already struggling with increasing operational budgets and infrastructure demands. The result of a boilerplate 25 percent reduction across all hatcheries is unsustainable for hatcheries, fishermen, and sport fishermen who rely on these fish to feed their families.

Specifically in Southeast Alaska, these communities were built on commercial fishing, so you can imagine the impacts from fishermen all the way to the hardware stores, groceries, harbor departments, and boat yard businesses. Personally, I can tell you that maintaining a boat takes a lot of money that gets distributed through the communities and through the businesses. These hatcheries are a self-sustaining economic engine that pays for itself. If we start entertaining out-of-touch proposals, this industry is in dire straits. We have an excellent Department of Fish and Game, and scapegoating hatcheries for ocean conditions or poor survivals is the last thing we need to be doing. It undermines the officials that we put our faith in to manage us.

The very expensive king and coho programs that hatcheries offer, which are paid for by chum production, would be the first to get cut. Sport and charter users rely heavily on coho and king production. This is free opportunity — they are not charged in any way to access these fish. These fish are extremely valuable, and there are businesses that thrive on them.

The reality is that these hatcheries need help, not harm from repeat proposals each cycle. We just finished a regional Board of Fish meeting with overwhelming opposition to these proposals. We are willing to fight again in a different area because these fish are worth it.

We need to start seeing hatcheries as a solution instead of trying to put them out of business. We would not have sustainable fisheries without hatcheries. We would not have access as subsistence users, and we would not have opportunities for sport fishing. The Department should be trying to use the hatcheries to rehabilitate some of the stocks of concern.

I sit on the SSRAA board, and the Board needs to know that we are not trying to put more fish in the water. We are trying to optimize what we have, whether it is hatching fewer fish for better returns or maintaining current levels to increase what comes back. We are always looking at the most recent data and evaluating each program to do what is best for all user groups who use the resource.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ryan Reeves  
Alaska



**Submitted by:** Patrick Reilly

**Community of Residence:** Fairbanks

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose.

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaskas fisheries.

- Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.
  - Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.
  - Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.
-

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Armin Reimnitz. I am a commercial fisherman in Prince William Sound and fish aboard the Anapilar.

Reducing the number of salmon available to harvest would directly impact a severely stressed Gulf of Alaska salmon seining fleet. These reductions would also directly impact processors, support businesses, and the fishing fleet that harvest America's wild salmon.

We are already under major financial pressure. Many salmon producers are on the brink of bankruptcy. The industry has been built around expected hatchery returns, and sudden broad reductions would destabilize fishing plans, processor operations, and community economies.

I also believe trawlers in the Gulf of Alaska and Shelikof Strait have impacted local salmon returns, particularly King salmon, and that those impacts warrant serious attention.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Armin Reimnitz

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ray Renner, and I am a third-generation commercial fisherman, subsistence user, and local business owner participating in Prince William Sound fisheries in Cordova, Alaska. I own the F/V LZ and operate a 58-foot seiner, the Kelly Ann.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals pass, incomes, sustainability, job security, businesses, livelihoods, and our small fishing community will not survive. They will take food off of people's tables and money that pays the bills. There is no scientific reasoning behind any of this that warrants these proposals to even be considered.

Our community would be substantially affected. Cordova depends on fish tax revenue, and these proposals would take away job opportunities for a lot of people. This could cripple our commercial fishing fleet and our community by taking away opportunity that is not warranted by any scientific studies.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brita Restad. I was born and raised in Homer, Alaska. My family and I are subsistence users and specifically benefit from the China Poot terminal fisheries. I worked as a kayak guide in Kachemak Bay for the past six summers and have spent extensive time observing this ecosystem—experience that helped inspire my bachelor's degree in natural sciences with an emphasis in biology. Many people I respect and care about in my community depend on localized commercial fishing, and on the food web and broader ecosystem supported by salmon, for their livelihoods as well as for tourism, education, and scientific study. Many of us are deeply invested in seeing these biological systems thrive rather than struggle.

Reducing hatchery production would directly reduce the number of returning adult salmon to Kachemak Bay (among other places, but Kachemak Bay is the biological system I know best). This decrease would ripple up the food web, affecting biodiversity and species people come here to see, and it would harm Kachemak Bay's value for ecotourism and biological study.

Salmon are a keystone food for people here. Harvesting salmon provides an affordable, healthy source of protein. Without it, more of our food choices must be shipped in from out of state, increasing cost and decreasing availability. People also depend on salmon economically through commercial fishing, sport fishing, tourism, and the many forms of local work supported by healthy salmon-driven ecosystems.

Alaska has historically done a fair job balancing human pressures and natural pressures on salmon populations through data collection and adaptive feedback loops. But if populations continue to decline due to multiple factors—some within our control and some not—competition between human and natural demands will intensify. Right now, we still have the privilege of maintaining and supporting a relatively healthy ecosystem rather than trying to nurse a struggling ecosystem back to health, which is vastly more difficult, expensive, and costly in time, manpower, and sacrifices required of local communities. I urge you to examine what the decline of salmon on the Washington coast has done to their fishing industry, communities, and ecosystems.

We are facing real pressures that can negatively affect salmon populations, from warming-driven changes in upwelling and planktonic food sources for smolt, to increased human development degrading water quality in natal streams. Hatcheries are one tool we can use to support runs by improving survival during early life stages before release, while still allowing natural selection and adaptation to occur in the wild after release. This is an artificial population boost that can add robustness against adversity.

I understand concerns raised from studies of domesticated salmon in fish farms and the fear that human-managed environments could increase the frequency of traits that would otherwise be selected out in the wild. But those concerns are not automatically transferable to Alaska's hatchery model where fish are released at fry or smolt stages and face strong natural selective

pressures after release. The primary mortality risk reduced by hatchery rearing during egg and alevin stages is not selective mortality tied to individual traits—it is often stochastic. As one example that informed my understanding: Small, Maureen P., et al., “Impacts of Supplementation: Genetic Diversity in Supplemented and Unsupplemented Populations of Summer Chum Salmon (*Oncorhynchus keta*) in Puget Sound (Washington, USA),” *Canadian Journal of Fisheries and Aquatic Sciences* (2009).

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.


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Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Brita Restad  
Homer, Alaska



PC403

**Submitted by:** Andrey Reutov

**Community of Residence:** Homer

I believe there has to be a drastic change in trawl regulation. I fished my whole life and it is getting very hard to make a living. Because there is little fish left. And now they are threatening our salmon seasons. I know many friends and family that have suffered from these consequences.

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PC404

**Submitted by:** George Reutov

**Community of Residence:** Homer, AK

I oppose a proposal 186 its just unreasonable to shut down the entire area 1 for just 2 rivers that's not even monitored or recorded, there's family life's depending on this fishery, please except my comment along with many others.

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PC404

**Submitted by:** George Reutov

**Community of Residence:** Homer Alaska

I support proposal sb161,163,164,165.

Im sick and tired seeing the trawlers raping the bottom floor in our home town killing the dungeonous crab, kings, chum and we are the small time fishermen being blamed for it. please help us save our fishery and kick the out of state'ers to the curve before its to late

Thank you.

---

PC405

**Submitted by:** Greg Reutov

**Community of Residence:** Homer

I fished cook inlet with my dad since I was a kid and I would be devastated to see something like this happen to cook inlet if proposal 186 will go through.

I oppose proposal 186 because if area one will be shutdown permanently it will over escape the main rivers, it will be bad for cook inlets future runs and then the escapements will be poor in other main rivers. 2nd. If area one will be shutdown all the fishermen will be crunched down to smaller area to fish with this many permits, it will be a chaos out there worse then Bristol Bay. Thank you for your consideration and support 🙏.

---

PC406

**Submitted by:** Brian Riddle

**Community of Residence:** Anchorage

Proposals 170, 171, and 172 all are commonsense reductions to the overproduction of lower valued smelts that has led to serious admixture with wild stocks and deleterious effects on King Salmon.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Craig Ring, and I am a sport and commercial hand troller, subsistence user, and community member in Ketchikan, Alaska. I fish aboard the F/V KMZ. I am also a retired member of the U.S. Coast Guard and a member of the Ketchikan Indian Community.

It is already hard to make a living. If fish are taken out of the hold or out of our freezers, my family and elderly family members who rely on assistance will suffer. Without hatcheries, there would be less fish for local people and less food for families and elders who depend on it.

Cutting hatchery output is a lose-lose situation. There is no benefit for local communities. A lack of fish affects every business. Many people and businesses lose money, while outside interests do not bear the cost.

We have seen what happens when fish disappear, as in the 1970s, when local people went hungry. Hatcheries have helped Alaska communities and businesses recover and thrive. History shows what salmon runs looked like before hatcheries and the positive impact hatcheries have had since.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Alaska Board of Fisheries  
State of Alaska  
Department of Fish and Game  
Board Support Section

RE: Opposition to Proposal 187 – Tsiu River and Tsiu–Kaliakh Confluence Commercial Fishing Closure

Submitted by:  
Regina Rioux  
Terri Bogren  
Damien Long  
Vernon Hansen

Dear Members of the Alaska Board of Fisheries,

We respectfully submit this opposition to Proposal 187. We are Alaska Native allotment family members with direct reliance interests tied to the Tsiu River system and surrounding waters. We respect the Board process and the importance of conservation-based fisheries management. We fully support conservation-driven regulatory action when supported by clear biological evidence. If demonstrated biological data were to show that stronger restrictions are necessary to protect escapement or long-term stock sustainability, we would support those measures.

Our concern with Proposal 187 is not about avoiding regulation. Our concern is whether this proposal represents a proportional conservation response supported by sufficient biological evidence, or whether it represents a regulatory shift from adaptive conservation management toward elimination of an existing fishery without first demonstrating that existing tools cannot be modified to meet conservation needs.

The proposer is affiliated with lodge-based sport fishing interests operating within the Tsiu River system and has direct operational and economic interests in the affected area. Stakeholder participation in the regulatory process is appropriate and expected. However, proposals that substantially reallocate access to public trust resources should be supported by clear biological necessity and balanced consideration of impacts to all affected parties, including Alaska Native allotment holders and existing lawful commercial users such as our family. This comment is not intended to criticize any user group. Rather, it is intended to ensure regulatory decisions are grounded in biological data and proportional management principles.

As written, Proposal 187 functions as a reallocation of access rather than a demonstrated conservation necessity. The proposal advances a complete closure of commercial set gillnet fishing in and around the Tsiu–Kaliakh River confluence without presenting empirical biological evidence that existing regulatory tools are insufficient to meet escapement goals or protect stock health. The proposal relies on generalized assertions of increased interception risk following a reported change in river morphology but does not provide stock-specific data, modeling, or analysis demonstrating that current management measures have failed or cannot be reasonably modified to address the alleged concern.

Historically, the Tsiu River has been managed as a sensitive system through targeted regulatory tools designed to balance escapement protection with continued lawful commercial access. These tools have included reduced fishing time, gear length limitations, placement and obstruction controls, and targeted closed-water areas. Collectively, these measures represent an adaptive management framework that has allowed managers to respond to biological conditions while maintaining the long-standing commercial fishery associated with the river system.

Proposal 187 represents a significant regulatory escalation by moving directly from this historically adaptive management structure to a permanent spatial closure within the Tsiu River and a one-quarter mile radius surrounding the Tsiu–Kaliakh River confluence. At the same time, the proposal repeals existing Tsiu-specific management tools on the basis that they would no longer be necessary if the fishery itself is eliminated in the affected area. This approach bypasses evaluation of whether existing regulatory mechanisms could be modified to address the alleged change in interception risk.

If the stated concern is increased interception potential due to altered river morphology, regulatory response would typically first evaluate whether existing time, gear, and placement controls could be modified before eliminating fishery access entirely. Fishing time could be further restricted or aligned with periods of lower Tsiu stock vulnerability. Gear restrictions could be tightened through additional net length reductions, spacing requirements, or orientation standards relative to current flow. Placement controls could be modified to expand migration corridors or restrict set locations within specific channel geometry zones. Additionally, targeted seasonal or data-triggered closures could be implemented during high-risk periods rather than imposing a permanent geographic closure that applies regardless of actual in-season biological conditions.

While Proposal 187 does not eliminate all commercial fishing opportunity across the broader region, closure of the Tsiu River and the waters immediately surrounding the Tsiu–Kaliakh confluence may substantially reduce practical and economically viable fishing opportunity by removing access to a primary migration corridor and historically fishable area. In river systems where fish movement is geographically concentrated, spatial closures at key migration funnels can have effects beyond the immediate closed area.

In addition to operational impacts, continued regulatory access to traditional use waters supports long-term cultural continuity, intergenerational knowledge transfer, and future community choice to engage in traditional, commercial, or cultural uses. Even where current harvest activity may be limited or intermittent, maintaining access preserves the ability of future generations to maintain a living relationship with these waters. Regulatory actions that permanently eliminate meaningful access opportunities can therefore have impacts beyond immediate harvest activity, including effects on long-term community continuity and place-based cultural connection.

The proposed closure is geographically overbroad and untethered to demonstrated stock-specific impacts. By closing all waters within a quarter-mile radius of the confluence, the proposal applies a blanket restriction that is not narrowly tailored to actual migration patterns, timing, or interception rates and disproportionately impacts existing commercial operations and land-based interests tied to these

waters, including Alaska Native allotment reliance interests.

From a regulatory policy perspective, Proposal 187 replaces a historically flexible management framework with a static closure model. This reduces the Board's ability to respond dynamically to biological monitoring and instead establishes a fixed restriction that can only be changed through future regulatory action. Such a shift from adaptive management to permanent closure typically requires clear empirical biological evidence demonstrating that existing management tools are insufficient to meet escapement objectives.

The historical progression of management in this system further highlights the magnitude of the proposed change. Prior to the reported 2025 storm event, the Tsiu River was managed through targeted controls specifically designed to address stock sensitivity while preserving the fishery. The storm event is now cited as justification for a transition directly to full spatial closure in the confluence area and elimination of the existing regulatory toolset. The central policy question therefore becomes whether sufficient biological evidence exists to demonstrate that modification of existing tools cannot reasonably address the alleged interception risk.

We want to emphasize that we support precautionary management when supported by data. We support conservation-based fisheries management. We support adaptive regulatory changes when biological monitoring demonstrates need. Our position is that regulatory escalation to permanent closure should occur only after demonstrating that existing management tools cannot reasonably achieve conservation goals.

In the absence of such evidence, replacing adaptive management with permanent closure represents not only a conservation decision but also a significant allocation decision affecting long-standing commercial users and Alaska Native allotment–associated reliance interests tied to these waters.

For these reasons, we respectfully request that the Board not advance Proposal 187 absent clear biological evidence and a more narrowly tailored management approach.

Thank you for your time and consideration.

Respectfully,

Regina Rioux  
Terri Bogren  
Damien Long  
Vernon Hansen

Alaska Board of Fisheries  
State of Alaska  
Department of Fish and Game  
Board Support Section

RE: Opposition to Proposal 187 – Tsiu River and Tsiu–Kaliakh Confluence Commercial Fishing Closure

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Regina Rioux  
Terri Bogren  
Damien Long  
Vernon Hansen

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Historically, the Tsiu River has been managed as a sensitive system through targeted regulatory tools designed to balance escapement protection with continued lawful commercial access. These tools have included reduced fishing time, gear length limitations, placement and obstruction controls, and targeted closed-water areas. Collectively, these measures represent an adaptive management framework that has allowed managers to respond to biological conditions while maintaining the long-standing commercial fishery associated with the river system.

Proposal 187 represents a significant regulatory escalation by moving directly from this historically adaptive management structure to a permanent spatial closure within the Tsiu River and a one-quarter mile radius surrounding the Tsiu–Kaliakh River confluence. At the same time, the proposal repeals existing Tsiu-specific management tools on the basis that they would no longer be necessary if the fishery itself is eliminated in the affected area. This approach bypasses evaluation of whether existing regulatory mechanisms could be modified to address the alleged change in interception risk.

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In addition to operational impacts, continued regulatory access to traditional use waters supports long-term cultural continuity, intergenerational knowledge transfer, and future community choice to engage in traditional, commercial, or cultural uses. Even where current harvest activity may be limited or intermittent, maintaining access preserves the ability of future generations to maintain a living relationship with these waters. Regulatory actions that permanently eliminate meaningful access opportunities can therefore have impacts beyond immediate harvest activity, including effects on long-term community continuity and place-based cultural connection.

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For these reasons, we respectfully request that the Board not advance Proposal 187 absent clear biological evidence and a more narrowly tailored management approach.

Thank you for your time and consideration.

Respectfully,

Regina Rioux  
Terri Bogren  
Damien Long  
Vernon Hansen

**PC410**

**Submitted by:** Ralph Roberts

**Community of Residence:** Port Hardy

Am opposed to cutting hatchery production

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**PC411**

**Submitted by:** Alexis Rodriguez

**Community of Residence:** Wasilla

162 and 175 simply oppose!!!

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ryan Rogers. I have been a Prince William Sound salmon permit holder since 1988 and have fished continuously in Prince William Sound since 1983. I have also fished across Alaska, including Bristol Bay and the Bering Sea. I fish aboard the F/V Cat-Bil-Lu.

The hatcheries provide our fishery more stability than many other areas, which enables consistent investment into operations, crews, and communities. Reduced production would reduce that investment potential and weaken crew stability.

These proposals could negatively impact the Valdez community through reduced spending by the fleet if fishing time declines due to reduced production. They also threaten a major part of Alaska's pink salmon production that supports the broader economy. The risk of reduced returns does not make sense given the lack of clear evidence of harm. The growing demand for affordable protein should be part of the consideration when weighing incomplete science against proven production.

Approved testimonial:

"The hatcheries of PWS have been vital to my fishing success for over 40 years as well as provided me the opportunity to raise my two children with a strong work ethic providing a healthy protein for all to enjoy."

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,  
Ryan Rogers  
Valdez, Alaska



Nate Rose  
Kodiak, AK, 99615

March 2, 2026

Art Nelson  
Alaska Board of Fisheries  
Alaska Department of Fish and Game, Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Re: Support for Alaska's Private Non-Profit Hatchery Program, oppose proposals 170, 171, 172

Madam Chair and Members of the Board:

Thank you for the opportunity to voice my **opposition to proposal 170, 171, and 172**. My name is Nate Rose and I am a fisherman from Kodiak Alaska. I own and operate the FV June Sea built in 1988, and I currently fish for crab, cod, halibut, rockfish, and salmon over the course of the year.

I urge the board to consider **opposing** the suite of proposals attempting to control the output of hatchery production in Alaska. These proposals were written on a theoretical basis and there is no concrete evidence supporting the claim that juvenile wild stock salmon are competing for food resources with hatchery fish, however there is **measurable harm** that would be inflicted on the various user groups that benefit from the hatchery programs in Alaska, and more specifically the program here in Kodiak.

As a former board member of the Kodiak Regional Aquaculture Association that manages our local hatcheries, I can attest to the fact that the Kodiak hatcheries, both at Kitoi Bay and Pillar Creek, have been and are continuing to run programs designed to benefit **all user groups** in the Kodiak Archipelago, and beyond. KRAA has managed to create terminal harvest sockeye runs in the local villages of Ouzinkie and Port Lions, a vibrant road-system coho fishery in coordination with the Division of Sport Fish at the ADFG, a subsistence, sport and commercial fishery in Telrod Cove on the West side of Kodiak, and has helped to enhance the commercial pink and chum salmon fishery out of Kitoi bay, a mere 3.5 hours from Kodiak town.

This pink and chum salmon program provides stability to the Kodiak salmon fishery given the fact that Kodiak has always had a strong biennial pink salmon fishery, meaning it is very odd to have two strong pink salmon years back-to-back. The chum fishery, although small in relation to others around the state has been the only lifeline for salmon seiners during the month of June, as

our traditional Westside sockeye fishery has been closed due to week sockeye runs and king salmon conservation concerns.

The close proximity of the hatchery to Kodiak town, only 3.5 hours, provides opportunity for our fleet of smaller aging vessels to fish close to town in the event of mechanical or refrigeration issues. All current processing markets require refrigerated sea water systems, or RSW to chill fish, and yet most will work with fishermen if the systems are malfunctioning if those vessels commit to fishing close to town and taking ice from the cannery. During the busiest time of the season, the hatchery can support 50 seiners with everyone still making enough to justify the effort.

Funding for the Kitoi hatchery currently comes from cost recovery efforts. ADFG and KRAA staff work in coordination to achieve cost recovery in a timely fashion so that the common property fishery has the opportunity for maximum benefit of the fish resource, and I believe they do it the best out of any other partnership in the state.

These proposals to reduce egg take ability, and hamstring the hatchery programs would cut this valuable component to the Kodiak salmon fishery, without any measurable benefit to wild stocks anywhere in the state.

I respectfully request you **reject Proposals 170, 171, and 172.**

Thank you for your time and consideration, and your service to Alaska.

Sincerely,

Nate Rose

Nate Rose  
Kodiak, AK, 99615

March 2, 2026

Art Nelson  
Alaska Board of Fisheries  
Alaska Department of Fish and Game, Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Re: Withdraw my support for Proposal 168, request support for Proposal 167

Madam Chair and Members of the Board:

As the author of **Proposal 168**, I withdraw my support for this proposal and respectfully request the Board focus your attention to **Proposal 167**.

Thank you for your time and consideration to this matter.

Nate Rose



March 2, 2026

Dear Members of the Board of Fisheries:

My name is Richard Roth. I am a commercial fisherman and own and operate the F/V Sea Tzar with my wife and five children. We seine for salmon around Kodiak Island and split time between our remote cabin near Larsen Bay and the fishing season aboard our vessel.

Reducing hatchery production would significantly reduce our income, particularly in years when wild returns are low. Hatchery returns help us remain financially stable and make ends meet during difficult seasons.

Coastal communities throughout Alaska are closely tied to the fisheries. Less fish means less money circulating through communities and the state. I support long-term sustainability and believe that thorough research and clear evidence should precede any major regulatory changes.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Richard Roth  
Homer, Alaska / Larsen Bay, Alaska  
capt.richardroth@yahoo.com

**Submitted by:** Steven Roth

**Community of Residence:** Homer

Steven Roth

I have been fishing for over 40 years in the salmon fishing Industry.

I Support HB33, if we take away the advice of those who know the area and the fishery, we are taking away the ability to hear from those who know it best, I don't ask a Airplane mechanic to fix my electrical problems at my house.

This seems like a practical and sensible way for all fisheries and user groups to be properly represented by public servants that they elected.

I fully support HB33!!!

Thank you.

Steven Roth

**Submitted by:** William Roth

**Community of Residence:** Homer

Proposal 168 Support

Reason: Makes enforcing fishing regulations simple and concise.

PROPOSAL 170: Strongly oppose

Reason: Affects the greater economy of Alaska and fiscal budgets in a negative manner and is not backed by any science or departments.

Proposal 171 Strongly oppose

Reason: Data collected to support this was collected a decade ago, with no proof of negative impact on wild stock.

Proposal 172 Strongly Oppose

Reason: Chum Salmon and Pink Salmon Make up Huge economic impact for commercial fishing, this proposal would have a vast impact on the state economy, and is bias considering that no mention of sockeye king or silver hatcheries is mentioned, if founded in science and a legitimate concern over hatchery fish was a concern for sustainability of wild stocks the kings, coho and sockeye species would be included in this proposals, but since the commercialized sport industry finds very little value in these species they want the other user groups who rely heavily on these species to be shut down.

Proposal 173 Support

Reason: Good housekeeping of current regulations.

Support 176 Support

This helps with regulation and enforcement, making current regulations simple and easy to follow.

Proposal 177: Support

Vessel pool bag limits

Simplifies regs and rules, probably happens a lot currently anyways and makes it simple and clear. However needs to be amended, where crew and captain if under hire are excluded from vessel bag limit

Proposal 178: Support

Reason: is poorly written and defined, proposal 177 takes its place which i support

Proposal 173: Support

Simplifies rules for enforcement, it is an unnecessary regulation, less pollution is always a good thing and this accomplishes this and gives no major advantage to fishermen.

Proposal 186 Strongly Opposed

No Science backing this, and a large opinion pointing fingers at user groups with no data to back it up. Negatively affects the local businesses and economy.

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PC417

**Submitted by:** Revelle Russell

**Community of Residence:** Homer

RE: Opposition to Proposal 186-Upper Cook Inlet Drift Gillnet Restrictions

My name is Revelle Tad Russell. I live in Homer, AK. I have been commercial fishing, my main source of income, since 1994. I have been a Upper Cook Inlet Permit holder and owner/operator since 2010.

I respectfully request the Board defer acting on Proposal 186 until its regular cycle, and consider it at its March 2027 meeting.

This is an allocative issue and not a conservation issue and should not be brought up out of cycle.

Cohos in UCI are NOT a stock of concern. Both escapement goals (CEG) for the Little Susitna and the Deshka have been incomplete in in the last 7 of 10 years. The other two CEG systems are Jim Creek and Fish Creek. Jim Creek has exceeded or was within its CEG 23 out of the last 29 years. Fish Creek was the same for 27 of the last 29 years. This does not constitute permanently closing an entire area.

Proposal 186 does not meet requirements for Agenda Change Request (ACR).

When a Board of Fish member goes on public record saying "I do not want see setnets in the Inlet again - If i had my way, there'd be no setnets in the Inlet period, Drifter or setnets." When such comments are made its hard to see Proposal 186 as a conservation issue, based on science, and not an allocative one. If anything is seems punitive.

Proposal 186 is allocative and belongs in the regular cycle and should be heard next year in the regular Upper Cook Inlet cycle.

Thank you.

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PC418

**Submitted by:** Justin Ryan

**Community of Residence:** Cordova

I adamantly oppose proposals 170 and 171. These are basically the same proposals they put in every year without evidence not supporting documents to show what they believe. Past boards have said they wanted to evidence to support the claims. No new evidence has been presented. They are simply throwing darts at the wall hoping the new makeup of the board will get tricked by their conjecture. I personally think these proposals are insulting to board members to have to waste their time on them without new evidence. They don't have new evidence because

evidence does not exist. They like to use percentages in these proposals to try and trick and mislead you. Proposal 171 cited a study done from 2014-2018 saying 22% of a streams were pws hatchery fish. 22% sounds like a lot until you realize the total number of fish was like 400 fish. So 88 hatchery pinks. It's not a percentage that stays consistent with higher numbers of Cook Inlet fish. 88 hatchery would be the total if it was 10,000 Cook Inlet fish. Ask them to give you the numbers for lower Cook Inlet fish for 2025. To me there is a reason they are using data from 14-18 because they can mislead it to fit their agenda but more recent data doesn't support it so they can't include it. More recent data would show much much lower than 2% straying so they have to disregard that. More importantly than the lack of data is the amount of people this would affect if either of these were to pass. Fishermen would lose income, hatcheries would have to cut production which would cause them to cut jobs. Many of these hatcheries are already operating in slim margins and a 25% reduction would be devastating for them. The commercial fishing industry supplies to much work on so many levels. Deck hands, net menders, mechanics, engineers, boat builders, cannery workers, marketing teams, truck drivers, etc, etc. The hatcheries alone have huge numbers of employees. Hire contractors to do specialized work. Bring in mechanics. Bring in engineers. Pay for permits. Work with the coast guard and the department to do things the right way. You're not talking a handful of commercial fishermen losing income, you're talking potentially thousands of people losing jobs and income. Hatcheries also support subsistence users and sport fishermen. Hatchery fish can and do get caught by many subsistence fishermen who wouldn't have as easily accessible salmon. Sport and subsistence fishermen up and down the copper river benefit from the Gulkana hatchery putting out red salmon. Hatcheries were started because these same wild stocks were failing. Subsequently the wild stocks improved. Some would say the hatcheries enhanced the wild runs. Now hatcheries haven't been doing as well and neither have the wild runs. I personally think it's pretty obvious that ocean conditions are what affects both hatchery and wild runs. Some of the biggest returns for hatcheries also coincided with big returns for wild salmon. Some of the worst returns for hatcheries also coincided with bad returns for wild salmon. Ocean conditions change over time and when they are good for salmon we have big runs like we did in the past and then when ocean conditions are bad for salmon we have bad runs like we have been having in recent years. There is credible evidence that shows the trends of overall ocean temperature affecting salmon and that those temperatures are due to return to levels that are good for salmon. I strongly believe in the coming years that wild stocks and hatchery stocks will

Improve with the ocean conditions. Make a rush to judgement and cut down hatcheries and you'll just undermine what was going to happen naturally. I implore the board to use reality, logic and understanding of the evidence to shoot down this proposal. If you do feel like you want to support it, do yourself and all user groups a service and request better information and evidence like past boards have. If/when they don't/can't provide it you basically have no choice but to shoot down these proposals. Remember, these aren't about your personal opinions and beliefs or mine, these are for what is for the betterment of everyone and everything involved. These proposals are not only short sighted but selfish in nature.

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*Submitted via online port*

March 2, 2026

Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, Alaska 99811

**Re: SalmonState comments regarding Proposals 163, 164, 165 for the 2026 Statewide Finfish Board of Fisheries meeting**

Dear Chair Carlson-Van-Dort and Board Members,

SalmonState urges the Board to pass Proposals 163-165, which would provide the ADF&G the tools to better manage trawl fisheries in state waters. In creating ADF&G, the Alaska State Legislature charged the department with the obligation to “manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state.”<sup>1</sup> In turn, the Board of Fisheries was established “for the conservation and development of the fishery resources of the state.”<sup>2</sup> ADF&G and the Board also have a public trust responsibility under the Alaska Constitution Article VIII Section 4, to maintain fish and wildlife under the “sustained yield principle.” These Constitutionally mandated responsibilities require ADF&G and the Board to create e fishing and hunting regulations that protect fish resources for the benefit of Alaskans. Proposals 163, 164, and 165 provide ADF&G the tools to better fulfill these statutory and Constitutional obligations.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a salmon state by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

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<sup>1</sup> AS 16.05.020(2)

<sup>2</sup> AS 16.05.221(a)

Alaska's fishing communities and Alaska Native people are suffering from adverse impacts of diminishing fish populations, climate change, and management inaction. Subsistence fishers, small boat (under 250ft) direct fishery participants, and sport fishers have lost access and opportunity to entire fishing seasons because of declining runs of Chinook and chum salmon, halibut, herring, and crab populations. However, these conservation actions are not equitably distributed across all Alaska fisheries. Currently, the trawl industry continues to bycatch fish species that other fisheries are prohibited from taking including Chinook and chum salmon, halibut, and snow crab. These trawls also continue to drag gear on the seafloor, impacting important benthic habitat.

Rising ocean temperatures are altering the marine ecosystem and changing fish species distribution and productivity, leading to a series of cascading impacts to the marine ecosystem and those who depend on its resources. To alleviate some of the strain on local fishing communities, SalmonState requests this Board approve Proposals 163, 164, and 165 to provide ADF&G accountability and enforceability in the state managed and parallel trawl fisheries.

Trawling is an indiscriminate method of fishing, which hauls huge nets through the water and often scraps the ocean floor. While fishing, these nets catch everything in their path, whether it's the target fish or not. There are extensive studies and research that show trawlers that drag the bottom of the ocean floor are highly destructive, contribute to climate change, and are, metaphorically, like clear cutting virgin forests.<sup>3</sup> In recent years, multiple countries highly dependent economically on commercial fishing such as the Chile,<sup>4</sup> Greece,<sup>5</sup> the United Kingdom,<sup>6</sup> and Sweden,<sup>7</sup> have banned or are phasing out bottom trawling in their waters to protect important habitat and species. Alaska and the United States cannot continue to turn a blind eye to the impacts trawling is having on our marine fish species and benthic habitat.

Alaskans, coastal and interior, are deeply concerned with the impacts of trawling on the marine ecosystem, non-target fish species, and Alaskan communities. According to a poll conducted by SalmonState regarding fishing issues facing Alaska, 74% of Alaskans support a ban on bottom

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<sup>3</sup> *Bottom trawling releases as much carbon as air travel, landmark study finds*, The Guardian, March 17, 2021, <https://www.theguardian.com/environment/2021/mar/17/trawling-for-fish-releases-as-much-carbon-as-air-travel-report-finds-climate-crisis>

<sup>4</sup> Moniz, Rhonda, *Chile bans bottom trawling in vulnerable areas*, Marine Technology News, January 29, 2013, <https://www.marinetechologynews.com/blogs/chile-bans-bottom-trawling-in-vulnerable-areas-700331>

<sup>5</sup> *Greece bans bottom trawling in all Marine Protected Areas*, Oceanographic, April 25, 2024, <https://oceanographicmagazine.com/news/greece-bans-bottom-trawling-in-all-marine-protected-areas/>

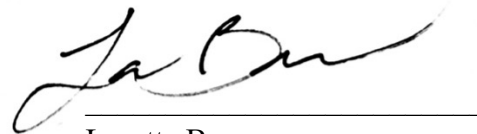
<sup>6</sup> *Total ban on sandeel fishing and partial ban on bottom trawling announced in the UK*, Oceanographic, January 31, 2024, <https://oceanographicmagazine.com/news/ban-on-sandeel-fishing-announced-in-uk/>

<sup>7</sup> Struna, Hugo, *Sweden bans bottom fishing in territorial waters*, Euractiv, June 4, 2024, <https://www.euractiv.com/section/agriculture-food/news/sweden-to-ban-bottom-trawling-in-territorial-waters/>

trawling in Alaska waters.<sup>8</sup> Polling done by the Data for Progress regarding a wide spectrum of political issues of concern for Alaskans in March 2025, also shows 74% of Alaskans support a ban on all trawling.<sup>9</sup>

SalmonState urges the Board to approve Proposals 163-165 and update the management of the trawl fisheries in a manner that provides clarity and transparency for the ADF&G and the public, as well as protecting important fish species and habitat from the destructive nature of trawl gear. Alaska's fish and wildlife resources and protection of their habitat is vital to the future prosperity of the state and its residents. Thank you for your time and consideration of these proposals. Please contact Loretta Brown at [loretta@salmonstate.org](mailto:loretta@salmonstate.org) with any questions regarding these comments.

Sincerely,



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Loretta Brown  
Legal and Policy Analyst  
SalmonState

*Sent via electronic mail:*

Marit Carlson-Van-Dort, [marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

Gerad Godfrey, [g.godfrey@alaska.gov](mailto:g.godfrey@alaska.gov)

Mike Wood, [mike.wood@alaska.gov](mailto:mike.wood@alaska.gov)

Tom Carpenter, [tom.carpenter@alaska.gov](mailto:tom.carpenter@alaska.gov)

Greg Svendsen, [greg.svendsen@alaska.gov](mailto:greg.svendsen@alaska.gov)

Curtis Chamberlain, [curt.chamberlain@alaska.gov](mailto:curt.chamberlain@alaska.gov)

Olivia Henaayee Irwin, [oliviahenaayee.irwin@alaska.gov](mailto:oliviahenaayee.irwin@alaska.gov)

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<sup>8</sup> Bycatch survey results, 2025, <https://salmonstate.org/bycatch-survey-results>

<sup>9</sup> Data for Progress Survey, March 2025, Page 11,  
[https://www.filesforprogress.org/datasets/2025/3/dfp\\_alaska\\_2025.pdf#view=fitH](https://www.filesforprogress.org/datasets/2025/3/dfp_alaska_2025.pdf#view=fitH)

**Submitted by:** Alex Sanarov

**Community of Residence:** Homer

I Oppose 186, it's out of cycle

it was opposed by the Department and most of the public input was against it

- there was no map of what area is intended to be closed
- there is no biological reason for this, there is no data
- there are over 1,200 silver streams in Upper Cook Inlet, the two they used as indicator streams in the Valley are the only two systems that did meet their silver count last year. And where are the #s coming from... with all this technology and still cant put counters up earlier to count the fish.

**Submitted by:** Alex Sanarov

**Community of Residence:** Homer

Proposal 186,I would 100% deny this Proposal because it does not meet Agenda Change Request emergency requirements, Opposed by ADF&G in Staff Comments on ACR 5, No conservation concern, about and it and where they keep finding these numbers.

Highly allocative.

Taken up out of cycle, just out of nowhere closing down area 1 and 2. Tell me where the coho #s are coming from, back in the days they had numbers on each species , and now with all this technology and still dont know how much cohos are going up the rivers and only know the kenai river, and kasilof river.... put a fish counter early as possible and you'll know exactly how much fishing are going up the rivers, not guessing #s, or putting a number out there and what is the catch limit. Start your counting in May and therez plenty of fish going up rivers

Back door votes occurring, between board members which is ridiculous.

Turned into a board generated proposal with no public input, with all that said everyone needs an input before shutting down fisheries with over excapment goals even higher what they need!!

**Submitted by:** Dennis Sanarov

**Community of Residence:** Homer

Proposal 186...

I Oppose the 186!!!! It does not meet the agenda change request emergency requirements. Turned into a board generated proposal with no public input, which is BS! Its Highly allocative



**Submitted by:** Jed Sapp

**Community of Residence:** Cordova, AK

My name is Jed Sapp. I was born and raised in Cordova and am a lifelong fisherman. I grew up fishing with my dad, and have spent 6 years running my own gillnet operation in Prince William Sound.

Proposal 170: I oppose proposal 170

Hatchery systems are far better managed through precision adjustments based on regional, biological data, research and development.

Proposal 171: I oppose proposal 171

Wild salmon naturally stray, but blunt cuts don't address root causes. Improved imprinting and release techniques offer much stronger outcomes.

Proposal 172: I oppose proposal 172

Hatchery systems are far better managed through precision adjustments based on regional biological data, research and development.

Proposal 187: I oppose proposal 187

No conservation or access concern exists here. This would close traditional fishing opportunities in favor of sport users that currently have no problem catching full limits.

For other proposals:

I support Proposal 164 – Establish bottom contact monitoring for pelagic trawl gear,;

I support Proposal 165 – Require salmon excluders for pelagic trawl gear,;

I support Proposal 174 – Seine vessel/skiff engine operation requirements,;

I support Proposal 175 – Dipnet mesh and configuration requirements:

I support Proposal 180 – Annual Chinook bag limit of 5 for sport fish:

Thank you,

Jed Sapp

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March 2, 2026

Dear Members of the Board of Fisheries:

My name is Albert Schmeil. I am a commercial salmon fisherman in Kodiak and operate two salmon seine vessels and a salmon tender.

With fewer returning fish, fishing days would be reduced and income would decline significantly. These proposals would directly affect Kodiak's economy and result in major losses in fishing opportunity in the region.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Albert Schmeil  
Kodiak, Alaska



**Submitted by:** Michael Schoessler  
**Community of Residence:** Soldotna

The only reason trawl should be inside 3 miles from shore is to go to the harbor. Trawl devastates, through bycatch, many near-shore fish. Over the past four years the resident sport fishermen and charter fleet have seen cuts in rockfish retention. Fish and game blames it on the resident and charter fleet but, not the trawl bycatch. F&G gets recorded rockfish catches from the charter fleet but, not so much from the trawl fleet. My opinion is that trawl has no business in PWS either. Is AKF&G trying to decimate the fish populations?

Also, having multiple pink salmon hatcheries is ridiculous! Cut them back to two for four years and see if the chinook and chum rebound.

As for trawl, either get the Gulf of AK fleet 100% monitored or flat out ban them in State waters. It's terrible to see the damage trawl has caused, over the years.

**Submitted by:** Jon Schwartz  
**Community of Residence:** Palmer

Stop trawling in AK waters. AK constitution states resources to be protected and managed for residents/subsistence... not out of state enterprises or commercial interests. Kings and chums will either go extinct or can follow the turnaround seen in South America. I want my children to experience sport and subsistence fishing and expect leaders to protect these resources for future generations.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Andrew Scudder, and I am a commercial salmon seine fisherman in Prince William Sound. I operate the F/V Gorbusha. My family's livelihood and annual income are directly tied to the stability and predictability of salmon returns in this region. I participate in the common property fishery and operate as a small business owner whose revenue, crew employment, and annual planning depend on consistent harvest opportunities supported in part by Alaska hatchery production.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If hatchery production were significantly reduced, it would directly affect my income stability and my ability to plan and operate responsibly. Before each season, I commit to fuel purchases, gear upgrades, maintenance, insurance, and crew agreements. Those costs do not go down if production goes down. What changes is the level of risk I am carrying. Hatchery fish are not extra fish to me — they are part of what makes the season predictable enough to operate a business. They help smooth out the extreme highs and lows that come with wild stock variability. Removing that stability increases financial volatility and makes it harder to support my crew and my family. It also makes it harder to justify long-term investments in my vessel and permit.

In Prince William Sound, hatchery production is tied into the broader economic structure of the region. If production is reduced significantly, harvest opportunity drops. When harvest drops, processors see less throughput, crew members lose income, tenders haul fewer fish, fuel docks sell less fuel, and local marine businesses lose work. This fishery supports more than just permit holders. It supports deckhands, plant workers, transport companies, and coastal communities that depend on seasonal income. Reducing production would ripple through that entire system.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Andrew Scudder  
Idaho



PC427

**Submitted by:** Alex Senta

**Community of Residence:** Eagle river

Please adopt proposal 186. Any help the salmon can get to increase passage to the northern inlet freshwater locations will benefit all Alaskans. The stocks in these areas have dropped immensely in my lifetime. I grew up with plentiful numbers of salmon in little su, Deshka, Jim creek and others and something needs to be done in the salt water. Fresh water management cannot make enough difference when unsustainable harvest occurs in the inlet before they return to spawn.

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PC428

**Submitted by:** Christopher Shelborne

**Community of Residence:** McGrath

Proposal 11 Trawlers shouldn't be doing any dragging of the ocean floor. In fact they shouldn't be allowed to that close to Alaska's shores to begin with. If we fail to protect our offshore ecosystem then we fail to steward a viable and sustainable ocean environment for my children living here in Alaska. The damage done cannot be reversed. As a lifelong Alaska of four generations, I implore you not to keep going down this road. What a Hawaii allow a troller to drag over its underwater habitats? Good God, why are we even having to discuss this? Give back these greedy profiteers' blood money before it's too late.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Antonio Silva, and I am a commercial fisherman, floating processor, local business owner, personal use and subsistence user, sport fisherman, lifelong Alaskan, and resident of Wrangell, Alaska. I am the owner and operator of Silva Seafoods LLC and the F/V Danegeld.

I am writing to urge the Board to reject Proposals 170, 171, and 172. My business and my family's income rely heavily upon the hatcheries throughout Alaska, specifically in Southeast Alaska. Through the constant monitoring of Fish and Game biologists, we commercial fishermen harvest predominantly hatchery-raised wild salmon throughout the summer, which is a significant source of our family's income. The hatchery fish are also a significant source of our family's food throughout the year. I would not be able to operate my business without the hatcheries in Southeast Alaska, and I fear that due to rising operational costs, a reduction of this magnitude would cause them to scale back so tremendously that I would no longer be able to support my business and my lifestyle in Southeast Alaska.

Any reduction in hatchery production can and will cause catastrophic damage to the hatchery programs' production and operational costs, which will directly affect all of us — commercial fishermen, subsistence users, processors, and all communities in Southeast which support thousands of independent small businesses related to the harvest or consumption of local wild-caught salmon.

This would impact every business related to the catching, processing, and retailing of all salmon regionally, statewide, and nationwide. It would cripple Southeast Alaskan communities and destroy an already struggling fishing fleet, all without any Alaska-specific causal evidence.

The Marine Mammal Protection Act has allowed predatory mammal populations to flourish. These mammals are not managed through ADF&G and consume a significant amount of salmon while they are at the most critical point of their life cycle — heading upriver.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Antonio Silva  
Wrangell, Alaska







[REDACTED]

[REDACTED]  
Sitka, Alaska 99835[www.silverbayseafoods.com](http://www.silverbayseafoods.com)

**March 2, 2026**

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Re: **Oppose Proposals 163-165**

Dear Chairwoman Carlson-Van Dort and Board Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company with operations in Kodiak and False Pass, as well as plants across the State of Alaska. Thousands of Alaska residents rely on our company for direct employ or as independent fishermen operating all gear types. Consistent markets, employment, and availability of operations are critical to the benefits we bring to our partners and Alaska's communities. **Silver Bay Seafoods strongly opposes proposals 163, 164, and 165.**

These measures will not improve fisheries but only further restrict trawl fishing, directly threatening Alaska fishermen, residents, and coastal communities. The effects of these actions will extend beyond trawl operations, as fishermen and processors both rely on portfolios of fisheries to support their operations. Removing important fisheries from those portfolios (as the proposals are likely to do) will leave gaps in seasonal calendars reducing workforce size and operations in periods that other fishermen depend on. These overall reductions will have consequences for

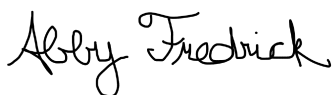
communities and their residence who rely on the activity from fisheries to support their economies.

The proposed measures will require the development of technologies and regulatory monitoring systems not currently in existence imposing enormous costs on both Alaska Department of Fish and Game and the fishing industry. The consequence will be either fisheries discontinuing because of overly burdensome regulations or ineffective and unenforceable regulations. In either case, the costs will greatly outweigh any benefit.

Communities in the Western Gulf of Alaska and Central Gulf of Alaska rely heavily on trawl fisheries to support local fishermen. Kodiak has a strong local processing workforce with many residents who rely on year-round plant employment to maintain their residency. Undercutting the trawl fisheries – as these measures would do – would jeopardize their ability to remain in Alaska’s coastal communities. We strongly urge the Board to reject these proposals due to the damage that they would impose on Alaska’s fishermen, workers, and coastal communities.

Thank you for considering our comments.

Respectfully,



Abby Fredrick

Vice President External Affairs





[REDACTED]

[REDACTED]  
Sitka, Alaska 99835[www.silverbayseafoods.com](http://www.silverbayseafoods.com)

**March 2, 2026**

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: **Oppose** Proposals 170-172

Chair Carlson-Van Dort and Board Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company partnered with fishermen participating in Southeast, South Central, and Kodiak, Alaska enhanced salmon fisheries. **We are aligned with fishermen, coastal communities, and ADF&G; we oppose proposals 170-172.**

We support Alaska's outstanding hatchery program, which is rooted in strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies that protect wild salmon populations. The hatchery program has demonstrated over 50 years of sustainable enhanced production to supplement our wild stocks, providing economic opportunity and food security to all users. A McDowell Group report identifies the economic contribution in 2018 of Alaska's salmon hatcheries to be 4,700 jobs, \$218 million in labor income, and \$600 million in total economic output. As a percentage of statewide harvest value, hatchery-derived salmon represents 22 percent of total salmon ex-vessel value over the study period. This percentage ranged from a high of 28 percent in 2013 to a low of 15

percent in 2016. Overall, hatcheries are a critical component of coastal fishing economy and any unwarranted reduction in opportunity could have a significant impact on the stability of these independent small businesses.

Hatchery production is managed through a rigorous public permitting process which involves many stakeholders and Alaska Department of Fish and Game (ADF&G) experts from multiple disciplines. Alaskans have rejected similar proposals during the regional plan team meetings and at the Southeast, Prince William Sound, and Kodiak board of fisheries meetings in recent years. Acting on these issues at a statewide meeting completely undermines the thousands of voices who support Alaska's hatchery program and the judgement and precaution exercised that has allowed the program to bring great benefits to Alaskans.

ADF&G opposes proposals 170-172 because it will permit only hatchery operations that minimize impacts on wild salmon stocks, and the commissioner will amend a permit if conservation concerns arise anytime a conservation concern arises. ADF&G staff comments also address the misinformation about Alaska's hatchery and wild salmon interactions and the misapplication of outside studies to our program stating: "Although there are a significant number of publications on interactions between hatchery production and wild stocks of salmon, very few are directly applicable to Alaska's salmon populations." Alaska's hatchery program was built to avoid issues that have arisen in other states and has been a success story for adaptive and sustainable fisheries management.

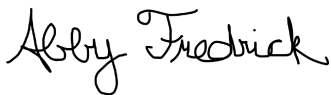
It must also be recognized that salmon enhancement under the hatchery can be an important tool for addressing wild king salmon conservation issues. In Southeast Alaska, several king salmon stocks were listed as stocks of concern between 2017 and 2021. This required strict conservation measures to be put in place for sport and commercial fisheries to protect those stocks. ADFG wisely targeted recreational fishing opportunities on hatchery king salmon in terminal harvest hatchery release areas, conserving wild stocks in nearby areas to meet escapement goals. By 2024, three of the stock of concern listings have been lifted, with wild king salmon stocks continuing to

meet escapement goals. In areas with stocks in decline, such as the Interior and South Central, hatcheries may be an important tool to consider to refocus effort in a way that aids in the recovery of depressed stocks. Proposals that limit Alaska's ability to use this tool to respond to stock status changes seem unwise and unnecessary. The proposals at issue undermine Alaska's longstanding trust in its ADF&G Commissioner and staff, who allow only hatchery programs that support sustainable fisheries and yield benefits for Alaskans.

Alaska's hatcheries are well managed under the ADF&G Commissioner's authority, they provide significant economic opportunities, and are one of the few tools available for providing opportunity while we address low salmon production. **Please take no action on proposals 170-172.**

Thank you for considering our comments.

Respectfully,



Abby Fredrick

Vice President External Affairs





SITKA, ALASKA 99835

MAIN: [REDACTED]

FAX: [REDACTED]

SITKATRIBE.ORG

February 5, 2026

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

RE: Comments for 2026 Statewide Finfish Meeting

Members of the Board of Fisheries,

I write on behalf of the Sitka Tribe of Alaska (STA), a tribal government in Sitka, Alaska, with over 4,881 tribal citizens. As a tribal government, STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens. STA submits the following comments on statewide proposals 176, 177, 179, and 180.

#### **Proposals 176 and 177**

STA **opposes** proposals 176 and 177. Charter operators currently harvest the majority (ADFG 2025) of sport king salmon allocation within the waters of Southeast Alaska. STA expresses concern that allowing saltwater charter vessels to pool bag and possession limits will likely increase non-resident harvest of king salmon, resulting in additional time and area closures and reducing the availability of king salmon for Tribal Citizens and Alaska residents.

Proposal 177 does not address how pooled bag and possession interact with annual limits. Additionally, neither proposal addresses the complications that combining limits that arise with groups containing a mix of Alaska residents and non-residents.

#### **Proposals 179 and 180**

STA **opposes** the establishment of a yearly bag and possession limit for king salmon for Alaska residents. It is unclear how the limits suggested in each proposal were determined and how they may change as king salmon productivity changes over time. Additionally, resident anglers currently make up the minority of king salmon harvest in Southeast Alaska. Establishing an annual limit would add additional burden to resident anglers and reduce their ability to provide fish for themselves and family. Lastly, establishing an annual limit would conflict with the Southeast

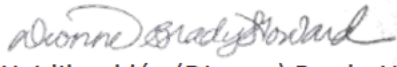


[REDACTED]  
SITKA, ALASKA 99835  
MAIN: [REDACTED]  
FAX: [REDACTED]  
SITKATRIBE.ORG

Alaska King Salmon Management Plan 5 AAC 47.055, limiting harvest for resident anglers regardless of king salmon abundance.

Please contact Jeff Feldpausch, Resource Protection Department Director, at [REDACTED] or email [REDACTED] with any questions. Thank you for your thoughtful consideration.

Sincerely,

  
Yeidikook'áa (Dionne) Brady-Howard  
Tribal Council Chairwoman

Tydingco, T. Pawluk, J. Tugaw, A. Rice, J. 2024. Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries. Special Publication No. 24-19

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is John Skeelee, and I am a commercial fisherman based in Sitka, Alaska. I operate the F/V Sunfish.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I have trolled and gillnetted in Southeast Alaska for a number of years, and I will restrict my comments to the hatcheries in this region — in my case, NSRAA and DIPAC. I feel that both gear groups have benefited greatly because of our revolutionary, fisherman-funded hatchery programs. Regions that produced varying and often low-volume catches have changed into major economic drivers for the adjacent communities. New release sites and egg takes are already highly regulated by the Alaska Department of Fish and Game. I think arbitrary limits on hatchery expansion would be an unnecessary impediment to the efficiency of the programs themselves.

Smaller runs would directly affect my income. Reduced harvest would adversely affect the whole chain — everyone who touches a fish and makes some income from those actions. A reduction in harvest would have serious repercussions, especially at a time of historically low ex-vessel prices.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

John Skeelee  
Sitka, Alaska





**Submitted by:** Dustin Slinker

**Community of Residence:** Anchorage

Proposal 186

Many local anglers have spent years fishing the Matanuska–Susitna Valley drainage of the Northern Cook Inlet, targeting wild Chinook and Coho salmon. Unfortunately, wild salmon populations continue to struggle as they return to the Northern Cook Inlet drainages.

We strongly urge the Board to support Proposal 186 and take action to help restore wild salmon stocks to the Northern Cook Inlet. The coho escapement goals over the past three seasons should be cause for serious concern.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kristen Smith, and I make my living with hatchery fish in Prince William Sound, Alaska, as I have since 2007. I have held multiple positions as a fisherman, tenderman, and processor.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would ruin my livelihood. I hire 20 local Alaskans every year, and these fish are vital to that effort. Making decisions that are not based in science affects our way of life unnecessarily.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kristen Smith  
Prince William Sound, Alaska



**Submitted by:** Tanner Smith

**Community of Residence:** Wrangell Alaska

To: Chairman Carlson-Van Dort and Board Members

Thank you for this opportunity to comment and for making the time to listen.

This letter is to ask you to take a closer look at Proposals 163, 164, 165 in the case of Beam trawling for shrimp.

There is a small group of beam trawl fishermen in mostly in Southeast Alaska that trawl for both Pink and Sidesripe Shrimp (I am one of these fishermen). There are some very important differences between the factory trawlers that I assume these proposals are intended for, and the small "Mom and Pop" beam trawl boats that trawl exclusively for shrimp. Unfortunately, we are both found in the same gear group, and thus this letter.

Proposal 11: This doesn't affect shrimp beam trawlers, so I will refrain from commenting on this.

Proposal 163 and 164: Shrimp beam trawling makes contact with the ocean floor. While one might jump to the conclusion that this is bad, I would like to point out a few things:

1. This fishery is over 100 years old, and the same shrimp trawl drags have been used for decades. We trawl on sandy bottom, usually in close proximity to a river. If a fishery has been successful for this long, in the same exact areas, you might consider it as... sustainable?
2. I have read a few things that once a factory trawler trawls over the ocean floor it can takes years for it to recover its abundance. Shrimp trawling is NOT like this. I can often fish the exact same area/ drag within 2-3 days. And amazingly, shrimp seem to congregate in more abundance on places that are frequently trawled on, verses places rarely fished.
3. Shrimp beam trawlers travel at very low speeds (1.1 to 1.5 knots) compared to factory trawlers that can travel up to 5 knots while fishing. Because of this low speed, the small size of our trawls (less than 60 ft) we NEVER catch salmon, and very rarely catch halibut.
4. Shrimp beam trawls are equipped with fish excluders that keep fish and crab out of the trawl bag. On the rare occasion that a halibut or crab makes it over the fish excluder, it is always alive and returned to the ocean immediately to insure its survival.

I personally have 2C halibut quota, that I have invested virtually years of my life acquiring. I also gillnet for salmon. While I don't crab, I have a lot of friends that do crab. I'm pointing this out to ensure you that I get VERY upset when I read about how much bycatch factory trawlers have, but i can also positively say that shrimp beam trawlers are NOT the problem here.

Proposal 165 is not relevant to shrimp beam trawlers. Although we do have fish excluders we never have salmon bycatch.

Just some thoughts here. Just the talk of closing down the trawl fishery in the state of Alaska this last year and a half has already had tremendous impact on my shrimp beam trawl fishery and my personal life. The limited entry permit I paid for is essentially worthless. No one is going to buy it even if I wanted to sell it. I have probably a \$150,000 of shrimp trawl gear that is only worth something to me because no one will invest in an "unstable" fishery. There are improvements I want to keep making to my boat and gear that I am holding back on because I honestly don't know if this fishery will be around in a couple of years. I constantly have to fight against the stigma that goes with self marketing a product that is "trawl caught", because of its association with a group of fishing boats that fish for different products, with unsustainable methods, that are a thousand miles away from me. My hope is that you will separate shrimp beam trawlers from the factory trawlers, especially the Amendment 80 fleet (which is the real problem), with rules that make sense for each unique fishery.

Thank you for your consideration

Tanner Smith, FV Netted Dreams

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Thomas Smith, and I am an 18-year-old studying aquaculture and mariculture in Sitka, Alaska. My family has been fishing in Alaska since time immemorial, with our most recent memory being my great-grandfather who fished Bristol Bay by sail. I started working with salmon before I could walk and pulled in a five-pound fish when I was four. I started working in hatcheries last year at 17. These fish hold immense weight for us Alaskans and provide substantial income for the state. The hatchery system has eased pressure on wild stocks while simultaneously providing the needed fish to sustain fisheries since the founding of Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These reductions would shrivel industries that rely on these fish to feed their families. Not only that, but these reductions can easily put major pressure on sustained wild stocks, hurting not only the fishermen but the subsistence users who have been here for millennia. That is not the right thing to do.

Sitka especially is a very large fishing town in terms of Alaska, supported by four hatcheries on Baranof Island. With cuts to hatchery limits, we will see the decimation of local salmon populations, wild or not.

I personally think focusing on hatcheries diverts attention away from other causes we cannot even see right now. We are still doing research on the marine life of salmon and the complex systems they have developed. We also need to look at the industrial fisheries that destroy migratory patterns and their bycatch. There is so much more research that needs to be done before we can even look toward hatcheries as an issue.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is William Smoker. I am a Fisheries Scientist and Professor Emeritus at the University of Alaska, a community member, and a sport fisherman.

These proposals would result in reduced fishing opportunity and diminished economic opportunity. They would mean loss of jobs, loss of income, and loss of economic opportunity.

They would also increase harvest pressure on wild stocks, as currently harvest is diverted to hatchery stocks in-season by harvest managers. Absent hatchery opportunity, harvesters will increase pressure on wild stocks.

State policy, following law, provides a process based on biological knowledge through the Regional Planning Process for setting limits on hatchery production. There is no basis for short-circuiting this process, which has been successful in maintaining sustainable wild runs for decades and enhancing economic opportunity in Alaska.

Hatcheries provide demonstrable fishing opportunities for the Alaska industry, sport, and subsistence harvesters. Disinterested third parties have, after rigorous review, certified Alaska salmon harvests as sustainable. These reviewers have taken long, hard looks at the effects of hatcheries.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm

coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

William Smoker  
Alaska



**Submitted by:** Charles Snyder

**Community of Residence:** Anchorage, AK

Trawl runs “science” based information to regulate bycatch and allowable quotas for harvesting. Science is a basic fundamental of trial and error. While technology today is far more advanced than 50-60 years ago, trawl has been running our oceans rampart for that long. Trawl needs completely abolished, not only three miles from land and bottom trawlers but all trawling and outside the state jurisdiction. If their science truly is correct then our rivers will continue at its current state. If they are wrong then our fresh water resources will replenish. It needs at least 8 years stopped, Mid water and bottom, for this will be one solid king salmon cycle to the fullest capacity. Trial and error.

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# Southeast Alaska Fishermen's Alliance<sup>PC439</sup>

[REDACTED]  
Juneau, AK 99801

Email: [REDACTED]

Cell Phone: [REDACTED]

Fax: [REDACTED]

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

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February 26, 2026

Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Dept of Fish and Game  
PO Box 115526  
Juneau, AK 99811

RE: Statewide Board of Fish Proposal Comments

Dear Marit Carlson-Van Dort and Members of the Board of Fisheries,

Southeast Alaska Fishermen's Alliance (SEAFA) a multi-gear/multi-species small boat association representing our 300+ members involved mainly in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. We have an approximately 80%+ Alaskan residency. In the salmon division we have members involved in the gillnet, troll and seine salmon fisheries, and some Prince William Sound salmon drift gillnet fishery. The longline division represents SE longline (and pot) fisheries as well as halibut and sablefish quota share fisheries. Most of our membership also participates in personal use, subsistence and sport fisheries as well as taking home fishery resources from their commercial harvest which is documented on fish tickets.

**Proposal #170: OPPOSE** – SEAFA opposes proposal #170 to reduce the permitted egg take of each hatchery permit for pink and chum salmon by 25% of the current permitted capacity. Similar proposals have been introduced for each meeting for several cycles and have all been voted down. SEAFA agrees with RC 2 Staff Comments regarding the Dept of Law Memo on Authority of the Board of Fisheries Over Private Non-Profit Hatchery Production<sup>1</sup>.

Reducing the chums and pinks by 25% would have a very negative affect on the economic stability of the hatchery association, the fishermen, processors and local communities. A change in the status quo would have grave economic impacts on the

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<sup>1</sup> <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/hc/law.pdf>



hatchery association and would in many cases by the equivalent of revoking a permit which is clearly not allowed as per discussion on the Dept of Law Memo.

The reasoning for this action is to minimize the harmful effects of the enhancement of chums and pinks but does not and has not over all the years showed any direct correlation between the Alaska hatchery permitting processes and policies and the studies of hatchery effects from a completely different permitting process. The studies done in Alaska that do focus on wild/hatchery interactions infer negative interaction at sea. The Commissioner of Fish and Game has adjusted hatchery permits when there was a compelling reason based on data that indicates the amendment to the permit would have a reasonable probability of reducing the identified adverse effects on wild salmon.

Southeast Alaska has an allocation plan in place that would be severely disrupted by arbitrarily reducing hatchery pink and chum release by 25%. Many of the SE Hatchery programs were established/developed through funding as a way to minimize impacts from the Pacific Salmon Treaty negotiations. Without the chum salmon programs the coho and chinook programs could not survive.

Reducing the pink and chum program by 25% puts the hatcheries in an economic bind that in turn creates likely defaulted payments to the State of Alaska, Division of Investments.

The framework for revising or developing a hatchery return is public and open but conducted through the Regional Planning Teams with the final decision in the hands of the Commissioner of ADF&G. This was developed that way by the Alaska State Legislature and did not provide the authority for the Board of Fish to issue, revoke or substantially change the conditions of the permit. The authority of the Board of Fish is in regulating "indirect authority over hatchery production by regulating harvest of hatchery release fish in the common use fishery," by regulating "hatchery broodstock and cost recovery harvests," and be regulatory action "amending those portions of hatchery permits relating to the source and number of salmon eggs (taken from the wild) hatchery harvests, and designation of special harvest areas.

Alaska's salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations. Please oppose proposal #170.

**Proposal #171 & 172: OPPOSE** – SEAFSA opposes proposal #171 and #172 which are variations of the previous proposal. See RC2 Staff Comments and our comments above for our reasoning to oppose these proposals.

**Proposal #169: SUPPORT** – SEAFA supports having a clear definition of slinky pots.

**Proposal #176, 177 & 178: OPPOSE** – SEAFA opposes the concept of pooling bag and possession limits of sport caught fish particularly sport fish charter vessels. Pooling bag and possession limits basically provides a loophole for taking more sport fish by providing an opportunity to take additional individual out on the vessel that have no desire to fish so that you can have a greater possession limit. Daily bag and possession limits are a management measure used to control harvest, by allowing pooling of sport fish it would likely lead to an increase in harvest and more restrictive management measures in the future.

**Proposal #181: SUPPORT** – SEAFA supports proposal #181 submitted by ADF&G that aligns regulatory and statutory language for sport fishing gear. Clear and consistent regulatory language helps reduce confusion.

**Proposals #182: OPPOSE** – SEAFA opposes bow hunting for sport fishing without a bag or possession limit. First no new gear type for a fishery should be allowed to exist as unlimited when the other gear types have bag and possession limits. Second, bow hunting has the very big potential to cause harm to fish such as salmon as they are reaching their spawning grounds with missed strikes and harm to the habitat with potential debris from broken gear.

**Proposal #183: SUPPORT** – SEAFA supports maintaining finfish in a manner that allows for determination of size and species until being processed or prepared for human consumption or is an exempt species for use as bait.

Thank you for the opportunity to comment on the Statewide Board of Fish proposals. Please feel free to contact the office if you have any questions regarding our comments on these proposals.

**Proposal #187: OPPOSE** – SEAFA opposes closing the Tsiu River and all waters within one quarter mile of the Tsiu River and Kaliakh River confluence to commercial fishing for salmon. This is a geographical area that is very dynamic and changes sometimes as often as year to year. ADF&G has the ability to adjust fishing line as appropriate when the rivers change by EO authority which they use. The area does not have any conservation concerns and therefore should not be closed to commercial fishing. This proposal was submitted as an Agenda Change Request (ACR) and in the staff comments for the work session, the Dept did not feel this proposal met the requirements for acceptance of an ACR. This is an allocative proposal which is not appropriate to bring up in an out of cycle meeting and why the Dept is neutral on their comments.

Sincerely,

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

Kathy Hansen  
Executive Director



March 2, 2026  
Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
Email [adfg.bof.comments@alaska.gov](mailto:adfg.bof.comments@alaska.gov)

RE: Comments by SEAGO for Statewide Finfish and Supplemental Issues meeting

Madam Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

SEAGO serves as the voice of Southeast Alaska sport fishing operations and their supporters, representing the industry on all vital issues. Our mission is to promote Alaska's tradition of sport fishing through regulations that protect the sustainability of our fish resources, coastal communities, and businesses.

Guided sport fishing in Southeast Alaska supports 1,750 jobs, generates \$65 million in labor income, and drives \$271 million in total spending across approximately 176,000 angler days annually in the region. These impacts extend across Southeast Alaska's working waterfronts and coastal communities, supporting small businesses, air carriers, processors, fuel docks, lodges, and transportation providers throughout the region.

Our region depends on healthy fish stocks and stable, science-based management. Conservation and regulatory clarity are foundational to sustaining both the resource and our communities that rely on it. SEAGO has evaluated statewide proposals through this lens.

### **SEAGO Supports Proposal 176.**

Vessel-level pooling within a clearly defined aggregate limit has the potential to reduce regulatory discard and associated release mortality. Under individual limits, anglers are required to release legally harvested fish once a personal bag limit is reached, even when other anglers on the same vessel have remaining harvest opportunity. These releases can result in avoidable mortality due to handling stress, barotrauma, and post-release mortality.

Allowing retention within a fixed vessel-level cap maintains existing overall harvest ceilings while reducing releases required solely for regulatory compliance.

When implemented with clear and enforceable vessel-level caps, pooling can reduce cumulative release mortality while preserving biological accountability.

### **SEAGO respectfully withdraws Proposal 177 in support of Proposal 176.**

Proposal 176 provides a more complete regulatory framework for vessel-level pooling, including defined limits and guardrails that maintain individual seasonal limits and overall harvest ceilings.

### **SEAGO opposes Proposal 181 as written**

SEAGO requests that Proposal 181 be clarified to ensure that downriggers and power-assisted reels remain clearly authorized under 5 AAC 75.020.

Subsection (d) of current regulation explicitly allows power-assisted fishing reels subject to mounting and weight requirements. Proposal 181 does not appear to amend that subsection, and SEAGO supports retaining this language without alteration.

The proposal references questions regarding gear attached to drones, radio-controlled devices, or downriggers. As drafted, the language could create unintended ambiguity regarding the continued lawful use of downriggers, which have long been part of Alaska's sport fishing practice.

To avoid uncertainty in interpretation or enforcement, SEAGO requests that final regulatory language should explicitly preserve the lawful use of downriggers as part of a closely attended sport fishing line.

**SEAGO opposes Proposal 170.**

This proposal would impose a uniform 25 percent reduction in permitted egg take levels for pink and chum salmon hatchery programs statewide. This proposal applies a blanket reduction without Alaska-specific findings demonstrating that such action is biologically necessary across regions or facilities.

In Southeast Alaska, chum production provides the financial foundation of the hatchery system. Revenue generated from those returns supports ongoing operations, including the more costly production of Chinook salmon. Hatcheries in the region annually release approximately 10 million Chinook salmon, including roughly 2.5 million designated to support sport fisheries. Hatchery-origin Chinook account for up to 50 percent of the harvest near Juneau and approximately 30 percent near Ketchikan.

Reducing chum egg take could directly affect the revenue that sustains Chinook production, potentially diminishing harvest opportunity and increasing pressure on wild stocks without a demonstrated biological trigger tied to current Alaska data. SEAGO supports continued evaluation of hatchery-wild interactions through structured, Alaska-specific scientific review.

SEAGO remains committed to conservation-driven, science-based fisheries management. The long-term health of Alaska's fish stocks is foundational to the stability of our coastal communities and working waterfronts. We appreciate the Board's thoughtful consideration of these proposals and stand ready to continue constructive engagement in support of responsible stewardship.

Respectfully,

Kim Landeen  
Finfish & Statewide Director  
Southeast Alaska Guides Organization

Forrest Braden  
Groundfish & Federal Director  
Southeast Alaska Guides Organization

**Submitted by:** Philip Doherty  
Southeast Alaska Seiners Association (SEAS)

**Community of Residence:** Ketchikan

March 17–21, 2026

Statewide Finfish and Supplemental Issues

Proposals 171 and 172 - Oppose

The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to Proposals 171 and 172.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve a fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.

**Submitted by:** Philip Doherty  
Southeast Alaska Seiners Association (SEAS)

**Community of Residence:** Ketchikan

The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to Proposal 170 which would reduce SE AK hatchery production by 25%.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve a fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.


- The Private Non-profit hatchery programs are stakeholder driven and overseen by fishermen who strongly support Alaska's mandate to protect wild stocks.
- In SE AK, hatchery genetic policies prioritize using local broodstock to maintain genetic diversity within wild salmon populations, meaning hatcheries primarily collect eggs from fish originating in nearby streams to minimize genetic impacts on wild stocks when hatchery fish stray back to spawn; this is done to protect the integrity of wild populations and is a key component of the Alaska Department of Fish and Game's (ADF&G) broader genetic policy for salmon hatcheries.
- The highest priority of the Alaska hatchery programs is to protect and maintain wild stocks. All common property fisheries in SE AK are targeted on wild stocks. Hatchery produced salmon are caught incidentally during those common property fisheries. The only targeted fisheries for hatchery salmon are conducted in the Terminal Harvest Area.
- In SE AK there is an allocation plan in place for the distribution of hatchery fish (5AAC 33.364). The troll fishery is below their allocation, the gillnet fishery is above their allocation, and the seine fishery is within their allocation. The allocation regulation is based on historical hatchery production. If there are significant changes to hatchery production the Board of Fish will have to re-exam the allocation plan.

- Colonization (or straying) is a natural part of the salmon life cycle, so hatcheries are required to use locally adapted stocks from nearby rivers and streams to maintain the natural genetic mixing of salmon populations within an area.
- There is some “straying” in wild stock salmon. Is the rate of “straying” in hatchery produced salmon any different than in wild stocks?
- Reduction of hatchery produced salmon would put extra pressure on wild stocks. ADF&G salmon managers would have to deal with more boats fishing in common property fisheries as those boats may not have the options of fishing in Terminal Harvest Areas during common property fisheries.
- Alaska’s salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations.
- Reducing hatchery production by 25% would have negative economic consequences for all user groups, processors, and communities in SE AK. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact numerous SE AK charter operations and lodges.
- Cutting production of pink and chum salmon would significantly reduce these revenue streams making it difficult, if not impossible, to meet State of Alaska Fisheries Enhancement Revolving Loan Program repayment obligations.
- Reduced production would be a financial burden on hatchery operation. Hatcheries may be forced to eliminate more expensive programs that produce chinook, coho, and sockeye salmon.
- There is no evidence that these significant reductions will do anything to address unknown wild salmon interaction concerns addressed by the proposer of 170.
- The Southeast Alaska Chinook Salmon Fishery Mitigation Program was initially established in 2009 as part of the Pacific Salmon Treaty negotiations and was designed to alleviate economic impacts resulting from a 15% reduction in Chinook salmon harvest levels under the 2009 revision to the Treaty. This program continues to be necessary due to an additional 7.5% reduction in Chinook harvest levels under the 2019 revision of the Treaty.

Sincerely,

Phil Doherty

Executive Director – SEAS

  
Ketchikan, AK 99901

---

## **Southeast Alaska Opposition to chum salmon hatchery production reduction by 25%**

### **For Reference - in Opposition to Proposal 170**

Submitted by Southeast Alaska Hatchery Operators – DIPAC, NSRAA & SSRAA

**Proposal 156, a proposal nearly identical to Proposal 170, was put forward in the winter of 2025 at the Southeast Alaska Board of Fisheries meeting in Ketchikan. This proposal was specific to Southeast Alaska and was strongly opposed, as listed below.**

Because proposal 170 is a Statewide proposal, the people of Southeast Alaska are less likely to weigh in for comments. Proposal 170 goes beyond individuals and groups' regional understanding of their "neighborhood" hatchery programs.

As of February 4, 2025, a total of 264 comments were submitted in opposition to Proposal 156. Of these, 195 came from individuals, while 69 were from organizations, including cities, chambers of commerce, economic development councils, tribal entities, the sport/charter industry, the commercial fishing industry, and nearly all Southeast Advisory Committees, except for one, which narrowly voted in favor. Please review the opposition letters from the Southeast Alaska Board of Fish meetings last spring to better understand the sentiment behind these thousands of individuals represented.

*Note: Two comments (PC 529 and PC 156) were mistakenly classified as support but should be recorded as opposition.*

#### **Cities-11**

1. City and Borough of Juneau (PC89)
2. City and Borough of Sitka (PC90)
3. City and Borough of Wrangell (PC91)
4. City of Craig (PC92)
5. City of Kake (PC93)
6. City of Ketchikan (PC94)
7. Haines Borough (PC199)
8. Ketchikan Gateway Borough (PC248)
9. Petersburg Borough Assembly (PC391)
10. Haines Borough Assembly (RC 011)
11. City of Hoonah (RC 088)

#### **Tribes – 7**

1. Central Council of the Tlingit & Haida Indian Tribes of Alaska (PC77)
2. Chilkoot Indian Association (PC82)
3. Huna Totem Corporation (PC225)
4. Ketchikan Indian Community (KIC) (PC249)
5. Metlakatla Indian Association (PC337)
6. Skagway Traditional Council (PC461)
7. Organized Village of Kasaan (RC 087)

**Submitted by Southeast Alaska PNP Operators**



**Charter/Sport Industry- 9**

1. Alaska Charter Association (PC3)
2. Alaska Fly Fishing Goods (PC4)
3. Alaska Reel Adventures (PC10)
4. Angling Unlimited (PC18)
5. Bear Paw Charters LLC (PC35)
6. Eagle Charters, Haley Janttie (PC146)
7. El Capitan Lodge (PC152)
8. Southeast Alaska Guides Organization (SEAGO) (PC469)
9. Territorial Sportsmen Inc (PC499)

**Fish and Game Advisory Committees - 11**

1. East Prince of Wales Island AC (AC2)
2. Elfin Cove AC (AC3)
3. Icy Straits AC (AC5)
4. Juneau-Douglas AC (AC6)
5. Ketchikan AC (AC7)
6. Klawock AC (AC8)
7. Pelican AC (AC9)
8. Petersburg AC (AC10)
9. Prince William Sound/Valdez AC (AC11)
10. Sitka AC (AC12)
11. Wrangell AC (AC14)

**Chambers - 5**

1. Southeast Conference (PC472)
2. Greater Juneau Chamber of Commerce (PC191)
3. Prince of Wales Chamber of Commerce (PC399)
4. Greater Ketchikan Chamber of Commerce (PC192)
5. Wrangell Chamber of Commerce (PC555)

**Economic Development/Other - 4**

1. Ashburn & Mason, P.C. (PC22)
2. Juneau Economic Development Council (JEDC) (PC239)
3. Sitka Economic Development Council (PC458)
4. True North Industries LLC (PC517)

**Commercial Fishing Industry - 14**

1. Alaska Longline Fishermen's Association (PC6)
2. Alaska Trollers Association (PC11)
3. Canfisco Group USA (PC71)
4. EC Phillips & Son Inc. (PC148)
5. OBI Seafoods (PC372)
6. Pacific Seafood Processors Association (PC382)
7. Petersburg Vessel Owners Association (PC392)
8. Phillips Fisheries LLC(PC396)
9. Purse Seine Vessel Owners Association (PC404)
10. Southeast Alaska Fishermen's Alliance (SEAFA) (PC468)

11. Trident Seafoods (PC516)
12. United Fishermen of Alaska (PC522)
13. Yakobi Fisheries (PC558)
14. Seafood Producers Coop (RC 086)

**PNP Hatchery Operators – 8 letters (7 operators):**

1. Alaska PNP Hatchery Operators (PC9)
2. Armstrong-Keta, Inc. (PC20)
3. Douglas Island Pink and Chum (DIPAC) (PC141)
4. Kodiak Regional Aquaculture Association (PC266)
5. Northern Southeast Regional Aquaculture Association (NSRAA) (PC371)
6. Prince William Sound Aquaculture Corporation (PC401)
7. Southern Southeast Regional Aquaculture Association (SSRAA) (PC473)
8. Valdez Fisheries Development Association Inc (PC525)



██████████ PC443  
██████████ ite 201  
Juneau, AK 99801  
Phone ██████████  
www.seconference.org  
Email ██████████

SOUTHEAST ALASKA REGIONAL DEVELOPMENT ORGANIZATION

March 2, 2026

Alaska Board of Fisheries  
Art Nelson, Executive Director  
PO Box 115526 Juneau, AK 99811

**Re: Opposition for Proposal 170**

Dear Art Nelson and the Board of Fisheries:

This letter is to express opposition from Southeast Conference for Proposal 170 to be considered at the March 17-21, 2026 Alaska Board of Fisheries meeting, which would reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery supported ecosystem in Southeast.

Southeast Conference is the state and federally recognized regional Economic Development District for Southeast Alaska. Southeast Conference has 240 member organizations representing people and businesses from all 35 regional communities. Our mission is to support activities that promote "strong economies, sustainable communities, and a healthy environment in Southeast Alaska" in the region. The 2030 Southeast Comprehensive Economic Development Strategy (CEDS) identifies two priority objectives and six additional seafood and maritime initiatives that are supported by the region's hatchery programs. The region and membership have demonstrated strong support for hatcheries as an essential component to a healthy fish stock supporting the regional seafood economy.

The health of fisheries, including hatcheries, is critical to Southeast Alaska and the state. Alaska's salmon hatchery program is responsible for supporting approximately 4,200 jobs, \$219 million in labor income, and \$576 million in economic output annually benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon. In addition to negative ramifications for the commercial sector, a reduction in hatchery production would diminish the availability of salmon for subsistence, personal use, and sports fishing impacting food security, cultural practices, and recreational opportunities in Southeast Alaska and beyond. Southeast Conference recognizes the role Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play in generating economic stability, providing jobs, and supporting local communities through hatchery operations.

Proposal 170 would create uncertainty for hatchery programs, complicating long-term planning and financial commitments potentially jeopardizing the entire program. Current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts laid out in Proposal 170. Alaska's hatchery system follows stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups.



A strong hatchery program is critical to the seafood industry and the economic well-being of the communities in Southeast Alaska and across the state. Southeast Conference strongly opposes Proposal 170 scheduled for consideration at the March 17-21, 2026, Board of Fisheries meeting and urges the Board of Fisheries to reject this proposal to prevent detrimental economic and social impacts on Alaska's hatchery programs and the communities they support. The Southeast Conference calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

Sincerely,

A handwritten signature in blue ink that reads "Robert Venables". The signature is written in a cursive style with a large initial "R".

Robert Venables  
Executive Director  
Southeast Conference



Southern Southeast Regional Aquaculture Association, Inc.  
 [REDACTED], Ketchikan, Alaska 99901  
 www.ssraa.org

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March 2, 2026

Alaska Dept. of Fish and Game  
 Alaska Board of Fisheries  
 Submitted via online form

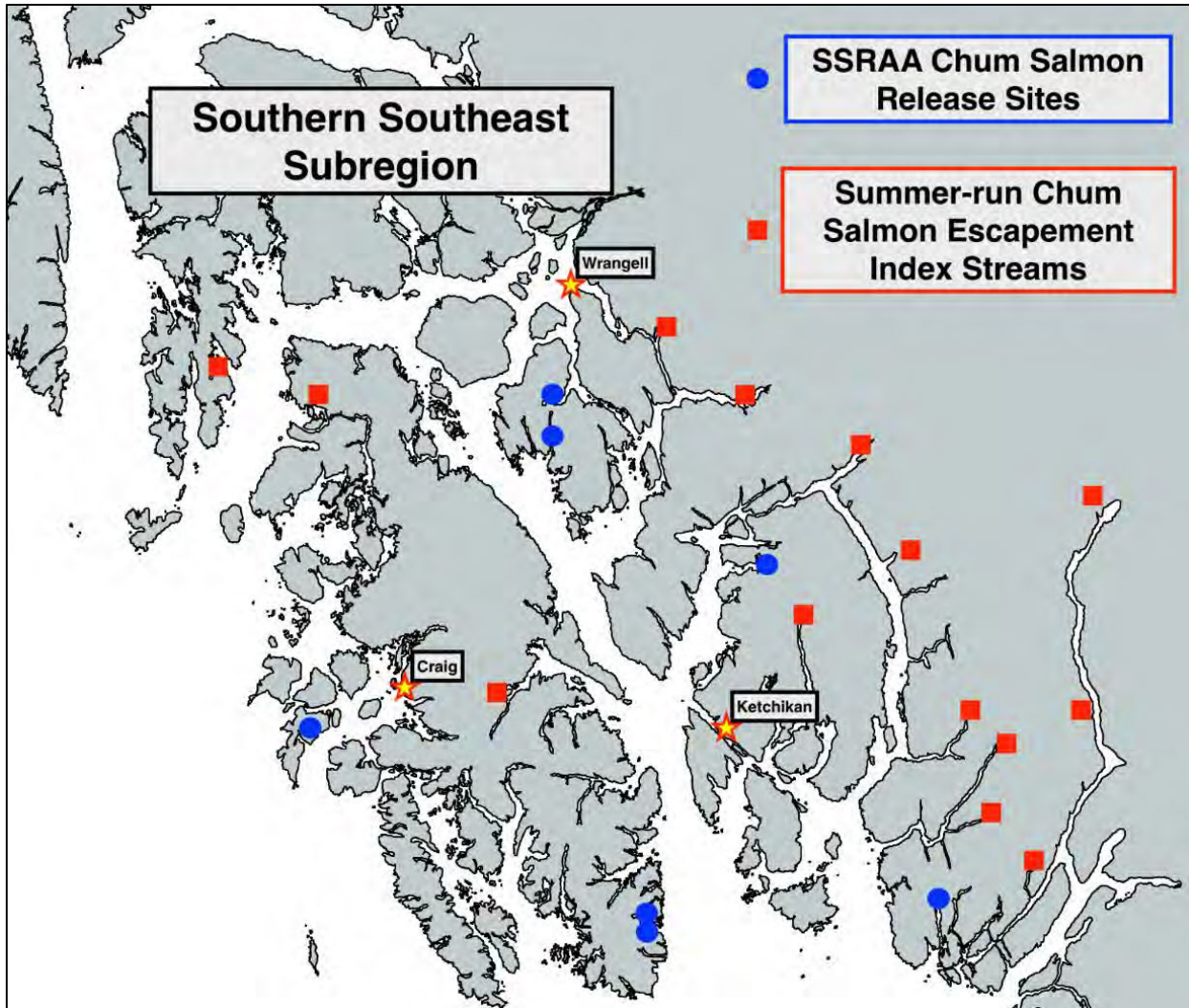
Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

**RE: Opposition to Proposals 170, 171, 172**

Thank you for the opportunity to comment on the proposals before you at the Statewide Finfish and Shellfish meeting in Anchorage. The Southern Southeast Regional Aquaculture Association (SSRAA) is a regional nonprofit salmon hatchery organization originally incorporated in 1976. SSRAA is governed by a 21-member Board of Directors representing a cross-section of regional salmon users, communities, and members of the public. Our mission is to *“enhance and rehabilitate salmon production in Southern Southeast Alaska to the optimum social and economic benefit of salmon users.”*

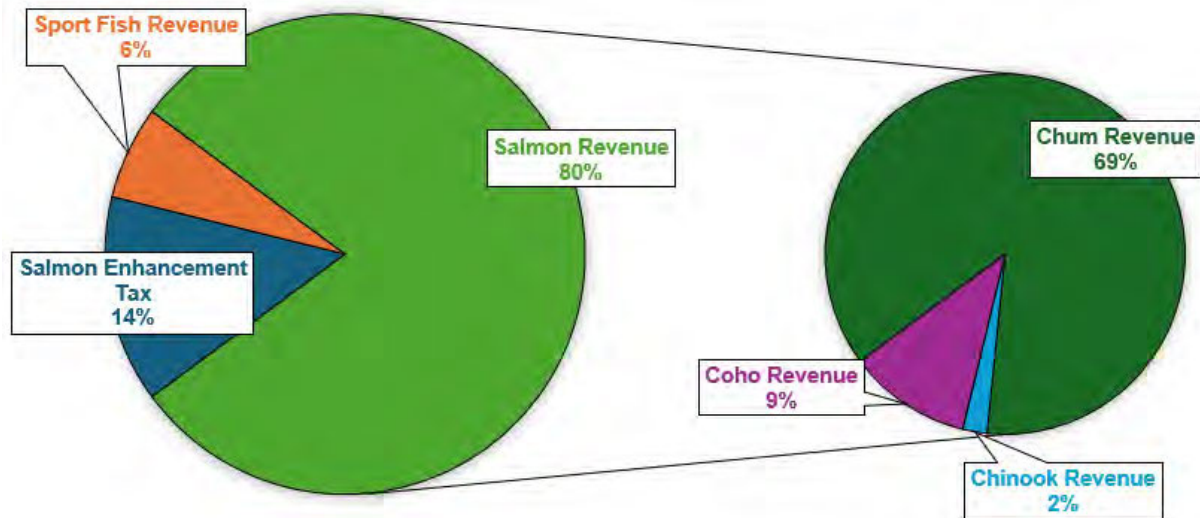
In 2019, an agreement was made between Alaska’s hatchery operators and the ADF&G Commissioner to keep permitted egg capacity for chum and pink salmon at their currently permitted levels. Since that agreement, **there have been no new release sites permitted, nor have any increases in chum or pink salmon permitted capacity been requested.**

SSRAA releases approximately 200 million chum salmon, 3 million Chinook salmon, and 9 million coho salmon annually across 12 release sites in southern Southeast (SSE) Alaska. SSRAA is currently at 86% of our permitted chum salmon capacity and **does not have the ability to release more salmon due to a lack of rearing space and water.** SSRAA currently releases chum salmon from six locations across SSE Alaska. These sites were deliberately selected to minimize potential interactions with wild salmon stocks and are situated well away from the region’s wild chum salmon escapement index streams monitored by ADF&G to assess wild stock abundance (Figure 1). SSRAA’s founding members strategically selected these sites to significantly contribute to the common property fishery while ensuring minimal impact on wild stocks. Notably, SSE Alaska summer-run chum salmon index streams have only missed the lower bound of their escapement range four times since 1990.



**Figure 1.** SSRAA chum salmon release sites and ADF&G summer-run chum salmon escapement index streams in the Southern Southeast Subregion.

In 2025, SSRAA-produced salmon contributed \$16.4 million to the commercial fishing sector in SSE, with 75% of that value derived from chum salmon. Additionally, approximately 30,000 Chinook and coho salmon were harvested by the sport fleet, providing significant economic, social, and cultural benefits to communities throughout the region. SSRAA's operations are funded through salmon revenue generated by cost recovery (80%), the salmon enhancement tax (14%), and the ADF&G Sport Fish Division (6%) (Figure 2). Of SSRAA's cost recovery revenue, 69% is derived from chum salmon, compared to 9% from coho and 2% from Chinook salmon. A 25% reduction in chum salmon permitted capacity would have cascading effects, reducing Chinook and coho production and diminishing opportunities for sport, subsistence, personal use, and commercial fisheries.



**Figure 2.** SSRAA Revenue Sources.

SSRAA's permitted production levels were designed to balance opportunity among the seine, gillnet, and troll fleets. Chinook and coho salmon releases represent the majority of SSRAA's contribution to the troll fleet, which remains below its allocation level. Because yearling production (Chinook and coho) is significantly more expensive than chum salmon production while generating substantially less cost recovery revenue, an arbitrary reduction in chum capacity would disproportionately harm the Southeast Alaska troll and sport fleets without providing measurable benefits to wild salmon. Moreover, implementing production cuts through this mechanism would undermine the established scientific and public review process conducted by the ADF&G Commissioner and Regional Planning Teams (RPTs).

In closing, **please vote in opposition to Proposals 170, 171, and 172.** Alaska hatcheries have operated for 50 years in close coordination with ADF&G, stakeholders, and the public through an open and transparent process. This year, SSRAA celebrates its 50th anniversary, an achievement that reflects decades of responsible management and collaboration. There is currently no sound scientific evidence demonstrating that reducing hatchery salmon production would produce positive effects on wild salmon stocks in Alaska. However, the economic, cultural, and social impacts of such reductions to the communities we serve would be immediate and substantial. Adoption of these proposals in any form would establish a precedent allowing hatchery production to be altered arbitrarily, outside of the full RPT scientific and public review process. The work you do and the time you dedicate to the Board of Fisheries are greatly appreciated. I am available to provide any additional information or clarification regarding these proposals.

Respectfully,

Tessa Fost  
General Manager SSRAA

**Submitted by:** Rita Spann

**Community of Residence:** Cordova

I'm an Area E Permit holder and am strongly in support of Proposal 162. Subsistence fishing should not be commercialized anywhere in the state.

I support Proposals 163, 164 and 165. If vessels are bottom trawling they need to be held accountable to bottom trawling management. Adopting these monitoring tools and regulations will make Alaskan fisheries management more accurate and sustainable.

I strongly oppose Proposals 170, 171 and 172. Alaskan hatchery programs are vital to sport, commercial and subsistence fisheries all over the state. Blunt cuts to production are not a sound management strategy and should not be implemented.

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**Proposal 175-Oppose****Introduction: Expert observations.**

Having personally overserved hundreds of king salmon caught and released by dipnets on the Copper and Kenai Rivers over the past 15 years of operating a dipnet charter on the Copper and Kenai Rivers and observing the public adjacent to us I have witnessed a conservation minded approach to release of non-retention kings by dipnetters. There are approximately 40,000 annual household dipnet permits pulled each season in Southcentral alone. Many of these households possess and fish multiple nets likely requiring in excess of 100,000 nets that would have to be restrung at \$35-50 per net.

**Safety Matters: Nets should be secured to the boat!**

Safety is paramount on the water while dipnetting for salmon in Subsistence, Personal Use and Commercial dipnet fisheries from a boat. Alaska's rivers are particularly unforgiving to those unfortunate souls who fall into our rivers. Many of these accidents result in fatalities annually.

Holding a dipnet by hand while power trolling in swift water on a boat is dangerous, to nearly impossible, without the net being secured to the boat. Without the net being secured, it puts the dipnetter over the gunnel of the boat in an awkward position, often in a way that shifts their center of gravity outboard increasing by orders of magnitude the likelihood of falling out of the boat and getting washed under the vessel and into the propeller or jet drives resulting in serious injury or death.

Having nets secured to boat helps reduce the likelihood of the fishermen getting pulled overboard when the net is fouled on a rock, or other debris. It keeps people inside the boat. The line effectively prolongs deceleration making the fouling less abrupt giving the fishermen time to either release the net or alternatively the line adds enough tensile strength to overcome the snag and pull it free. This prevents the loss of gear that can cost upwards of \$250-\$350 per net depending on configuration. The line secured to the pole and the boat effectively acts as a handrail to those fishing offering 3 points of contact increasing stability for all fishermen and especially our youth, elderly and disabled Alaskans.

**Gear Type: 4.5" Mesh good for commercial gill net king conservation but not for dipnets?**

Currently 4.5" mesh is the most common size of webbing that is commercially available in Alaska for dipnets. In discussions last week with LFS Donaldson's there are no commercially available webbing options outside what is currently available.

While fishing from a boat, the dipnet web tends to stay open (inflated like a balloon) while the net is in the water fishing. When a fish is suspected the net is pulled upwards, and it stays inflated all the way through the water column to the surface and only starts to collapse on itself when pulled out of the water and/or by the faster moving surface current. At that point, the fish is lifted into the boat to be harvested or if it is a non-retention species the net is manually flipped and the fish is released over the side of the boat. Often the non-retention species does not even come over the gunnel. The difference between catching a sockeye and king in the dipnet are instantly and abundantly clear when retrieving the net. Dipnetter and crew can easily prepare for release if applicable prior to the net reaching the surface.

**4.5" Mesh Facts:**

- 4.5" mesh tends to allow larger kings to be rolled out of the net more easily with bigger openings in the webbing their fins, teeth and nose are more easily cleared from larger non gilling mesh making expeditious release more likely.
- 4.5" mesh tends to foul the sockeye making it ideal for use by younger, older and disabled fishermen. Sockeye being the targeted species.
- 4.5" mesh is ideal in currents that make net retrieval difficult from the beach or boat as sockeye foul in this webbing more.
- 4.5" mesh seems to be the preferred mesh size when restricting commercial gear to conserve kings. A dipnet is a scalpel and non-targeted fish can be released with relative ease.

**Conclusion:**

All dipnet caught fish and notably Non-targeted fish such as King Salmon when applicable are quickly pulled up the water column from depths for 2'-15' feet of water by dipnets. In nearly all cases, the king is pulled up and released from the net in less than one to two minutes with only a 10-15 second effort to bring them up to the waters surface where we can begin to release the fish. Notably, occasional fouling does happen and would happen regardless of mesh size but the overall short handling time of these hardened fish and their immediate release is not supported by the proposer's casual observations of dipnet released mortality.

Conspicuously absent is any known effort by the proposer to provide public outreach to demonstrating best practices or less harmful release techniques to fish they are concerned about. Further the proposer insists on 100% retention of all kings caught in a fishwheel. Each fishwheel permit holder can retain as many as 500 kings per subsistence permit. 5 kings are allowed to be retained in both state and federal subsistence if harvested by boat. No conservation consideration is given on removing kings from a fishwheel live well in an effort to conserve, rather all efforts are consistently focused on restricting access and opportunity by boats in the Personal Use Dipnet fisheries in southcentral and statewide that feed Alaskan families.

Proposal 162-Oppose

**Introduction: The History**

In 2021 at the Cordova meeting for the PWS finfish meeting the BOF members made it clear that the board would not be restricting transport services to state subsistence users after taking action to ban charter access to residents in these state subsistence fisheries. In building the record the board stated by allowing transport services to remain, they were not restricting access to residents of Alaska who are all eligible to participate in state subsistence fisheries.

The users above and below the PU fishery on the Copper have taken a local issue and pushed it statewide banning charters in subsistence fisheries across the state. They continue to try and take additional bites at the apple to restrict access of residents to subsistence fisheries by submitting the same proposal cycle after cycle, in their local fishery, the Kenai and statewide meetings.

**No-biological Backing: Conservation is not the issue**

The restriction to state subsistence fisheries absent of a biological concern presents a clear attempt by proposer to reduce users of the resource. The Copper River has extremely limited public access to and proposers Native Corporation holds most uplands adjacent the river further underscoring the benefits of transport access to by both state and federal subsistence users in the area.

**Conclusion**

**The Board has unanimously declined to affirm this proposal at the 2021 & 2024 PWS FinFish Meeting, the 2023 Statewide FinFish meeting, and the 2024 Upper Cook Inlet meeting and I would expect the board to do it again this same this time around, ensuring subsistence access to residents of Alaska. Especially when no conservation concern exists.**

**Submitted by:** Laura Stats

**Community of Residence:** Juneau

Dear Board of Fish,

I am in favor of the proposals below for the pelagic trawl fish fleet.

Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.

Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.

Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

I am a Southeast Alaskan who has family and friends in the Southeast area fishing fleets. Through these contacts I have been aware for decades that both pelagic and bottom trawl fisheries need improved monitoring due to bycatch issues.

These proposals are long overdue, common sense and should have been enforced years ago. Unfortunately now we have climate warming issues that are greatly impacting salmon returns. Salmon have existed on the planet for millions of years. Will it be a sad fact that during our time they will dwindle to extinction?

Implement these changes asap.

Laura Stats

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Jack Stevenson, and I am a commercial fisherman based in Cordova, Alaska. I am also a subsistence fisherman, sport fisherman, and direct marketer. My gillnetter is the F/V Legend, and I am a third-generation fisherman.

If Proposals 170, 171, and 172 are adopted, it will significantly reduce my chance to make a decent living for my family, because we depend heavily on these salmon showing up every season. Salmon already have a low return rate due to many obstacles at each stage of life, whether low food availability, predation, or changes in ocean temperatures and conditions. Reducing hatchery production will give us even smaller returns than what we have been facing.

Cordova and outlying fishing towns rely heavily on residents having good seasons to afford putting money back into the local economy. If we fishermen can hardly afford to meet our basic needs, we will not be spending money at local businesses in these communities. There is a major ripple effect in smaller communities where a majority of residents rely on fishing as income.

Our hatcheries have given fishermen a great opportunity to provide great food to the world while making a decent living wage in an ever-changing world. With the rising cost of fishing equipment, fuel, food, and housing, we need every possible chance at healthy and plentiful salmon returns to stay competitive and sustain our livelihoods.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management

framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Jack Stevenson  
Cordova, Alaska





March 2, 2026  
 Alaska Board of Fisheries  
 PO Box 115526  
 Juneau, AK 99811-5526

## **RE: Oppose Proposal 186 – Upper Cook Inlet Drift Gillnet Restrictions**

Madam Chair and Members of the Board:

My name is Penelope Haas, I am a commercial fisherman in Cook Inlet and owner of Stickleback Fish Company, a sea-to-table business offering fresh, smoked, pickled, and cured salmon in Homer, Alaska. We are a young and growing business with Alaskan employees and we rely on good management of the EEZ fishery. I am writing to ask you for both near- and long-term improvements to the management of the Cook Inlet EEZ.

First and foremost, I want to underscore that thousands of people depend on this fishery for our livelihoods. Made up of many small businesses, Upper Cook Inlet commercial fishermen bring in important revenues to the State of Alaska and our local communities; our fishery goes back to the 1880s and has deep roots in towns up and down the Kenai Peninsula. Your decisions will impact people starting their families, building or buying homes, saving for their kids education, putting money away so they can retire.

**I oppose Proposal 186** and urge the Board to either **reject the proposal or decline to take action outside the regular cycle.**

### **Concerns**

The proposed restrictions would apply regardless of run strength, including in years of strong returns. This is not the way to manage salmon: we need to manage on the basis of inseason escapements, and use scientific benchmarks to guide department decisions. While it is true that Coho escapements in the Deshka and Little Sue have not been met recently, that is not the whole story. We ask the Board to weigh these other important factors:

- a. Other user groups are muddying the water: consider that in any given year, it is typical for sport harvest to be equal to the escapement in the Little Susitna, one of our two indicator streams.<sup>1</sup> Considering that this sport harvest data comes from voluntary harvest reports, rather than any kind of mandatory record keeping, it is safe to say that real sport harvest is quite a bit higher

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<sup>1</sup> Fishery Manuscript No. 24-01 Review of Salmon Escapement Goals in Upper Cook Inlet, Alaska, 2023 by Timothy R. McKinley, Jack W. Erickson, Tony Eskelin, Nick DeCovich and Hamachan Hamazaki. January 2024, p. 59.



than estimated.<sup>2</sup> Even if you shut the commercial fleet down completely, this would still be a substantial obstacle to meeting escapement goals in the indicator streams.

- b. Reported sport harvest in the Cook Inlet is significant, and is at parity with Commercial Coho Harvest: in 2024 reported harvest was 72,582, in 2023 reported harvest was 86,578, 2022 reported harvest was 120,698. Closing off an entire area for the commercial fleet while placing no restrictions on Sport Harvest would be discriminatory and irrational. If you are concerned about Coho abundance in Cook Inlet, you would place restrictions on all user groups.
- c. Data collected on coho escapement are not accurate, they are undercounts, as the Alaska Department of Fish and Game themselves recently stated:

“Both the Dëshka and Little Susitna River coho salmon weirs have experienced flooding or early ending of the project due to funding. Because of that, those counts are considered minimum or incomplete estimate of coho salmon inriver abundance. Dëshka River coho salmon weir counts have been incomplete each year since 2020. Little Susitna River coho salmon weir counts have been incomplete each year since 2022. Fall weather and high water make consistent operation of these weirs difficult.”<sup>3</sup>

## Administrative Procedure

Proposal 186 does not meet the standard for consideration as an out-of-cycle Agenda Change Request (ACR), as outlined by the Department of Fish and Game itself (see above). Under Alaska law ACRs are reserved for unforeseen or imminent conservation or biological issues that arise outside the regular cycle and require immediate Board action.

Proposal 186 identifies no such circumstance, and no immediate risk exists that current management tools are unable to address. The proposal gives itself away by seek *permanent* regulatory changes to what they claim to be an immediate and unforeseen issue. Coho are notorious for high variability of returns and it is not appropriate to shut down an entire fishing area forever because of several years of poor returns (when the data on all those years has been bad).

<sup>2</sup> <https://www.adfg.alaska.gov/sf/sportfishingsurvey/>

<sup>3</sup> ALASKA DEPARTMENT OF FISH AND GAME STAFF COMMENTS ON AGENDA CHANGE REQUESTS ALASKA BOARD OF FISHERIES WORK SESSION ANCHORAGE, ALASKA October 28–29, 2025, p. 7. Online at: <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/ws/adfg-staff-comments.pdf>



**Request**

I respectfully ask you to **reject Proposal 186**, or in the alternative, decline to take action outside the regular cycle and postpone consideration until the regularly scheduled Upper Cook Inlet meeting in March 2027.

Sincerely,

Penelope Haas

Captain, F/V Kustatan  
Owner, Stickleback Fish Company  
*Beautiful Wild Cook Inlet Salmon*





**Submitted by:** Frede Stier

**Community of Residence:** Palmer, Alaska

I'm writing to support Proposal 186, because the streams in the Mat-Su Valley are the locations where I could catch salmon in the past, before instream salmon shortages, restrictions, and closures started occurring during the last three years. I believe the commercial drift gillnet fishery -- which has been harvesting an increasing number of coho salmon needs to be managed in more conservative manner in order to allow more coho to make it to Mat-Su stream drainages like the Deshka and Little Susitna River. These are two locations where I and many other folks in the Mat-Su Valley have relied on for years to harvest fish for the year. Thank you for considering Proposal 186 and conservation amendments to the Central District Drift Gillnet fishery Management Plan as a way to help maintain sufficient coho salmon returns to meet escapement needs.

**Submitted by:** Ivan Stonorov

**Community of Residence:** Homer

To the Alaska Board of Fisheries,

I oppose the Commercial Finfish Proposals 170, 171 and 172.

Don't mess around with what works. 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.

There is concern about straying of hatchery fish and their fitness. All salmon species have a small percentage of individuals that stray, that is how they survive natural events like large floods and freezes. When there are huge returns, there is going to be more straying of both hatchery and wild stocks.

Studies show that second generation fish have greatly improved reproductive success whether they are pink or chinook Salmon. This is illustrated by a conclusion from the ADFG hatchery research project "Second-generation offspring of hatchery strays show reduced fitness, but the decline is much less severe than in the first generation, particularly in the odd lineage. Relative Reproductive Success F0 ' F1 F1 ' F2 Even lineage 0.481 0.727 Odd lineage 0.279 0.848." (spawning success even year 48.1% first generation 77.7% second generation odd year 28% first generation 84.8% second generation.) "Another quote from an article in Science Daily shows similar findings. They write, "we found that the first-generation descendants of hatchery-origin Chinook salmon produced more offspring than hatchery-origin salmon spawning alongside them in the river, meaning that reproductive success may improve in the wild as quickly as it declines in the hatchery." These results were recently published in the journal Evolutionary Applications. The paper's lead author is David Dayan, who was a faculty research assistant in O'Malley's lab and now works for the U.S. Fish and Wildlife Service.

Proposal 171 gets its numbers from a study done by the ADFG in Pink Salmon Hatchery Proportions in selected Lower Cook Inlet Commercial Fisheries from 2015–2018 by Ted Otis and Glenn Hollowell. This proposal seems to be manipulating numbers, 22% straying from PWS is not quite correct. I think that 22% represents the percentage of otolith marked fish that were sampled with PWS markings. Also many of these samples were taken during the blob/warm years when the salmon did not behave normally. It appears that some years there was very little straying and other years there was more. Looking at the places that were sampled where there are normally robust runs of pinks, these streams had very little straying. Humpy Creek for instance had .08 percent straying. Less robust systems in areas that act as natural fish traps on the outer coast and streams like Fritz Creek that have very little return because most of the fish spawn in the intertidal area and freeze also had high percentage of hatchery fish most likely because there were limited numbers of wild fish in these extremely small streams. The conclusion of this study states that the "current data set is limited given a

small number of years sampled.” Further there is a need to “continue sampling based on a comprehensive study design.”

The Prince William Sound hatcheries have seen the return of more than 35 generations of salmon to the region with continuing robust returns. These returns have secured the livelihood of the fisherman involved in the harvest in PWS, and has provided food security on a national level. Any disruptions to the hatcherie’s production of salmon would have severe consequences to the Alaskan economy, and national food security. Please look at the science and realize that we are living in a changing climate. Not all salmon species are going to fare well in the ocean or in streams that are much warmer than normal.

Sincerely,

Ivan Stonorov

Lifelong Alaskan, commercial and sport fisherman, and current PWS Seiner

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Jordan Stover, and I am a commercial fisherman in Prince William Sound based in the Kenai and PWS region.

The hatcheries I commercially fish are already facing more pressure from sport and charter users, and these proposals would mean less fish for everyone. These changes could shut down commercial fishing businesses — not charters or sport operations, but the commercial fleets that pay for the hatcheries and help feed others.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Jordan Stover  
Kenai/ PWS, Alaska

[REDACTED]

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Street. I am a former president of the Southern Southeast Regional Aquaculture Association (SSRAA), a former member of the Southeast Alaska Regional Planning Team, and a Southeast Alaska seine fisherman.

Southeast Alaska hatchery production is vital for the economic and social success of both the sport and commercial fisheries. There is no science-based rationale for supporting these proposals.

The economic impacts to Southeast Alaska communities would be significant, including elimination of many sport fishing opportunities and great harm to the economics of the troll, gillnet, and seine fisheries, as well as the processing sector. Management must be based on solid science, not falsehoods and scapegoating.

Making major changes to hatchery programs based on falsehoods and grievance results in poor policy that will produce economic wreckage. We need to adhere to science-based policy.

In Southeast Alaska there is always great variability in the survival of natural salmon returns. Hatcheries have contributed to a more stable fishing industry and stronger communities.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

David Street  
SE AK, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Sven Stroosma, and I am a commercial fisherman in Southeast Alaska. I operate the F/V Voyager.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals are adopted, they would negatively impact my family's livelihood and the viability of my business. They would reduce harvest opportunities and processing jobs and diminish economic stability in Southeast Alaska.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Sven Stroosma  
Southeast Alaska



Alaska Board of Fisheries  
 March 17, 2026  
 Anchorage

Comments  
 John Sund



Craig, Alaska

**COMMENTS ON BOARD PROPOSALS: 170, 171, 172.**

RE: Board Authority: AS 16.10.440(b)

**INTRODUCTION**

I direct my comments to the discussion on Board Proposals: 170, 171, 172, regarding the authority of the Board of Fisheries as stated in AS 16.10.440.

**RECOMMENDATION**

I strongly recommend the Board not attempt to use the reference to source and number of salmon eggs in AS 16.10.440(b) as a vehicle to amend permits issued by the Commissioner under the nonprofit hatchery statutes.

**REVIEW OF STATUTE**

The Board has wrestled with the authority of the Board regarding the private non-profit hatchery program for many years. The Department of Law has written memorandums to the Board regarding the question of Board authority over the past 20 – 30 years. I can bring a historical perspective and background surrounding the drafting of the section and provide a historical context to assist in the review and discussion.

In 1976. AS 16.10.440 read

- (a) Fish released into the natural waters of the state by a hatchery operator under secs. 400-470 of this chapter are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.
- (b) The board may promulgate regulations necessary to implement secs. 400-470 of this chapter.

This section created a layer of confusion in terms of how the nonprofit hatcheries were going to operate. The statute vests detailed authority in the Commissioner to implement and manage the creation, operation and permitting of nonprofit hatcheries. How were the nonprofit hatcheries to get permits if the Board of Fisheries is required to promulgate regulations to implement the same sections as delegated to the Commissioner?

The legislature decided to place the implementation of the nonprofit hatcheries and permitting and comprehensive planning with the Commissioner. And leave the allocation of the fish in the common property water to the Board of Fisheries.

In 1979, AS 16.10.440 was amended to read:

(a) Fish released into the natural waters of the state by a hatchery operated under AS 16.10.400 – 16.10.470 are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.

(b) The Board of Fisheries may, after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest. The Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400-16.10.470.

**The last sentence in subsection (b) was included as a definitive statement that the Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400 – 16.10.470. When this section is read in the context of the of the statutes dealing with non- profit hatcheries it is clear the legislature put the Commissioner in charge of the non- profit hatcheries. And the Board of Fisheries with the authority to regulate the harvest of salmon in the common property.**

It is difficult to envision what and how a Board regulation would look like in terms of amending a permit? What criteria would be used? How would the impacts be measured? How would it affect the financial structure of the company? All these issues are considered by the Commissioner when granting the permit. There is a process through the Regional Planning Team, public hearings and staff recommendations to arrive at the decision.

There is a robust and comprehensive process set out in the statutes providing for public comment and input into the decision-making structure for managing nonprofit hatcheries. If there is a problem or issue that arises after a permit is issued the Commissioner can make a finding the hatchery is not in the best interest of the public and alter the conditions of the permit under AS 16.10.430. There are examples of the Commissioner using the power granted in the statutes to deal with breaches of permits. The Commissioner closed the Meyers Chuck hatchery due to noncompliance. And, revoked the permits for Alaska Aquaculture due to default on debt. There are ways and means built into the existing statutes to deal with many of the issues of concern.

## **HISTORICAL BACKGROUND**

I worked on drafting the legislation and regulations as an attorney for Southern Southeast Regional Aquaculture Association (SSRAA) and staff to the legislature in 1977 and 1979-80.

**This amendment is confusing and is causing a great deal of angst among the Board and hatchery operators. What does it mean? The legislature could have just adopted the last sentence and said the Board of Fisheries may not adopt any regulations or take any action. But the legislation includes three carve-outs of authority for the Board. Two of the provisions make sense in terms of the Board authority to deal with allocation of fish in the**



**common property. The harvest of fish by hatchery operators and the specific locations. The third provision relating to the source and number of eggs is creating confusion in terms of the management, long term planning and operation of non- profit hatcheries.**

The legislation setting up a comprehensive framework for the creation and management of private non-profit hatchery was adopted over a few years. It was a new endeavor and as the implementation took place various unknown factors arose, and the legislature passed new and clarifying statutes to address the issues. The primary legislation was adopted in 1974, 1976, 1977, 1978 and 1979 and there were a few additional changes in later years.

It was new territory to balance the oversight of the creation of hatcheries operated by private non-profit entities. The use of common property resources and public resources to build hatcheries that produce salmon for harvest in the commercial, sport and personal use fisheries. The challenges included a balance between public input and consideration of use of public assets, the private financing through assessments on commercial fishermen and loans from the state and the need for stability in the planning, production and financing.

There was also a need to proceed with expediency to get the process going and keep it going. This had never been done before. It was a new social experiment in a public – private partnership. There were no models in the world to follow. It was new ground for everybody.

The initial legislation in 1974 creating private non-profit hatchery was one or two sentences. From there the idea started and different areas of the state began to explore options. The challenges from how to finance to site selection, brood stock egg takes, organization of managing entities needed solutions.

Voluntary assessments in Prince William Sound worked for one year but proved to be unreliable. It was a new program and concept. Mandatory assessments to be collected by processors and sent directly to associations were found unlawful in the Wayne Alex case. Legislation was amended to recognize the assessments as a tax payable to the state and deposited in the general fund. The enhancement loan fund needed clarification regarding the accrual of interest on outstanding balances.

Many of these issues came to a head in 1977 – 1978. The 1978 legislature appropriated \$100,000 to set up the Aquaculture Policy Study Group. The Letter of Intent for FCC for SCS for CSHB 920 opening paragraph:

“The Aquaculture Study proposes to clarify statutes authorizing private nonprofit salmon hatcheries so that management authorities such as the Department of Fish and Game and the Board of Fisheries can better understand and implement the intent of the Legislature.”

The Aquaculture Study Group was organized in July and met in September and later in the fall 1978.

Six major areas of concern were chosen to be addressed by the study group:

1. Clearly define the State’s policies on Aquaculture – examine existing statutes/resolutions/policies
2. Stock Management

3. Define roles of organization and groups
4. Land Use problems
5. Cost/Benefit analysis of private and state projects
6. Research Base

**There were a lot of areas of confusion and overlapping jurisdiction and policy and procedures to work through. The ideas, recommendations and concepts from this study led to many of the provisions adopted in the 1979 legislation. Including the change to AS 16.10.440.**

The section is related to the need to harvest the initial brood stock from wild salmon spawning streams. At the time (1978-79), there was a lot of discussion of how and where to source the initial brood stock and how that may impact the production of wild salmon streams. The selection of the streams for hatchery brood stock involved discussion at the Regional Planning Team, between regional hatchery managers and the Department and the US Forest Service. Access to many streams involved crossing Forest Service land. Setting up temporary camps on streams. Building weirs in the streams to trap salmon. Deciding how many salmon to harvest for hatchery brood stock. Impact of the brood stock taking on the overall production of that stream. It was complicated. And getting it right was important.

**It provided a means for the Board of Fisheries to act upon a permit granted by the Commissioner for the egg take from wild salmon stocks in specific stream. The Board of Fisheries never reviewed or questioned any of the Commissioner decisions on collection of the initial brood stock for hatchery from wild salmon streams either in the state owned and operated hatcheries or the private non-profit hatcheries.**

**This section (b) was intended for the Board to have an opportunity to look at the gathering of hatchery brood stock from wild salmon streams. The other sections in .440(b) relate to the Board authority for harvest of salmon in the common property including harvest by hatchery operators. The provision dealing with amending permits for source and number of eggs does not fit with the scope of the overall statutory design to place authority for oversight of non-profit hatchery with the Commissioner and allocation of salmon in the common property with the Board of Fisheries.**

**It was not intended to be a vehicle for the Board to step in at any time on a permit-by-permit basis to amend or revoke permits issued regarding sources and number of salmon eggs taken from stocks returning to the hatcheries or transferred between hatcheries. If that were the case the entire statutory framework for management and operation of non-profit hatcheries is upended. The planning, operations, financing, and site selection is placed in limbo. And subject to intervention by the Board of Fisheries on an ongoing basis. Either through emergency action or through the regular Board cycle. The unknown factor looms very large in every decision. This is what the original planners and drafters of the non-profit hatchery program were trying to avoid.**

END

**Submitted by:** Dan Suprak

**Community of Residence:** Wasilla

I live in and guide fishing in the Mat-su valley. I support proposal 186. I have seen the decline in fish within the upper Cook Inlet in rivers such as Deshka and The Little. Susitna. These rivers numbers of fish are declining so bad that ADFG has had to shut them down not. only for King salmon but now Coho. If we do not do something here in the near future these rivers will become decimated. This will not only hurt the people who rely on this rivers for fish but the local economy. The Deshka River was once one of the best fishing rivers in the state and sadly it no longer is. Please consider proposal 186.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ray Sutton, and I am a Prince William Sound salmon seiner based in Valdez, Alaska. I fish aboard the F/V Cape Trinity, and I am a third-generation commercial fisherman. I have worked in this fishery for 35 years, and I would love to see my children become fourth-generation fishermen.

Pink salmon are our main source of income, and in most years over half of the salmon I catch are of hatchery origin. If hatchery production is significantly reduced, it will have a significant impact on the local economy. The commercial fishing vessels, fish processors, and hatchery are large employers in this community. If reductions affect silver salmon production, that will also impact the largest swell of tourism in Valdez, including sport charters, campgrounds, local restaurants, hotels, and shops.

These proposals would ruin our family fishing business and make it unsustainable to pass on to my children. It appears that certain groups are looking for a villain to point at without scientific evidence. The hatchery was producing salmon for many years without a correlated impact on wild stocks. Hatcheries are not new. Wild stock declines should be studied, but in my view this is not due to hatcheries.

When it comes to pink salmon, we will probably never be paid a premium price. With the help of hatcheries, though, we are able to produce a low-cost protein and still operate a profitable family business. Making non-scientific guesses about the fishing industry could end our family's commercial fishing legacy. Scientific research can be done without experimenting by tanking the economies of numerous small Alaskan communities and small local businesses around the state.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ray Sutton  
Valdez, Alaska



**Submitted by:** Robert Swanson

**Community of Residence:** Petersburg

Proposals 170 , 171, 172

I oppose all. I need hatchery fish to make a living for my crew and myself

---

**Submitted by:** Steven Swartzbart

**Community of Residence:** Cordova

Steven Swartzbart

██████████ Cordova, AK 99574

I grew up in Cordova and have been commercial fishing my whole life. I am a second generation fisherman and took over my fathers PWS drift gillnet operation 10 years ago. I appreciate the opportunity to speak in opposition of proposals that will be devastating to my livelihood and community.

Support 164

This will give more accountability to the pelagic trawl fleet and monitor trawl nets contacting the bottom of the ocean. This will also help demystify the trawl fisheries and hopefully improve fishing practices.

Support 165

Salmon bycatch is a problem in trawl fisheries and this is a step to mitigate the issue.

Support 169-Amendments

Amendments should be made so state and federal have the same pot requirements.

Oppose 170

Oppose 171

Oppose 172

There will be little to no benefits to reducing the egg take in PWS hatcheries. It will also be near impossible to measure if there are any changes. Alaska hatchery pink only make up 2.1 percent of the total adult and immature biomass in the North Pacific, and an egg take reduction will only hurt costal communities.

PWS hatcheries had salmon first return in 1978. Hatchery salmon have been returning and straying for about 47 years. The 50 year long experiment has been successful in strengthening fisheries with hatchery fish alongside abundant wild returns in Prince William Sound.

King Salmon are declining across the state. It is devastating to the subsistence communities who have relied on these fish for longer than I can comprehend. Commercial salmon fisherman have seen huge reductions in time and area, literally changing the nature of the fisheries.

Climate change is a top contributor to why king salmon are struggling and the changing climate is the biggest threat to Alaska subsistence, commercial, and sport users. The warming ocean and river temperatures reduce oxygen in the spawning beds, increase parasite loads, increase metabolic rates, and limit or change food sources. This is very concerning and the best way to bring back King Salmon across the state is addressing climate change and not a reduction of salmon from hatcheries. I encourage the board and the public to put their energy towards management frameworks that adapt to climate change and not baseless cuts to important hatchery programs.

If 170-172 pass, or a version of these proposals, there will be negative consequences for every user group. Cutting egg take of pink and chum will lower the number of fish available for cost recovery and lower common property harvest. This would subsequently lead to possible cuts on non revenue generating programs like kings and silvers that are targeted by sport users. These proposals will hurt sport fisherman. Hatchery fish are used for subsistence in Prince William Sound. Cutting pinks and chums will negatively impact the hatchery system as a whole and could lead to elimination of sockeye programs that subsistence users rely on.

Support 174

Support 175

Support 180

Oppose 187

Rivers are always changing and especially in this region with so many glaciers, strong currents, and sand bars. Fish and Game has the power to change how the fishery is conducted with closures and stat areas to address the shifting rivers. There is no conservation concern here and is not a fully utilized fishery. This is the last place that needs a closure from the board of fish.

#### References

Lizabeth Bowen, Vanessa R von Biela, Stephen D McCormick, Amy M Regish, Shannon C Waters, Blythe Durbin-Johnson, Monica Britton, Matthew L Settles, Daniel S Donnelly, Sarah M Laske, Michael P Carey, Randy J Brown, Christian E Zimmerman, Transcriptomic response to elevated water temperatures in adult migrating Yukon River Chinook salmon (*Oncorhynchus tshawytscha*), Conservation Physiology, Volume 8, Issue 1, 2020, coaa084, <https://doi.org/10.1093/conphys/coaa084>

Update on Alaska Hatchery Salmon Production,

Research and Management (2024)

for a Marine Stewardship Council Audit of Alaska Salmon, January 6-10, 2025. Prepared by Granite Bay Biological, on Behalf of the Alaska Fisheries Development Foundation

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**PC460**

**Submitted by:** Phillip Tafs

**Community of Residence:** Anchorage

I am writing to OPPOSE proposal 175, specifically the ban on tying the net to the boat. This proposal would functionally close dipping from a boat. It would limit access to a public resource and diminish my ability to fill my freezer and feed my family. I strongly OPPOSE proposal 175.

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**PC461**

**Submitted by:** Zach Tanner

**Community of Residence:** Girdwood

It's crazy that trawlers are allowed to operate anywhere! I support a total ban on trawlers in Alaskan waters. Do the right thing and end this madness. Give the marine life a chance to comeback , total ban for 5 years and watch what happens.

The bycatch alone should spin your freaking head off , and the absurdity that private citizens can't even put one toe out of line for fear of heavy fines and penalties.

Trawlers pull up whales, sharks, seals, sea lions, every possible fish , crabs, starfish..... What else do you need to see before we can finally put an end this?

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**Submitted by:** Mark and Lucy Teitzel

**Community of Residence:** Anchorage

We support Proposal 186 in order to increase the number of Coho salmon reaching the Susitna River Drainages.

We enjoy sportfishing for Coho Salmon in the Susitna drainage.

We cringe when there is an over abundance of sockeye salmon in the Kenai and Kasilof Rivers because it means that we will face sportfishing restrictions on coho salmon in the Susitna Rivers and drainages ranging from no bait, only one fish and finally no sportfishing while 1000's of coho's are harvested by nets supposedly targeting sockeye before they even reach the river.

And even worse is that according to ADFG, not enough coho's are reaching the spawning beds to sustain future runs.

It appears that commercials may actually be targeting cohos instead of sockeye with cohos being a higher value fish which will only get worse as the number of cohos continue to decline.

This is ridiculous when ADFG allows more openings for the goal of reducing the number of sockeye into the Kenai or Kasilof Rivers and needs to be stopped for the sake of having future coho runs into the Susitna River.

Please support Proposal 186.

Thank you.

Mark and Lucy Teitzel

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### ***Territorial Sportsmen, Inc. – Opposition Comments on Proposal 170***

Territorial Sportsmen, Inc. respectfully submits this opposition to Proposal 170. This proposal would impose an arbitrary 25 percent statewide reduction in hatchery pink and chum salmon egg takes without any supporting biological data, stock-specific analysis, or demonstrated conservation benefit to wild stocks anywhere in the state. Mandating a fixed percentage reduction without evidence of need — let alone regional relevance — would be unsupported by science.

#### **Hatchery production needs regional assessment — not a statewide mandate.**

Alaska's salmon management is inherently regional. Hatchery programs throughout the state are designed, permitted, and monitored based on the unique life history traits, migratory behavior, stock composition, and user needs of each area. What may be a concern in one river system is not inherently a concern in another. Proposal 170 wrongly assumes that a broad production cut will benefit all regions equally — or that every region is contributing to the same management issues. That assumption is unsubstantiated.

In fact, the Board of Fisheries recently rejected a similar 25 percent reduction proposal for Southeast Alaska (Proposal 156) at its early 2025 meeting, recognizing that such a reduction lacked sufficient scientific support and would negatively impact fisheries and communities that rely on enhancement production without proven conservation benefit. The failure of Proposal 156 demonstrates that the Board has already considered — and declined — these arguments in this region less than a year ago.

#### **Proposal 170 would harm northern inside waters of Southeast Alaska.**

Speaking specifically on behalf of Territorial Sportsmen, Inc. and our members who fish, guide, and operate in northern inside waters of Southeast Alaska (NSEA), the impacts of this proposal would be real and adverse. Chum salmon enhancement programs in NSEA have been intentionally designed to minimize interaction with wild stocks. These programs have operated successfully for decades — providing commercial, recreational, and subsistence opportunities — under a framework of permitting, monitoring, and adaptive management by the Alaska Department of Fish and Game.

A blanket 25 percent reduction in egg takes supporting these enhancement projects would weaken productive fisheries that have no demonstrated negative impact on Yukon or other wild salmon stocks. We see no evidence that enhancement practices in NSEA are causing measurable decline in any wild stock elsewhere.

#### **A broad, data-free reduction is unjustified and premature.**

If there are scientific concerns about hatchery interactions with wild stocks in specific regions, those concerns should be addressed through regional wild stock assessment,

peer-reviewed data, and targeted management actions. A punitive, disproportionate statewide cut — untethered to measured effects — is not good fishery management.

**Territorial Sportsmen, Inc. urges the Board to oppose Proposal 170 on the basis that it:**

1. Imposes an arbitrary 25 percent cut without scientific evidence or demonstrated need;
2. Ignores regional differences in hatchery design, stock interactions, and fishery purposes;
3. Would harm established enhancement programs in NSEA that are responsibly managed and beneficial to local users; and
4. Repeats many of the same flaws rejected by the Board in Proposal 156 less than a year ago.

We encourage the Board to support evidence-based, regionally tailored assessments and solutions rather than broad, untested mandates that produce real harm without proven benefit.

**Submitted by:** Christopher Thomas

**Community of Residence:** Anchorage

OPPOSE 170, 171, 172

Comments are on Behalf of Chris, Germaine, Teslin and Sarana Thomas. An entire family, born and raised in Alaska. We subsistence fish, sportfish, and commercial fish.

We support science-based hatchery management and thoughtful adaptation — not blunt, sweeping cuts. Hatchery reform requires careful, data-driven adjustments, not across-the-board reductions. In Prince William Sound, hatcheries function as integrated systems. Chum and pink salmon fund research, monitoring, recovery work, sport and subsistence access, infrastructure, and decades of data collection. Cutting production without a clear strategy destabilizes the entire system for all species and all users.

Managers address issues like straying with precision tools — improved imprinting, release timing, and facility-specific changes — not speculative egg-take reductions. Ocean interaction questions are studied through targeted research such as food-web analysis, juvenile tracking, and coordinated North Pacific work. There's no clear evidence that reducing Alaska hatchery production would alter ocean dynamics, but drastic cuts would weaken Alaska's research and adaptive management capacity.

Hatcheries sustain commercial, sport, subsistence, and personal-use fisheries that coastal communities rely on. In Prince William Sound and across the Gulf of Alaska, they provide access and stability that would not otherwise exist. They are also vital recovery tools, especially for climate-sensitive Chinook, supporting rebuilding through monitoring, supplementation, and research in partnership with local and Alaska Native communities. Hatcheries are regional by design, shaped by local watersheds and priorities — and strong science works best with regional leadership.

Hatcheries are essential coastal infrastructure. They support food security, jobs, processing capacity, harbor activity, and working waterfronts. Fishing communities already face climate shifts, rising costs, and market uncertainty. Sudden statewide cuts would ripple outward — reducing jobs, incomes, and local revenues — and discourage long-term investment. Hatcheries help Alaska's fishing economy adapt; sweeping proposals risk destabilizing coastal communities without clear benefits to distant salmon populations.

Alaska maintains one of the world's strongest hatchery oversight systems, with permits, monitoring, genetics review, and adaptive management through the Alaska Department of Fish and Game. While the Board of Fisheries can amend specific permits, statewide mandates that bypass the established science-based process undermine transparency, regional evaluation, and public trust.

Hatcheries support wild stocks by stabilizing fisheries, shifting pressure from sensitive runs, and improving scientific understanding of salmon survival. Decades of hatchery production have occurred alongside strong wild runs, and many continue to thrive today.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nyle Thomas, and I am a commercial fisherman based in Petersburg, Alaska. I operate the F/V Barbara under N Thomas Fisheries.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Hatchery-produced salmon is a large part of my business model. The reduction of fish will make it harder to meet a bottom line for many businesses.

This would affect many coastal towns that have a commercial salmon fleet, directly affecting the fishermen but also the towns that process the fish and receive a raw fish tax into the communities. A crash in salmon production means deferred maintenance on boats and processors, people moving and leaving coastal towns, and losing a global market by not filling orders — forcing the markets to look for farmed or other fish to fill the void.

Many factors can cause the decline in salmon. It could be pollution from cruise ships, trawling, or over-escaping a stream.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Hailey Thompson Ivanoff. My husband and I own and operate a commercial salmon seiner fishing out of Kodiak, Alaska. I am also a Sun'aq Tribal member and grew up fishing with my father before marrying into a fishing family.

In 2025 alone, more than fifty percent of our catch came from the Duck Bay hatchery run. A reduction in hatchery production would significantly impact our fishing opportunities and make future seasons far more uncertain.

In Kodiak, fishing drives much of the regional economy. When harvest levels decline, processors reduce operations, retailers see fewer bulk purchases, fuel docks sell less fuel, and marine trades experience reduced demand. Reduced opportunity does not only affect fishermen—it creates ripple effects across nearly every business and family in the community.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Hailey Thompson Ivanoff  
Kodiak, Alaska

[REDACTED]

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Ron Thomson, and I am a commercial fisherman and gillnetter based in Cordova, Alaska. I fish aboard the Strait Shot.

The Prince William Sound Aquaculture Corporation chum salmon returns at Esther Island and the Montague remote release comprise a large part of my livelihood. A 25% reduction in production would result in very little ability for the commercial fleet to continue to make a living in this fishery. The hatchery has fixed expenses, so by reducing production, the main user group affected will be the commercial fleet. There are times where the surplus after cost recovery and brood stock is only 30% of the run. In years like this, the fleet would essentially not be able to fish.

The support businesses in Cordova are struggling as it is, and any reduced income by the fleet will likely put more processors and support businesses under. Many businesses, from fishermen to processors to retail supply houses, would greatly suffer or go out of business with this proposal.

At 62, I am approaching retirement. With continued poor fishing seasons, my boat and permit will have little value when it is time to sell. This will also curtail new entrants into the fishery. Many of these operations are family-based, and some families may choose to quit a multi-generational way of life and move away from the community if they can no longer make a living.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Ron Thomson  
Cordova, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Arthur Thurn, and I am a Southeast Alaska gillnetter with 46 years in the fishery. I fish aboard the F/V Skibo, and I live in Bellingham, Washington.

For 46 years, I have contributed 3 percent of my salmon earnings for hatchery production. Hatcheries give us fish to catch when wild stocks are weak, and they also give processors enough steady production to keep their workers busy. Worldwide production of salmon has driven prices way down, and we need hatcheries to stay in business. Hatcheries also help the charter fleet catch fish before coho show up. These proposals are a bad idea.

My friends who fish and live in Southeast Alaska could be driven into bankruptcy. Bankruptcy for processors and fishermen will occur if these proposals move forward.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Arthur Thurn  
Bellingham, Washington  
[REDACTED]



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is David Thynes, and I am a lifelong commercial salmon fisherman based in Petersburg, Alaska. I operate the Fishing Vessel Nocona. I live in a community that directly depends on the commercial fishing industry and healthy Alaska salmon hatchery programs for community tax funding, employment, and the many peripheral industries that help support the commercial fishing industry in Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These three proposals would affect me directly by drastically reducing my commercial fishing viability due to limited hatchery production. These proposals are hip-shot attempts at an issue that is far more complex than the unvetted generalities they claim to address. Hatchery production in Southeast Alaska represents a large part of our commercial salmon opportunity. Without it, focus on wild stocks would certainly increase, presenting more management issues and probable further reduction of commercial opportunities to mitigate the additional added pressure on wild stocks.

In the last decade, our rural communities have seen incredible challenges in world markets reshape the fishing industry. The effects of this existing volatility will most certainly be exacerbated by these proposals. Our community will see reduced salmon landings fleet-wide due to reduced opportunity. This will logically lead to reduced processor production, which will reduce the need for personnel, which will trickle down to fewer jobs and probable population decrease without some other form of employment opportunity. A host of other negative economic effects in local businesses that support the commercial fishing industry will follow.

The direct risks I anticipate if these proposals succeed in reducing hatchery egg takes are by-products of the subsequent reduction in hatchery returns and the disregard of established science-based management policy. At risk is the evidence-based process we use to manage our salmon resources, as well as the stability of our commercial fishing related economies that keep many rural coastal communities and their businesses afloat, not to mention losing access to the sport fishing and personal use opportunities hatchery production has provided.

If we decide to make our resource decisions based on prejudiced hypotheses rooted in biased thinking rather than rely on well-vetted, unbiased scientific data gathered by a state agency tasked with the stewardship of our precious Alaskan salmon, we are turning a corner onto a path we may never recover from. If upheld, these proposals will be used as precedent-setting examples of how to manage Alaska's salmon that will undoubtedly harm this resource and all the businesses, entities, and individuals that have come to utilize it by opening the door to

supposition-based management, directly disregarding important data from ongoing Alaska hatchery research and the inclusive processes offered by our Regional Comprehensive Salmon Enhancement Plans.

To place blame specifically on Alaska's salmon hatchery programs for wild salmon stock declines without acknowledging the myriad other relevant quantifiable and unquantifiable oceanic and environmental factors is simply laughable. The world's scientific community has universally accepted that the earth is experiencing the effects of global warming. These effects alone present countless challenges to our biomes that manifest themselves in changes in habitats, changes in oceanic feed opportunities, changes in oceanic chemistry, and unprecedented changes in localized climate-driven weather, to name a few. Each of these carries a multitude of trickle-down effects influencing oceanic and riparian salmon habitats in Alaska. We need a much more holistic approach to addressing the complexities of declines in some of our Alaskan salmon stocks.

Hatcheries present a unique partnership in Alaska that offers a well-managed economic opportunity for our state. With a history of science-backed policy and transparency, our hatcheries help our coastal communities and their commercial fishing fleets, processors, and supporting industries remain viable and robust.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

David Thynes  
AK

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Christine Tiedeman. I am a commercial fisherman from Cordova, Alaska, a Tribal member, and a subsistence user.

Proposals 170, 171, and 172 would threaten my income stability, job security, food security, and livelihood. The impacts would extend well beyond individual fishermen—reduced harvest opportunity would mean fewer processing jobs, less food availability, and ripple effects across local businesses and community stability.

I am also concerned that reducing hatchery production could contribute to the loss of certain runs over time, with trickle-down effects across communities and user groups. Canned pink salmon remains an important, affordable protein source for many families and communities, including in emergency food support systems.

Major decisions like this should be based on comprehensive data and careful analysis. Commercial fishing is a foundational pillar of Alaska's economy and coastal way of life, and the Board should not move forward on broad reductions without demonstrated necessity.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Christine Tiedeman  
Cordova, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kanisha Tiedeman, and I am a mother, tribal member, subsistence user, local business owner, community member, and commercial fisherman in Cordova, Alaska. I operate K Lanae Tye Fisheries and Quyanaa Heritage.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would affect our business, our access to fish, our family's livelihood, and our community. Implementing these proposals would result in reduced harvest opportunity, fewer jobs in our community, decreased economic stability, reduced food availability, impacts to tribal and cultural practices, and harm to local businesses.

These resources feed humans globally, and decreased access to harvest would have far-reaching consequences.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kanisha Tiedeman  
Cordova, Alaska



**Submitted by:** Rose Tormohlen

**Community of Residence:** Wasilla

We want our waters closed to trawlers. The way locals are treated versus trawlers isn't right. We can't catch certain fish because numbers are low. But trawlers have millions of pounds of bycatch of the fish we get fined over. Conservation of oceans are important. I respect the laws. But when Alaskans cannot get their own food to survive, THAT is a problem. When we attack and punish the locals and not the trawlers causing the problems, that isn't right. Alaskans shouldn't have to worry about not getting food provided by the land and waters. These Trawlers rape our oceans and we are the ones suffering. Today it's Salmon and halibut. But look at the food chain. What's next? Seal, bear, Orca, us. This needs to be stopped. It's inexcusable and dangerous. How bad does it have to be before you realize how dangerous trawlers are for our livelihood and planet? Please, let's stop them.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is John Tronrud, and I am a local sport and subsistence fisherman with over 50 years of experience in Skagway, Alaska and the Upper Lynn Canal in Southeast Alaska. I have volunteered with a small local science and education hatchery, served on the local advisory board, and watched declining fish size and stocks for years.

The fear that hatchery stocks will cause decline to native stocks is unfounded. Hatchery stocks have been said to be easier to catch commercially and by predation. Native stocks are declining due to pressure from improved catch methods and increased numbers of users across all user groups. If the Board is unwilling to look at improving stock runs and fish size, we are all in trouble.

I speak for myself as the family provider. Proposals 170, 171, and 172 will continue to degrade the total numbers of fish available for harvest. These proposals may not affect me directly today, but we have already been stopped from King salmon retention locally for sport fishermen, and I see the costs of catch and release by the average fisherman. Silver, sockeye, and chum could be next for subsistence.

Reduced harvests will affect local harvests and overall opportunity. A ripple effect of reduced fish for harvest will impact tribal, cultural, and subsistence needs for all. It will also create significant economic costs across all users, and the industry will crash if the total numbers of fish continue to decline.

Regional Comprehensive Salmon Enhancement is vital to all users. To change or stop current actions will destroy runs that currently exist. It is easy to point a finger, but change needs to be based on fact. All factors have cause and effect, and singling out any one user group is unrealistic. I do not understand why the Board objects to hatcheries. The only reason I can think of is political, and I hope that fear is not true.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

John Tronrud  
SKAGWAY, ALASKA/ Upper Lynn Canal SE, Alaska





**Submitted by:** Michael Trotter

Baranof Wilderness Lodge & Beyond Boundaries Expeditions

**Community of Residence:** Sitka Alaska

Dear Alaska Board of Fish,

Thank you for the opportunity to comment on these proposals

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose. It is over due time to take control of the past and irreparable damage to our Alaskan oceans and ecosystems

For that reason, I support Proposals 163, 164, and 165 before the Alaska Board of Fisheries as important steps toward restoring accountability and protecting the foundation of Alaska's fisheries.

Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.

Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.

Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

Reports from the North Pacific Fishery Management Council, along with public testimony from trawl fleet representatives, confirm that so-called “midwater” trawls regularly operate on the seafloor. This contact causes habitat damage and increases threats to the sustainability of critical species such as salmon, crab, and halibut. The lack of required seafloor monitoring or enforcement mechanisms allows these illegal practices to continue unchecked, undermining the integrity of Alaska's sustainable fisheries management, its commitment to habitat protection, and the long-standing regulation governing pelagic trawl use in state waters.

Under Alaska regulation (5 AAC 39.105), pelagic trawl gear is defined as gear that does not contact the seabed or use protective devices that make it suitable for fishing on the bottom. That's clear, fair, and widely understood. It's time to ensure that the definition is honored in practice, not just on paper.

These proposals reflect what Alaskans believe: that our fisheries should be managed with integrity, transparency, and respect for the ecosystems that sustain them. Upholding our own regulations is not anti-industry. It's pro-future. It's how we protect opportunity, abundance, and accountability for generations to come.

Alaska has some of the largest pelagic trawl fleets on the planet. Trawling inevitably impacts the seafloor and seafloor creatures, and we're calling on the Board of Fisheries to protect the ecosystems that underpin our fisheries and coastal communities by upholding common-sense accountability standards.

In Gracere & Respect

Mike Trotter

Baranof Wilderness Lodge

Beyond Boundaries Expeditions

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Nathan Tueller, and I am a commercial fisherman in Prince William Sound, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The economic impact of these proposals cannot be overstated. Commercial fishermen rely on the hatcheries, and any reduction in their output comes directly at our expense. We continue to work with the hatcheries to reduce their operational costs, but those costs are basically fixed. Their operating expenses are paid first through the harvest of salmon they produce, called cost recovery. The remaining hatchery salmon are then available to the commercial salmon fishermen. Sometimes there are a lot, sometimes none. But overall, it is the last 10, 20, or 30 percent of the overall biomass produced by the hatcheries that we get to catch. Any reduction in output hits the fishermen directly — it comes out of our pockets. A 25 percent reduction would have the hatcheries operating, in many cases, just for their own expenses. It would eliminate the portion of their production that we, our families, our businesses, and our deckhands depend on.

This would not only affect the catchers and our deckhands, but our processors, their employees, their suppliers, and everyone downstream. It would have a devastating effect on the communities in my region.

I appreciate that some natural stocks are in decline, particularly kings. I think the hatcheries are exactly the thing that could help them if allowed. I do not believe our pinks and chums compete with kings in the ocean; if anything, they are probably food for those kings. I think on the Kenai, size-specific sports harvesting over the last 60 years or so, combined with tens of thousands of sport fishermen walking over the gravel where these eggs incubate, are more to blame. Statewide, trawler bycatch seems a much clearer smoking gun. Hatchery competition seems a long shot.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Nathan Tueller  
Prince William Sound, Alaska



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Abigail Turner, and I am a former commercial fisherman, current sport fisherman, and community member based in Soldotna, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. As an Alaskan and a neighbor to many who depend on stable fisheries and salmon harvest opportunities, these proposals would decrease opportunity and access to fish for my family, friends, and fellow Alaskans. They would negatively impact Alaska, not just coastal communities.

Hatchery-enhanced runs provide harvest opportunity and employment not just for commercial fishermen, but also stability for guides, the seafood processing sector, marine trades, and subsistence harvesters.

We know that marine conditions, weather, natural variation in salmon runs, and habitat degradation all contribute to future returns. Blaming anything on one particular factor is a dismissal of reality and evidence.

The constant barrage of anti-hatchery proposals is not about conservation. It is anti-small business. I would even venture to say that anti-hatchery proposals are anti-sport fishing, anti-guided angler, and anti-tourism industry. Instead of minimizing hatchery production or imposing moratoriums that are not based on science, we should be strategically enhancing runs that need help. Why not try rebuilding Chinook that way?

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Steve Tutt, and I have been an Alaska resident for 60 years. I am a commercial fisherman, sport fisherman, and fishing charter owner and operator based in Homer, Alaska. I operate the commercial fishing vessel Miss Grande and Homer King Fishing Charters, operating the vessels Redemption and Kings Ransom.

Our Prince William Sound salmon fishery would be nonviable financially without the hatchery programs that have supported four generations of my family. My family currently owns and operates five vessels in Prince William Sound salmon fisheries. A reduction in current hatchery production would create a cascade of financial failures affecting our livelihoods, our community support businesses, and our local sport and subsistence opportunities on the Homer Spit for salmon and across the bay for China Poot and Tutka Lagoon reds and pinks.

Hatchery-funded, science-based studies of fish and the ecosystems they use would cease, and ADF&G does not have funding to continue this much-needed research. Sport and subsistence fisheries used by thousands that are hatchery-created and supported in Prince William Sound and Cook Inlet would cease. The livelihoods of thousands of commercial fishing families, thousands of fish processing workers, and the companies that employ them would be massively impacted, if not eliminated. The economies of coastal communities that rely on sport, subsistence, and commercial fishing, and all the commerce that comes with it, would be financially devastated.

Any discerning user group of Alaska's resources would want the best and most thorough science and research to make wide-ranging reduction decisions on any resource. The fact that significant hatchery research beneficial for long-term planning and decision-making is in process should carry weight in delaying a decision of this magnitude.

We are undoubtedly in a battle for the health of a number of fisheries in our state and across the West Coast. As a collective group, including sport, subsistence, and commercial users, we must stand together, work together, and make the most informed decisions concerning our fishing future together. United, we will all be better off in the long run; divided, we will only inflict damage to one another and our collective opportunity and economy.

I grew up fishing with my dad in the pre-hatchery 1970s. Instability and complete shutdowns of commercial salmon fishing were the catalyst for development of hatcheries in Prince William Sound. My dad was involved with other fishermen in securing original brood and developing hatchery infrastructure at AFK with Armon Koenig. My family and I have continued to make a

living over the last 45+ years because of the predictable consistency hatcheries support. In Prince William Sound, we have seen over the long term a sustainable coexistence of both wild and hatchery stocks, and sport and subsistence users have come to depend on the stable supply of fishing opportunity as well.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Steve Tutt  
Homer, Alaska



Andrew A Umlauf

██████████  
Shoreline WA 98133  
████████████████████

March 1, 2026

Alaska Board of Fisheries  
Statewide finfish and supplemental issues  
March 17-21, 2026 meeting

**RE: PROPOSAL 186, OPPOSE**

I am a UCI drift gillnet permit holder and have participated in the fishery since 2012. I oppose proposal 186. It is a poorly written, highly allocative proposal with incorrect justifications. I am surprised to see it taken up as business at this meeting as **it does not meet the boards own criteria for an agenda change request or emergency and was voted down by most local advisory councils**. This alone is basis for 186 to be rejected. This proposal would have dire consequences for the drift fishery, UCI communities and the salmon resources of Cook Inlet as a whole, yet it has been taken up with little to no public input.

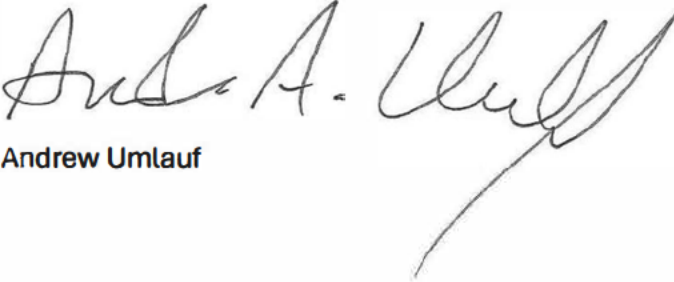
The Drift fleet is already restricted heavily in Federal and State waters for Coho conservation. When federal managers took over management of the EEZ, they copied the State's management plan and even restricted fishing further. The federal plan limits fishing in the second half of July to **one opener per week** and adds a catch limit/quota (TAC) for Coho, which is set at a very conservative 16,619 fish for the 2026 season. If this TAC is caught, the EEZ closes for the season to all commercial fishing. These restrictions are in place to allow Coho passage to northern district streams. Further restrictions to the drift fleet (proposal 186) are allocative, unfair and burdensome.

The proposal states that 200 fathoms of drift gear are allowed in the EEZ for all boats. This is not correct. 200 fathoms are allowed per federal rules in the EEZ, but State of Alaska rules prohibit having more than a legal compliment of gear on board in state waters. The only access to the EEZ is through State waters, making the gear allotment the same for both State or federal fishers, 150 fathoms of gear with one permit and vessels with two permits fishing 200 fathoms. **Participation has actually gone down in the EEZ since federal management has begun**. So, the idea that 186 assumes, more gear and effort are in place in the EEZ since federal management, is incorrect.

The Alaska department of fish and game currently has the flexibility needed to manage UCI salmon stocks. Proposal 186 is a blanket action that takes away this flexibility. It would remove fishing time without regard to coho run size, escapement or stock status. No northern district coho stocks are listed as a stock of concern to my knowledge. The proposal lists no clear conservation goal and nothing exists to tie restrictions to abundance, making it a purely allocative proposal.

With the utmost respect, I ask the board to reject proposal #186 in its entirety for the reasons I have outlined above. Failing this, I would ask the board to defer consideration until the regular BOF meeting for UCI in March 2027.

Respectfully,

A handwritten signature in black ink, appearing to read "Andrew A. Umlauf". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Andrew Umlauf



**Alaska Board of Fisheries**

Alaska Department of Fish and Game  
PO Box 115526 Juneau, AK 99811

**Re:** Proposals 11, 164 and 165

**Chair Carlson Van Dort and Members of the Alaska Board of Fisheries:**

The Under Sixty Cod Harvesters (USCH) is a member organization representing fixed gear vessels participating in the Pacific cod fisheries of the Bering Sea, Aleutian Islands, and Gulf of Alaska. Our members are longtime federal and statewater harvesters, and many of them operate in various other fisheries such as halibut, sablefish, crab and herring. We have regularly voiced our concerns around impacts of bottom contact by mobile gear, in both federal and state management processes.

**We are writing in support of Proposals 11, 164 and 165.**

**Proposal 11 – Closed waters in the Bering Sea and Aleutian Islands: SUPPORT**

USCH has commented frequently on the importance of protecting sensitive benthic habitats and crab populations, not only as foundational for crab species but also for other important groundfish species that rely on a healthy benthic ecosystem. It is reasonable to restrict bottom trawl activity in the proposed area, particularly considering the variable challenges that BSAI crab populations have experienced in recent years. Department comments demonstrate that less than 1% of the trawl harvest in this area occurs in state waters, while 12.6% of golden king crab harvest in this area occurs in state waters. These catch statistics, combined with the well established practice of protecting benthic habitat by limiting mobile bottom contact gear, demonstrates that this proposal would provide meaningful conservation and minimal harm.

**Proposal 164 – Bottom Contact Monitoring for Pelagic Trawl Gear: SUPPORT**

We focused on Proposal 164 rather than 163 because it provides a stronger route toward long-term success for the pelagic trawl fleet, whereas 163 may cause unnecessary fishing disruptions as compliance mechanisms are developed. We support the regulatory compliance principles inherent in both proposals.

State regulation defines pelagic trawl gear as gear that does not operate in contact with the seabed. That definition is explicit. However, ADF&G opposes Proposal 164, stating that the proposal is “unactionable” as written and that a state-water monitoring program may be cost prohibitive. While we respect the Department’s concern regarding program design and cost, the existence of implementation challenges does not eliminate the underlying regulatory compliance issue. Nor do they leave you without an actionable path.

At its core, Proposal 164 presents a choice – whether to defer or affirm parameters for regulatory compliance. By deferring action in favor of status quo, the Board would leave this pivotal question unanswered: **does Alaska, and the Board of Fisheries, intend for pelagic trawl gear to operate in regular contact with the seafloor, or not?** Alaska’s pelagic trawl fisheries are too large, and too important, for that question to remain unanswered. It can be addressed by the Board of Fisheries at this meeting, even if the Board is not supportive of immediate operational or enforcement changes.

We recommend that the Board take action to affirm the intent of the State gear definition, and then focus on a framework for development of regulatory tools that address the concerns cited in the proposal, through

consultation with industry participants and gear experts. In their comments, the Department recommended “coordinating efforts to address trawl effects across federal/parallel fisheries with the Council, NMFS, fishery stakeholders, and state/federal fisheries law enforcement agencies prior to adopting this proposal.” We support that step as the right one for the Board to take at this meeting: affirm Alaska’s gear definition and recommend an iterative, collaborative path for effective enforcement.

The Board retains the authority, and responsibility, to establish legal gear and management provisions in parallel fisheries. That authority exists precisely so the Board can address issues within state waters. **Taking no action would send several harmful messages about that authority:** that the Board is comfortable with the operational disparity between a gear definition and fishing practice; doesn’t consider seafloor contact to be an important difference between bottom trawling and pelagic trawling; considers gear definition compliance to be widely flexible; and would prefer to defer to the federal process for defining legal gear and management provisions for trawling in state waters.

**USCH urges the Board to affirm the pelagic trawl gear definition in relationship to bottom contact, and recommend an iterative course for developing workable, phased compliance mechanisms.**

**Proposal 165 – Salmon Excluders for Pelagic Trawl Gear: SUPPORT**

Salmon excluders are well established technology used extensively in the Bering Sea to reduce salmon bycatch while continuing successful trawl operations. We recognize that there are concerns around cost and adaptation for smaller vessels. We are supportive of a phased approach to ensure excluders can be implemented thoughtfully and successfully.

USCH respectfully asks the Alaska Board of Fisheries to adopt Proposals 164 and 165 and direct a framework for practical, coordinated and phased implementation. Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "Hannah Heimbuch". The signature is written in black ink and is positioned above the typed name and title.

Hannah Heimbuch, Director  
Under Sixty Cod Harvesters

## Proposal 186 Comments

### Coho Escapements, History and Weir Locations in Northern Cook Inlet

#### 1. Coho Escapement Goals (CEG)

A. There are 4 coho rivers and creeks in the northern portion of Cook Inlet. The coho systems with CEG that are annually counted and managed are (See Table 1):

System	Escapement Goal
• Jim Creek	250 – 700
• Fish Creek	1,200 – 6,000
• Little Susitna	9,200 – 17,700
• Deshka River	10,200 – 24,100

B. Please note the following:

- Jim Creek:
  - missed the bottom end of the CEG 2 times in the last 10 years
  - missed the bottom end of the CEG 6 times in the last 29 years
  - exceeded the top end of the CEG 15 times in the last 29 years
  - was within the CEG 8 times in the last 29 years
- Fish Creek:
  - missed the bottom end of the CEG 2 times in the last 10 years
  - missed the bottom end of the CEG 2 times in the last 29 years
  - exceeded the top end of the CEG 9 times in the last 29 years
  - was within the CEG 18 times in the last 29 years
- Little Susitna:
  - missed the bottom end of the CEG 6 times in the last 10 years
  - missed the bottom end of the CEG 11 times in the last 29 years
  - exceeded the top end of the CEG 6 times in the last 29 years
  - was within the CEG 12 times in the last 29 years
  - **Incomplete CEG count 7 times in the last 10 years**
  - **There have been 4 different weir locations over the last 30 years (See Figure 1)**
- Deshka River:
  - missed the bottom end of the CEG 7 times in the last 10 years
  - missed the bottom end of the CEG 12 times in the last 29 years
  - exceeded the top end of the CEG 8 times in the last 29 years
  - was within the CEG 9 times in the last 29 years
  - **Incomplete CEG count 7 times in the last 10 years**

C. Discussion

- Both the Little Susitna and Deshka Rivers have had incomplete coho weir counts for for 7 of the last 10 years.
- Both Jim Creek and Fish Creek have complete counts and do not have the weir problems of the either the Little Susitna or the Deshka River.
- Given the incomplete counts and problems with the Little Susitna and Deshka River weirs, it is impossible to use these 2 systems as indexes for the rest of the 1,200 coho streams in Upper Cook Inlet.

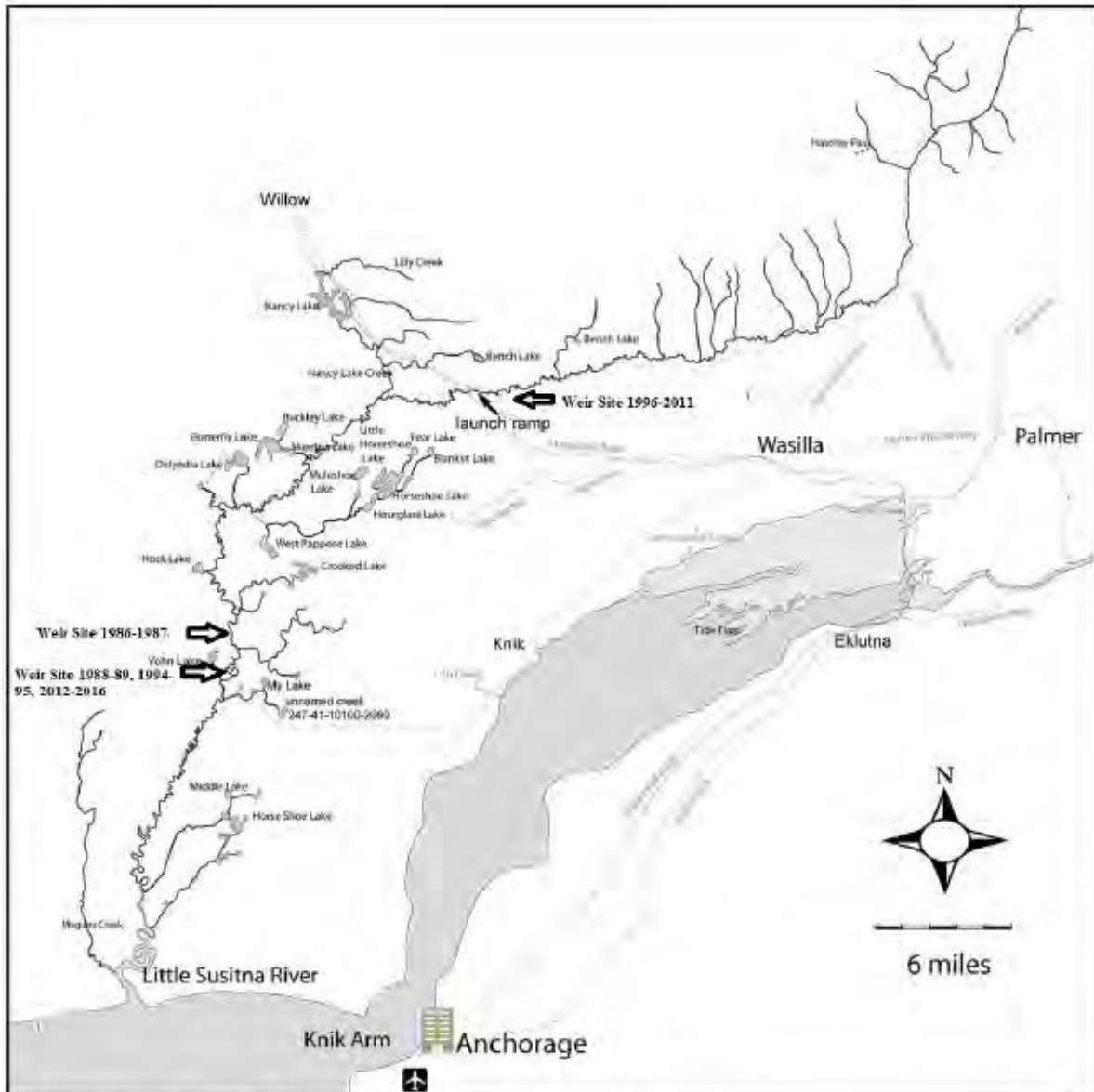


Figure 1.–The Little Susitna River drainage showing weir locations (arrows).

Figure 1 taken from ADF&G Fishery Data Series 20-03.

Year	Jim Creek	Fish Creek	Little Su	Deshka
Esc Goal	250 - 700	1,200 - 6,000	9,200 - 17,700	10,200 - 24,100
1997	701	3,437 <sup>b</sup>	9,894	8,063
1998	922	5,463 <sup>b</sup>	15,159	6,773
1999	12	1,766 <sup>b</sup>	3,017	4,563
2000	657	5,218 <sup>b</sup>	15,436	26,297
2001	1,019	9,247 <sup>b</sup>	30,383	29,915
2002	2,473	14,651 <sup>b</sup>	47,938	24,612
2003	1,421	1,231 <sup>b</sup>	10,877	17,305
2004	4,652	1,415	40,199	62,940
2005	1,464	3,011	16,839	47,887
2006	2,389	4,967	8,786	59,419
2007	725	6,868	17,573	10,575
2008	1,890	4,868	18,485	12,724
2009	1,331	8,214 <sup>b</sup>	9,523	27,348
2010	242	6,977 <sup>b</sup>	9,182	10,390
2011	261	1,428	4,826	7,508
2012	213	1,237 <sup>b</sup>	6,770	6,825
2013	663	7,593 <sup>b</sup>	13,583	22,141
2014	122	10,283 <sup>b</sup>	24,211	11,578
2015	571	7,912 <sup>b</sup>	12,421	10,775
2016	106	2,484	9,998	6,816
2017	607	8,966 <sup>b</sup>	17,781	36,869
2018	758	5,022 <sup>b</sup>	7,583 <sup>c</sup>	12,933 <sup>c</sup>
2019	162	3,025	4,226 <sup>c</sup>	10,445
2020	735	4,555	10,765 <sup>c</sup>	5,368 <sup>c</sup>
2021	1,499	NS <sup>a</sup>	10,923 <sup>c</sup>	3,338 <sup>c</sup>
2022	1,899	3,137 <sup>c</sup>	3,162 <sup>c</sup>	3,168 <sup>c</sup>
2023	378	1,534	3,726 <sup>c</sup>	1,817 <sup>c</sup>
2024	376	235 <sup>c</sup>	964 <sup>c</sup>	642 <sup>c</sup>
2025	450	3,398	4,506 <sup>c</sup>	3,869 <sup>c</sup>
above range	15	9	6	8
in range	8	18	12	9
below range	6	2	11	12
a. Escapement not surveyed or monitored during years with No Survey (NS).				
b. Calculation of percentiles based on escapements in 1969, 1972–1976, 1978, 1997–2003, 2009–2010, 2012–2015, 2017–2018; these were years with no stocking and for which the weir was operated past September 1. Escapements for 1969, 1972–1976 and 1997, were expanded by 25% to account for removal of weir from September 1 to 17. In 1977, the weir was removed in August, and 1979–1996 were excluded because stocked fish returned.				
c. Incomplete counts. Weir washed out or not operated.				



# UNITED FISHERMEN OF ALASKA

Mailing Address: [REDACTED] Juneau AK 99802-0229

Phone: [REDACTED]

E-mail: [REDACTED] Website: [www.ufa-fish.org](http://www.ufa-fish.org)

Alaska Department of Fish and Game  
Board of Fisheries Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

March 1, 2026

**RE: Board of Fish Proposal 11**

Dear Chair Carlson-Van Dort:

The United Fishermen of Alaska (UFA), the statewide commercial fishing trade association representing 35 organizations and thousands of individual fishermen, submits these comments on Proposal 11. UFA represents the full diversity of Alaska's commercial fishing fleet, from small family-owned vessels to large catcher-processors, and our mission is to support the long-term sustainability and economic viability of all Alaska commercial fisheries. Throughout its history, UFA has encouraged following established science-based management processes. Alaska's fisheries are managed through rigorous public processes supported by extensive scientific analysis. UFA is concerned that Proposal 11 lacks adequate information and adoption by the Board of Fisheries (the Board) may set a troubling precedent that could threaten science-based management of other sustainable fisheries across Alaska.

In general, UFA is opposed to the Board placing a ban on *ANY* specific commercial fishing gear types. In this case, UFA is concerned about the Board supporting Proposal 11 without clear identification of the problem Proposal 11 attempts to solve. UFA encourages the Board to distinguish and consider known trawl habitat impacts in the area as noted by best available science versus theoretical impacts. As the Board is aware, extensive habitat protections are already in place throughout the Aleutian Islands region which were created by NOAA fisheries nearly 20 years ago. These actions closed over 95% of the Aleutian Island management area to trawling (see attachment 1). The areas that remain open support important federal and state-managed trawl fisheries and were specifically designed to benefit smaller vessels and local communities in the Aleutian Islands region.

We emphasize the importance of fully understanding what species are targeted by the trawl fleet in the area and whether adequate fishing opportunities for those species exist for the trawl fleet outside the targeted area – especially for under-58 foot vessels in the State water fishery. UFA encourages the Board to carefully review the extensive size of the proposed closure and whether increased communications and voluntary collaboration between fleets within a targeted sub-area could address stakeholder concerns. Importantly, existing trawl fisheries in these areas have

demonstrated extremely low bycatch of golden king crab and shifting effort outside of open areas could increase bycatch and habitat impacts for this species.

UFA appreciates the Board's consideration of our concerns and further recommends that the Board encourage concerned stakeholders in this area to seek non – regulatory resolution amongst one another to address remaining issues.

Regards,



Matt Alward  
President



Tracy Welch  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association  
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve  
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Ekuk Beach Fishermen's Association • Freezer Longline Coalition • Fishing Vessel Owners Assn • Groundfish Forum  
Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture  
Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation  
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance  
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional  
Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	Habitat	BSAI GF FMP Am 78	February 2005	March 22, 2006 <a href="#">71 FR 14470</a>	June 28, 2006 <a href="#">71 FR 36694</a>	July 28, 2006
		BSAI GF FMP 88	March 2007	Nov. 21, 2007 <a href="#">72 FR 65539</a>	Feb. 19, 2008 <a href="#">73 FR 9035</a>	March 20, 2008

## Purpose and Need

The 1996 amendments to the Magnuson-Stevens Act (MSA) require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the MSA as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.”

The Aleutian Islands Habitat Conservation Area (AIHCA) was adopted as part of a suite of conservation measures to minimize the adverse effects of bottom contact fishing in the Aleutian Islands subarea. After the AIHCA was established, fishery participants identified two changes necessary to fulfill the intent of the AIHCA while allowing fishing in areas that had historically been fished. The Council responded by closing additional waters near Buldir Island and opening waters near Agattu island to nonpelagic trawl gear under BSAI GF FMP Amendment 88.

## Analysis

NMFS and the Council published a draft EIS for Amendment 78 in January 2004 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative for HAPCs was to adopt a site-based approach for HAPC designations.

A 74 page EA/RIR/FRFA was prepared for Amendment 88. The two alternatives evaluated were no action and modifying the latitude and longitude definitions for open areas in the AIHCA, changing the boundaries in areas north of Agattu Island

and north of Buldir Island. Alternative 2 was determined to have no significant environmental impacts and would provide socioeconomic benefits through opening a portion of the AIHCA to fishing.

## Regulation Summary

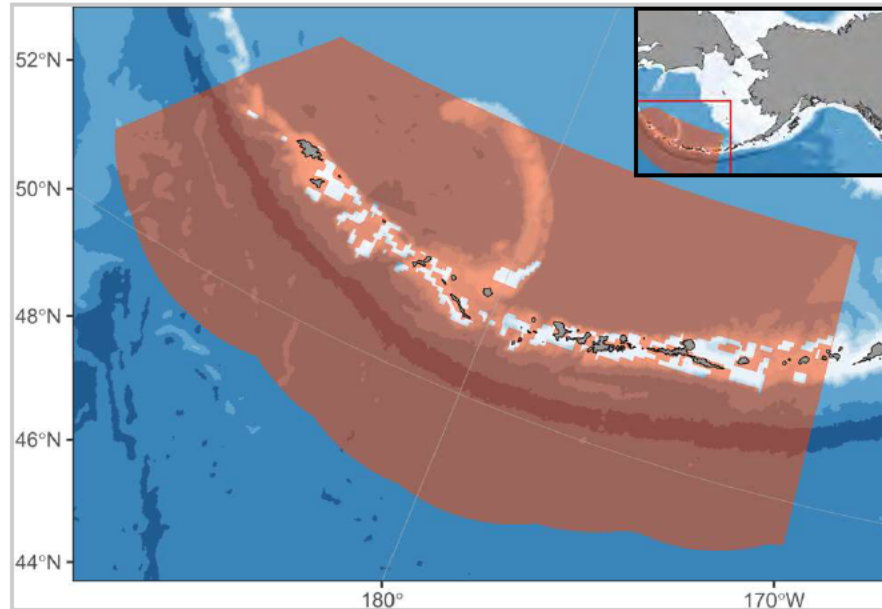
No federally permitted vessel may fish with nonpelagic trawl gear in the Aleutian Islands Habitat Conservation Area. Vessel monitoring system is required for all fishing vessels.

## Conservation Value

Beginning in 2006, over 95% of the Aleutian Islands management area was closed to bottom trawling (950,463 km<sup>2</sup> or 277,100 nm<sup>2</sup>), and about 4% (42,611 km<sup>2</sup> or 12,423 nm<sup>2</sup>) remain open.

This area establishes comprehensive protection for coral and sponge ecosystems, which occur at high densities along the Aleutian Islands and deep water basin/trench areas. Deep sea corals grow very slowly and damage to these corals can take hundreds of years to recover. The habitat created by deep sea coral and sponges provides spawning grounds for species such as rockfish and crabs.

In addition to protecting vulnerable deep-sea corals, sponges and other epifauna from potential impacts of fishing, the prohibition on nonpelagic trawl gear also prevents impacts to the undisturbed sediments and ecosystems of the deeper basin and trench areas.



The Aleutian Islands Habitat Conservation Area

## Prohibitions

- Non-pelagic trawl gear





# Bowers Ridge Habitat Conservation Zone

PC481  
5,284 nm<sup>2</sup>

CCC ABM Report #  
NP3

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	Habitat	BSAI GF FMP Am 78	February 2005	March 22, 2006 <a href="#">71 FR 14470</a>	June 28, 2006 <a href="#">71 FR 36694</a>	July 28, 2006

## Purpose and Need

The 1996 amendments to the Magnuson-Stevens Act require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the Magnuson-Stevens Act as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. The Bowers Ridge Habitat Conservation Zone was recognized as likely to contain high densities of coral and sponge habitat, prompting the Council to close the area to all bottom contact fishing gears.

## Analysis

NMFS and the Council published a draft EIS in January 2004 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative was to establish numerous closures to trawl and bottom

contact gear to minimize adverse effects of fishing on EFH.

## Regulation Summary

No federally permitted vessel may fish with mobile bottom contact gear, including dredges, non-pelagic trawl, and dinglebar gear, in the Bowers Ridge Habitat Conservation Zone.

## Prohibitions

- Mobile bottom contact gear, including:
  - Dredge
  - Nonpelagic trawl
  - Dinglebar

## Conservation Value

As a precautionary measure, the Council voted to prohibit mobile fishing gear that contacts the bottom (i.e. dredges, nonpelagic trawls, and dinglebar gear) within this 18,131 km<sup>2</sup> (5,286 nm<sup>2</sup>) area.

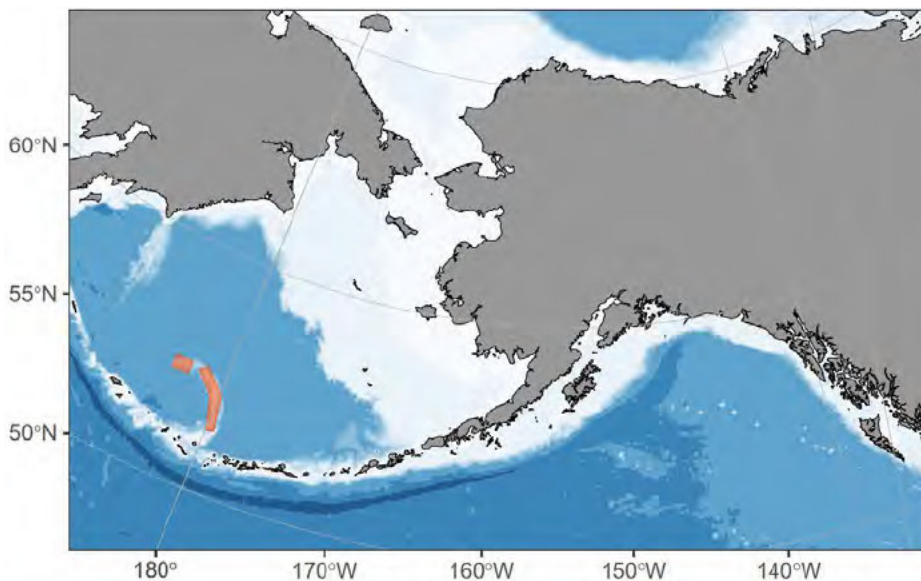
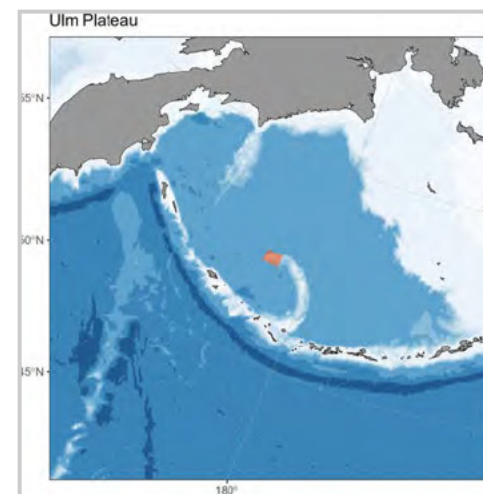
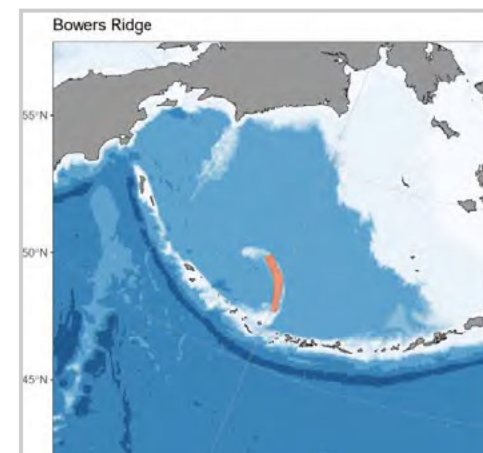
While Bower's ridge is relatively unexplored, it is likely to provide habitat for cold-water corals and sponges, as well as fish and crab species.

These area establish nearly full protection for the underwater ridge ecosystems north of the Aleutian Islands. Gear prohibitions in these areas was determined to have the greatest positive effects on biodiversity in the area, as they prevent impacts to the undisturbed sediments and ecosystems in these relatively intact and undisturbed ecosystems.

## Sub Areas

The Bowers Ridge Habitat Conservation Zone is comprised of two separate areas:

- Bowers Ridge (3,937 nm<sup>2</sup>)
- Ulm Plateau (1,347 nm<sup>2</sup>)



The Bowers Ridge Habitat Conservation Zone



Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	Biodiversity & Vulnerable Ecosystems	BSAI GF FMP Am 65/78	February 2005	March 22, 2006 <a href="#">71 FR 14470</a>	June 28, 2006 <a href="#">71 FR 36694</a>	July 28, 2006

## Purpose and Need

Council evaluated BSAI FMP Amendments 65 and 78, designating areas as Habitats of Particular Concern (HAPC) to highlight research areas and protect fragile coral habitats.

The 1996 amendments to the Magnuson-Stevens Act require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the Magnuson-Stevens Act as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.” Habitat Areas of Particular Concern (HAPC) are those areas of EFH that are particularly important as fish habitat, or are particularly vulnerable to depredation.

Submersible observations identified high densities of corals and sponges in the Aleutian Islands area. The Council voted to protect these “coral garden” areas and develop a comprehensive plan for research and monitoring to improve scientific information about this area and evaluate the effectiveness of fishery management measures to protect this habitat.

## Analysis

NMFS and the Council published a draft EIS in January 2004 for GOA FMP Amendments 65/73 and BSAI FMP Amendments 65/78 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative for HAPCs was to adopt a site-based approach for HAPC designations.

In addition to the Aleutian Islands Coral Habitat Protection Areas, other HAPC sites in Amendments 65 and 73 included HAPCs for Seamounts in the EEZ and corals in the Gulf of Alaska.

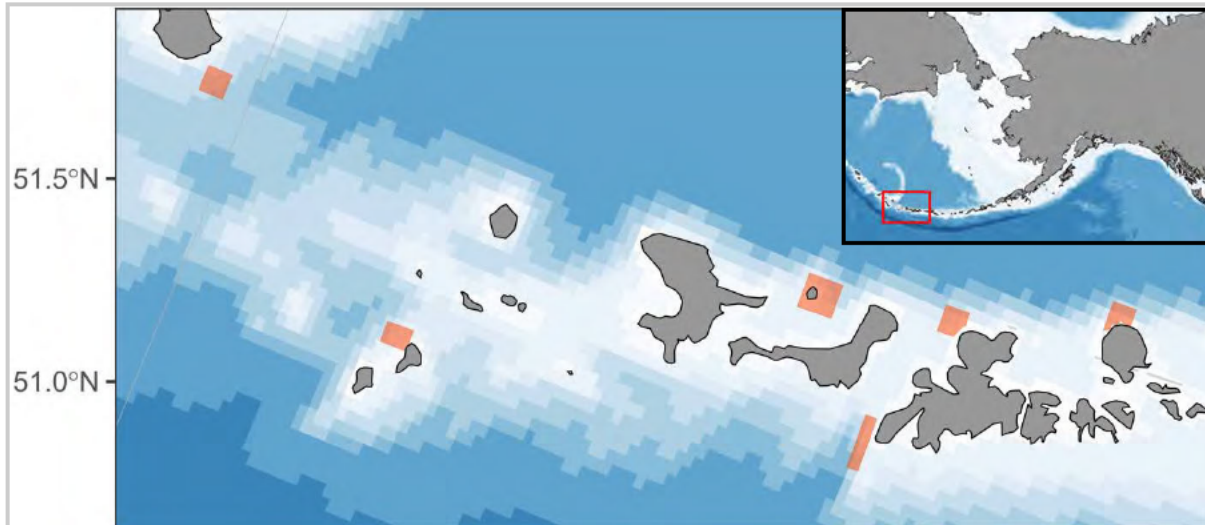
## Regulation Summary

No federally permitted vessel may fish with mobile bottom contact gear in the Aleutian Islands Coral Habitat Protected Areas.

Beginning in 2006, these areas were closed to all bottom contact fishing gear (longlines, pots, trawls, etc.) and cover a total area of 377.3 km<sup>2</sup> (110 nm<sup>2</sup>). To improve monitoring and enforcement of the Aleutian Island closures, a vessel monitoring system (VMS) was required for all fishing vessels. Additionally, a comprehensive plan for research and monitoring will be developed to improve scientific information about this area, and improve and evaluate effectiveness of these fishery management measures.

## Conservation Value

These areas provide protection of these undisturbed coral and sponge areas in the Aleutian Islands from potential impacts of fishing gear. Deepsea coral habitats provide breeding areas, refuge and rich feeding grounds for a wide variety of species. These six sites with especially high densities of corals and sponges (the so-called “coral garden” areas) were delineated based on submersible observations. Deep sea corals grow very slowly and can be thousands of years old. Damage to these corals can take hundreds of years to recover. The habitat created by deep sea coral and sponges provides spawning grounds for species such as rockfish and crabs.



The Aleutian Islands Coral Habitat Protection Areas

## Prohibitions

- All bottom contact gear:
  - Nonpelagic trawl
  - Dredge
  - Dinglebar
  - Pot
  - Hook and line



Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	Vulnerable Species	BSAI GF FMP Am 70	October 2001	Jan. 8, 2002 <a href="#">67 FR 956</a>	May 16, 2002 <a href="#">67 FR 34860</a>	Implemented Through Regulations

## Purpose and Need

In 1990, NMFS designated Steller sea lions as a threatened species under the ESA. The designation followed severe declines throughout much of the GOA and Aleutian Islands region. In 1993, NMFS designated critical habitat for the species, including the marine areas within 20 nautical miles (nm) of major rookeries and haulouts west of 144° W longitude (long.) and three large aquatic foraging areas.

In the 2001, NMFS recognized that the decline of the species was likely due to multiple factors including environmental changes such as El Nino and the Pacific Decadal Oscillation, predation, subsistence harvests, incidental take in fisheries, and competition for prey resources with pollock, Pacific cod, and Atka mackerel fisheries. This last issue, competition

with fisheries, is addressed by this action.

On November 30, 2000, NMFS issued a biological opinion on the Groundfish FMPs, which determined that the pollock, Pacific cod, and Atka mackerel fisheries were likely to jeopardize the continued existence of the western DPS of Steller sea lions and to adversely modify its critical habitat. This opinion contained a reasonable and prudent alternative (RPA) including large fishery closure areas, harvest limits, and seasonal harvest distribution for pollock, Pacific cod, and Atka mackerel fisheries. Before the RPA could be implemented, President Clinton signed Public Law 106-554 on December 21, 2000, which contained a 1-year timetable to phase in the RPA. This year provided the Council with time to develop alternative protection measures that would avoid jeopardy and adverse modification of critical habitat for

Steller sea lions

NMFS issued a final rule to implement Steller sea lion protection measures to avoid the likelihood that the groundfish fisheries off Alaska would jeopardize the

continued existence of the western DPS of Steller sea lions or adversely modify its critical habitat. These management measures disperse fishing effort over time and area to provide protection from potential competition for important Steller sea lion prey species in waters adjacent to rookeries and important haulouts. The intended effect of this final rule was to protect the endangered western DPS of Steller sea lions, as required under the Endangered Species Act (ESA), and to conserve and manage the groundfish resources in the Bering Sea/Aleutian Islands management area (BSAI) and the Gulf of Alaska (GOA) in accordance with the Magnuson-Stevens Fishery Conservation and Management Act.

## Analysis

A 2,227 page SEIS (dated November 2001) was prepared for Steller Sea Lion Protection Measures in the Federal Groundfish Fisheries Off Alaska. Five alternatives were evaluated: no action allowing regulatory measures designed to protect Steller sea lions to expire, a low and slow approach establishing lower TACs and implementing measures to spread catches throughout the year, a restricted and closed area approach establishing large areas of critical habitat where fishing is prohibited and restricting catch in remaining critical habitat, an area and fishery specific approach allowing different management measures in three areas (AI, BS, and GOA) including fishery specific closed areas around rookeries and haulouts with seasons and catch apportionments (preferred alternative), and a critical habitat and catch limit approach with seasonal apportionments and harvest limits within critical habitat in proportion with

estimated fish biomass. Alternative four had 3 options: a small boat exemption in Chignik, a small boat exemption in Unalaska, and gear specific zones for GOA Pacific cod fisheries.

## Regulation Summary

There are site-specific regulations that prohibit fishing for pollock, Pacific cod, or Atka mackerel by different gear types from 3 nm, 10, nm, and 20 nm around the Steller sea lion rookery or haulout area. The harvest of these prey species for Steller sea lions in these areas was evaluated, and specific fisheries were prohibited to reduce the potential of competition for prey. At some sites, there may be minor fishing effort rockfish, sablefish, and halibut. While not prohibited outside of 3 nm, there are no recreational fisheries in these areas.

## Conservation Value

The rookery and haulout areas in the Aleutian Islands Subarea are designated as critical habitat for Steller sea lions and the regulations protect sea lions from any potential competition with fisheries for prey.

In addition to mitigating potential effects of fishing on Steller sea lions, the MPA's also offer localized protection to deep-sea coral and sponge communities along the Aleutian Islands. Submersible observations have found areas with complex coral and sponge communities within the areas encompassed by the MPA's, although the absolute amount of protection to this habitat has not been quantified.



Steller Sea Lions at Cape Izigan, Unalaska Island



Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	Vulnerable Species	BSAI GF FMP Am 70	October 2001	Jan. 8, 2002 <a href="#">67 FR 956</a>	May 16, 2002 <a href="#">67 FR 34860</a>	Implemented Through Regulations

**Sub Areas**

**Yunaska Island**

Directed fishing for pollock and trawling for Pacific cod is prohibited within 10 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

**Bumpy Point**

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; and for Atka mackerel 3/20 nm depending on area.

**Seguam Island South Side**

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 12 nm for Atka mackerel.

**Amlia Island East, Tanadak Island (Amlia), Finch Point, Amuka Island & Rocks, and Chugulak Island**

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

**Bobrof Island, Kanaga Island North Cape, Little Kanaga Strait, Great Sitkin Island, Anagaksik Island, North Cape, Amilia Island Sviech Harbor, and Sagigik Island**

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; within 20 nm for Atka mackerel

**Agligadak Island and Saddleridge Point**

Directed fishing for pollock prohibited within 10 nm of rookery/haulout area; all fishing for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

**Ship Rock, Adak Island, and Kasatochi Island**

Directed fishing for pollock prohibited within 10 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; within 20 nm for Atka mackerel

**Alaid Island, Shemya Island, Sobaka & Vega, and Chirikof Point**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area, and 3 nm for Atka mackerel.

**Krysi Point, Cape St. Stephan, and Cape Ivan**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and 20 nm for Atka mackerel

**Sirius Point, Tanadak Island (Kiska), Nitrof Point, Unalga & Dinkum Rocks, and Kavalga Island**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and 3 nm for Atka mackerel.

**Ugidak Island and Segula Island**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and for Atka mackerel 3/20 m depending on area.

**Buldir Island**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; Pacific cod fishing is prohibited within 10 nm for all gears, and 10 nm for Atka mackerel.

**Cape St. Stephan, Cape Wrangell, Gillon Point, Cape Sabak, Leif Cove, and Hasgox Point**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots, and 10 nm for Atka mackerel.

**Tag Island and Gramp Rock**

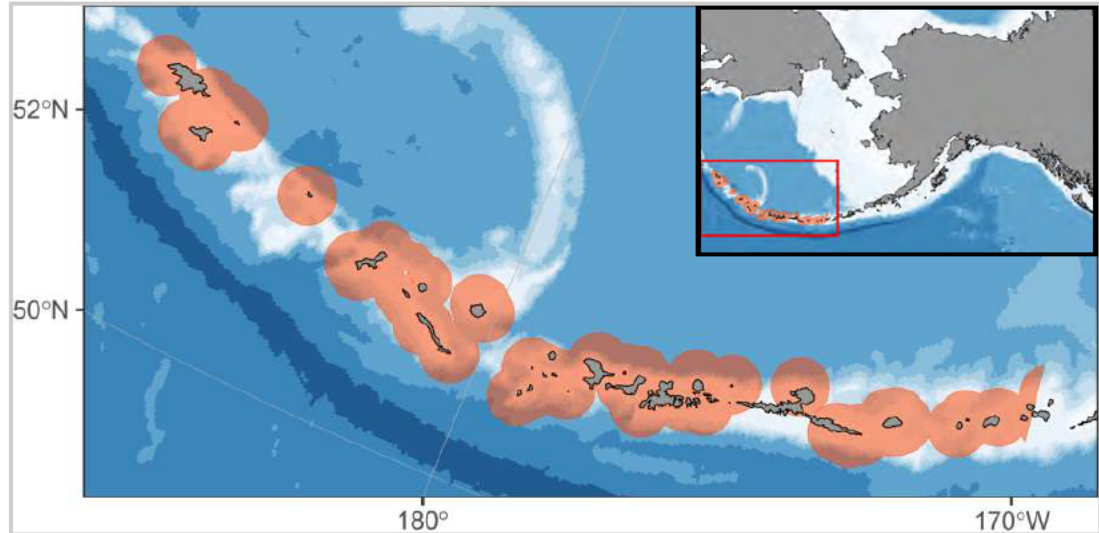
Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; and 10/20 nm for Atka mackerel depending on area.

**Ayugadak Point, Column Rocks, East Cape, Petrel Point and Pochnoi Point**

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; and 20 nm for Atka mackerel.

**Prohibitions**

- \* Prohibitions vary by site, but may include prohibitions on directed fishing for pollock, Pacific cod, or Atka mackerel, out to specified distances from the haulout or rookery.



Sea Lion Protection Areas in the Aleutian Islands Subarea





# UNITED FISHERMEN OF ALASKA

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March 1, 2026

Alaska Department of Fish and Game  
Board of Fisheries Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: Opposition to Proposals 163 & 164 – 5 AAC 39.105, Types of Legal Gear**

Dear Chair and Members of the Board,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state and in federal waters off Alaska's coast. UFA submits the following comments in opposition to Proposals 163 and 164.

UFA supports compliance with existing Alaska statutes and regulations governing trawl gear, including the current definition of pelagic trawl gear in 5 AAC 39.105 and its prohibition on seafloor contact. Maintaining clear, enforceable standards that protect marine habitat while allowing lawful fisheries to operate is fundamental to Alaska's fisheries management framework. However, Proposals 163 and 164 would establish a new presumption that all trawl gear operated in state waters is bottom-contact gear unless operators can affirmatively prove otherwise through Department-approved monitoring technology. As drafted, these proposals would impose a compliance standard that is not currently feasible to meet in a consistent, reliable, and enforceable manner.

Proposal 163 would require the Department to create a verification system for "midwater status" and to define acceptable proof of no seafloor contact. Proposal 164 would mandate the installation of Department-approved seafloor contact detection systems capable of real-time or near-real-time verification. While the intent of improving accountability is understandable, the technology necessary to conclusively verify the absence of any bottom contact under all operating conditions is not yet sufficiently developed, standardized, or field-tested for universal application in Alaska state waters.

UFA recognizes that questions regarding gear behavior, enforcement consistency, and evolving monitoring technologies merit continued evaluation. We support collaborative efforts among industry, the Department, and enforcement agencies to assess the feasibility, reliability, and cost implications of emerging monitoring tools before mandatory standards are adopted.

In addition, vessel configuration varies widely across the fleet. For some operators, particularly smaller platforms, retrofitting vessels with sophisticated sensor arrays and electronic monitoring

systems may not be physically or economically practical. The result could be the unintended exclusion of otherwise lawful participants based not on demonstrated violations, but on their inability to meet a technologically complex and evolving standard.

These proposals would also require the Alaska Department of Fish and Game to design, approve, implement, and enforce a new monitoring and compliance framework. Such a program would carry significant administrative and fiscal implications. At present, no comprehensive structure exists within state management to support the development, calibration, data management, and enforcement oversight contemplated in these proposals.

Alaska's fisheries are already subject to extensive state and federal management, habitat protections, and Essential Fish Habitat assessments in both the Bering Sea and the Gulf of Alaska. Any additional regulatory framework should be science-based, enforceable, economically practical, and implemented only when the necessary technical and administrative systems are demonstrably capable of achieving their intended purpose.

We respectfully urge the Board to reject Proposals 163 and 164 as drafted.

UFA remains committed to working collaboratively with the Board, the Department, and stakeholders to ensure Alaska's fisheries continue to operate sustainably, responsibly, and in compliance with established law.

Thank you for your consideration.

Regards,



Matt Alward  
President



Tracy Welch  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association  
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve  
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn Groundfish Forum • Kodiak Regional Aquaculture  
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association  
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel  
Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance  
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association  
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association



# UNITED FISHERMEN OF ALASKA

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March 1, 2026

Alaska Department of Fish and Game  
Board of Fisheries Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

## **RE: UFA's Opposition to Proposals 167, 168, 186, 187 and Support of Proposal 169**

Dear Chair and Members of the Board,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state and in federal waters off Alaska's coast. UFA submits the following comments:

### **Proposals 167 and 168 - Oppose**

UFA Opposes proposals 167 and 168. UFA recognizes that there may have been issues around gear type used in the commercial Pacific Cod jig fishery around Kodiak, but do not support such substantial changes to Statewide regulations to solve a regional issue. While it may fix issues and increase enforcement's abilities in one region of the State, it would cause operational harm to commercial fishermen in other regions of the State that are not seeing similar issues.

### **Proposal 169 - Support**

UFA supports proposal 169. 169 would create a definition of the relatively new gear type commonly referred to as "slinky pots." Slinky pots are listed as a legal gear type for many groundfish fisheries throughout the State, but the gear type is not yet defined. This proposal will close the gap and provide a definition for an already legally and widely utilized gear type.

### **Proposal 186 - Oppose**

UFA opposes proposal 186. UFA opposed the adoption of this proposal as ACR 5 in the October 2025 Work Session and maintain our opposition to this as proposal 186. UFA has a longstanding opposition to actions before the Board of Fisheries that would reduce or restrict commercial fishing activity in the State of Alaska when there is no biological or ecological necessity. This proposal has the potential to significantly reduce both time and area for the Cook Inlet drift fishery. The main driver of this proposal is coho escapement in Upper Cook Inlet river systems,

which have been experiencing weather and funding related issues at the weir sites used for tallying coho escapement. UFA believes that the best course of action is to instead focus on getting proper enumeration of coho in Upper Cook Inlet rivers to establish if there is escapement concerns before deciding whether or not to close down a fishery that is just getting back on its feet.

### **Proposal 187 - Oppose**

UFA opposes proposal 187. UFA opposed the adoption of this proposal as ACR 8 in the October 2025 Work Session and maintain our opposition to it as proposal 187. UFA has a longstanding opposition to actions before the Board of Fisheries that would reduce or restrict commercial fishing activity in the State of Alaska when there is no biological or ecological necessity. There is very little commercial harvest on the Tsiu or Kaliakh Rivers annually, due to high cost of operating in the area and the Department has not expressed concerns with managing for both commercial and sport fishing in the geologically dynamic Yakataga Management Area. This proposal would take away Department tools that allow them to adapt annually through in season E.O. management and annually adjustable markers. Due to the geologically dynamic nature of the region, the Yakataga Management Plan gives the Department the authority to move the commercial set net regulatory boundaries based on the annual movement of the Tsiu and Kaliakh Rivers. It is also noted that while a winter storm merged the mouths of the Tsiu and Kaliakh, it is not unlikely that future storms could again shift the two river's outflows.

UFA remains committed to working collaboratively with the Board, the Department, and stakeholders to ensure Alaska's fisheries continue to operate sustainably, responsibly, and in compliance with established law.

Thank you for your consideration.



Matt Alward  
President



Tracy Welch  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association  
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve  
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Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association  
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association





# UNITED FISHERMEN OF ALASKA

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Alaska Board of Fisheries  
Board Support Section  
Attn: BOF Comments  
PO Box 115526  
Juneau, AK 99877-5526

## RE: Opposition for proposals 170,171 and 172

Dear Chair Carlson-Van Dort and members of the Alaska Board of Fisheries:

United Fishermen of Alaska (UFA) is a statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. UFA has taken positions of the following proposals for the March 17-20<sup>th</sup> Statewide Finfish and Supplemental Issues, Board of Fish meeting:

### Proposal # 170: OPPOSE

UFA is opposed to proposal 170. UFA opposes proposals that seek to reduce hatchery production and has opposed this proposal in all of its previous forms since introduced as an ACR 2 in 2018. Proposal 170 is another attempt to simply re-order the words of proposal 156, rejected (2/5) and proposal 78, rejected (1/5) during the 2024/2025 board cycle in Southeast and Prince William Sound. This proposal fails to consider the economic impacts a 25% reduction in pink and chum production would have on all statewide salmon harvesters. Hatcheries produce nearly 1/4 of Alaska's salmon harvest, generate up to 4200 jobs and create an economic impact of approximately \$576M annually<sup>1</sup>. A reduction of this magnitude will have dire impacts to commercial fisheries, seafood processing industries and coastal communities around the state and create cascading impacts to the viability of other hatchery programs, which will support sport, and other noncommercial harvesters. The proposer provides no new conclusive scientific evidence to link any negative effect of hatchery production to the health or abundance of other wild salmon stocks.

### Proposal #171: OPPOSE

UFA is opposed to proposal 171. Again, UFA is opposed to proposals that seek to reduce hatchery production. Proposal 171 requests changes to PWS hatchery production sufficient to reduce straying to achieve a 2% stray rate as stated in the 1995 *PWS/Copper River Comprehensive Salmon Management Plan*. The 2% stray rate is exclusive to the PWS plan, is not incorporated into any other regional salmon management plan and the

<sup>1</sup> Economic Impacts of Alaska hatcheries – McKinley Research Group 2024

threshold for straying was a recommendation for the consideration of optimizing hatchery production. As stated in the document, inclusion of the threshold was not well supported by members of the RPT at that time, and further recommends ongoing research be used to determine the effects of hatchery straying. This work is currently being conducted on a broad scale through the Alaska Hatchery Research Project. The ADF&G pilot study for Lower Cook Inlet (LCI) streams referenced in the proposal does not conclude that PWS hatchery strays are negatively affecting the productivity or sustainability of LCI pink salmon. There are no stocks of concern currently listed for LCI pink salmon.

**Proposal # 172: OPPOSE**

UFA is opposed to proposal 172. UFA does not support any board-generated regulation that caps or limits hatchery production by the Alaska Board of Fisheries. Authorization of hatchery permits and production is an exclusive responsibility of the ADF&G Commissioner, considering available science and the precautionary principle, economic need and program viability to evaluate new production requests. UFA questions the board's authority to set hatchery production through regulation, as its role beyond the consideration of the original hatchery permit request is limited to the allocation of hatchery produced salmon. It should not adopt regulation that limits or conditions a hatchery permit through a moratorium because it clearly restricts the authority of the Commissioner and removes the Regional Planning Team's role in defining regional production, as granted in 5 AAC 40.340. The proposed moratorium would prohibit future hatchery production until the "resolution of uncertainty in the science regarding hatchery-wild effect" can be determined. UFA would point out that some of those uncertainties may never be determined, given the scope and cost of the research required to achieve certainty.

The Board has consistently continued to defer decision-making and oversight of hatchery programs to the Commissioner and ADF&G. UFA encourages the Board to continue in this vein by rejecting proposals 170, 171 and 172.

2024 marked the 50<sup>th</sup> year of the Alaska's Private Nonprofit Hatchery Program. Alaska's hatcheries are center to the sustainability and economic viability of our commercial, sport, subsistence and personal use fisheries, each of which rely on substantial hatchery production. UFA supports the ongoing efforts of the Alaska Hatchery Research Project to better quantify hatchery-wild interactions. Until that research is concluded, its findings are put into perspective and evaluated against existing hatchery policy by ADF&G, the board should refrain from taking any of the above requested actions.

Thank you for your careful consideration of our comments. UFA looks forward to participating in further discussions regarding these proposals.

Regards,



Matt Alward  
President



Tracy Welch  
Executive Director

# UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 \* (253) 279-0707 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)

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

February 28, 2026

Dear Chair Carlson-Van Dort and Board of Fisheries members-

United Southeast Alaska Gillnetters will offer comments for the following proposals before you for consideration at Statewide Finfish in Anchorage March 17-21, 2026.

**Proposal 170- Oppose.** Our organization has opposed every proposal that would allow the Board of Fisheries to dictate hatchery production. We will continue to do so, as we understand the Regional Planning Team process, which makes recommendations to the commissioner for permitting. The RPT meetings are public noticed, and at least in SEAK are very accessible for comments and questions from anyone willing to participate. All permitting is done within the bounds of the Sustainable Salmon Policy and using the precautionary principle.

A 25% reduction would be economically crippling to the hatchery programs themselves, and the fishermen and processors that use that production. All three commercial gear groups in SEAK are dependent on hatchery chum production. It has helped immensely to keep us viable. Sport fishing opportunity would also be impacted, as many sportfishermen target hatchery produced king salmon and coho. A 25% reduction in chums and/or pinks would reduce revenue to the PNP's. As kings and coho are much more expensive to raise than chums and pinks, those programs would likely be the first to go.

The proposer contends wild runs are being impacted by hatchery production. In SEAK, the Chilkat and Taku Rivers have recently had robust king salmon returns, and sockeye returns have been solid. While we have seen small fish some years, we also saw that prior to the time period when there were large hatchery programs. In recent years, sockeye sizes have been normal, and king salmon sizes also appear to be increasing.

**Proposal 171- Oppose.** We do not believe consideration of this proposal is in the purview of the Board of Fisheries. It is in the purview of the PWS RPT, and the Commissioner of Fish and Game, in accordance with the Sustainable Salmon Policy and using the precautionary principle.

Salmon are colonizers, so straying of any salmon is natural. There is little, if any conclusive data to indicate what a natural stray rate is, or what triggers straying. There is no conclusive evidence that strays have a deleterious impact on wild fish.

**Proposal 172- Oppose.** We cannot support a board generated proposal that would go outside the prescribed process for permitting enhanced releases. The proposer implies that the Alaska Department of Fish and Game has either been either negligent or inept in the consideration of hatchery releases, and that the BOF should take it out of the hands of the current statutory process.

That somehow, a politically appointed board would come to a more correct decision than a bunch of scientists, whose expertise in the subject matter far exceeds any board members. It would be presumptuous for the board to act on this, or Proposals 170 and 171 based on “may”, “could be”, or “might”. These are words not often associated with conclusive science. If the board has an opinion of the permitting of hatcheries, they are free to express those opinions to the commissioner, or the RPT’s for their consideration in permitting. In fact, all three of these proposals would be better served, and the public better served, if they were submitted as agenda items to the appropriate Regional Planning Teams.

We appreciate the opportunity to comment, and will be available at the meeting to further discuss these proposals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch', with a stylized flourish at the end.

Max Worhatch, Executive Director

Valdez, AK. 99686

Valdez, AK 99686



February 28, 2026

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: 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  
Proposal 171 - 5 AAC 40. XXX New Regulation - Amend Prince William Sound hatchery permits to reduce pink salmon egg take capacity  
Proposal 172- 5 AAC 40.XXX New Regulation - Board generated regulation that places a moratorium on pink and chum hatchery production

Chairman Carlson-Van Dort and Members of the Alaska Board of Fisheries:

Thank you for the opportunity to submit comments on proposals submitted to the Alaska Board of Fisheries (Board) at the Statewide Finfish and Supplemental Issues meeting this year. The Valdez Fisheries Development Association, Inc. (VFDA) provides the following comments **in strong opposition to Proposals 170, 171, and 172.**

VFDA Pink Salmon production contributes significantly to the economies of Southcentral Alaska. From 2020-2025, Prince William Sound (PWS) seiners harvested an annual average of 80 million pounds of VFDA pink salmon worth \$43 million.<sup>1</sup> In 2025 alone, VFDA's estimated return of 26 million pink salmon provided nearly 70% of the ex-vessel value to PWS seiners.<sup>2</sup>

VFDA Coho Salmon production has created one of the largest sport fisheries in Southcentral Alaska. Juvenile coho salmon releases supported an annual average sportfish harvest of 26,800 coho salmon from 2017-2024.<sup>3</sup> Shore-side anglers caught an additional 10,300 pink salmon during that same period. Coho returns generated approximately \$9.9M in sportfish economic impact during that time, primarily within the community of Valdez<sup>4</sup>. In addition, VFDA releases 20,000 SGH coho annually at no charge through a cooperative partnership with the Native Village of Tatitlek to provide subsistence harvest opportunities for its residents.

There is no statutory mechanism to collect sport fish revenue from users to fund private nonprofit hatchery sportfish programs in Alaska. Pink salmon production at Solomon Gulch Hatchery funds an estimated 65% of this fisheries enhancement program. When capital costs for infrastructure construction and debt retirement are included, this percentage is even higher. **Without the permitted pink salmon production at SGH to fund sport fisheries development, there would be no coho sport fish program in Valdez!**

The economic, social, and cultural benefits of VFDA's enhancement programs, like those of all Alaska's private nonprofit salmon hatcheries, are vast and far-reaching. For these reasons, any attempt to reduce its

<sup>1</sup> Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)

<sup>2</sup> Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)

<sup>3</sup> Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)

<sup>4</sup> Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)

permitted egg take capacity, or for the Board to stray beyond its statutory authority is taken very seriously and VFDA will vigorously defend its ability to maintain our programs that provide continued benefits to Alaska's sport, commercial, and subsistence fisheries.

The adoption of these proposals will have real consequences to hatchery contributions to sport fisheries. VFDA stands at the precipice of a milestone decision on whether to invest nearly \$10 million in constructing a new coho and Chinook Salmon rearing facility to enhance our existing coho smolt program and eventually provide significant chinook salmon sportfish opportunities. This decision requires confidence that our pink salmon program can continue operating without disruption. Board actions that condition hatchery permits undermine that confidence and could terminate further consideration of this investment.

VFDA submits the following comments in opposition to proposals 170,171, and 172.

**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**

This proposal has been submitted repeatedly since 2018, and each time the Board has appropriately rejected it. No new information has been presented to substantiate claims that Alaska hatchery production is negatively impacting wild salmon stocks, particularly in Western Alaska. Frequently cited opinion papers on pink salmon interactions fail to demonstrate any mechanistic link showing that hatchery pink or chum salmon is causing harm. In contrast, hatchery operators have consistently provided scientific research demonstrating that climate, predation, and environmental conditions affecting fresh water residency-such as permafrost melt, water flow, and temperature-are primary drivers affecting these stocks. We have demonstrated that hatchery pink salmon abundance makes up just 15% of all pink salmon in the North Pacific Ocean, Alaska hatchery production accounts for roughly 4% of that total, and less than 0.5% of the total nekton biomass<sup>5</sup>-hardly sufficient to create the large-scale trophic disruptions to the marine food web that have been suggested.

Adoption of Proposal 170 would have immediate impacts on VFDA. The following points were submitted as PC620 at the PWS/CR Finfish meeting in 2024 as response to Proposal 78. Because the proposal remains unchanged, these summarized comments, submitted previously remain relevant:

- VFDA's permitted pink salmon egg take capacity would be reduced by 67.5 million eggs, leaving 202.5 million eggs-levels not operated under since 1992. Total PWS egg takes of pink and chum salmon would be reduced by 199 million and 41 million eggs, respectively.
- While annual returns depend on ocean conditions, based on an historic average marine survival rate of 6.27% for SGH, the seine fleet could lose approximately 4 million adult pink salmon annually beginning in 2029. At an average grounds price of \$0.41<sup>6</sup> per pound, this represents an estimated \$5.5M loss in annual ex-vessel value from VFDA alone.
- Total PWS ex-vessel losses from a 25% production reduction are estimated at \$10.8M in pink salmon and \$3.6M in chum salmon, based on a ten-year average (2012-2024<sup>7</sup>). Losses in first wholesale value to seafood processors, raw fish taxes, and enhancement tax to hatchery operators would exponentially compound these impacts
- In 2024, the total commercial harvest for PWS pink salmon was 9.95 million salmon, the lowest pink salmon harvest since 1993 and 1.70 million chum salmon triggering a disaster declaration as fishermen experienced combined losses approaching \$85 million<sup>8</sup>. Hatcheries contributed 30% of the statewide commercial salmon harvest.<sup>9</sup> Hatchery pink and chum salmon comprised roughly 90% of hatchery-

<sup>5</sup> High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate (Wertheimer, Heard 2018)

<sup>6</sup> Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1)

<sup>7</sup> Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1&2)

<sup>8</sup> Letter from Governor Dunleavy to Acting Secretary of the U.S. Dept. of Commerce- January 2025

<sup>9</sup> Regional Information Report No. 5J25-02 – ADF&G

produced fish and generated approximately \$47 million in ex-vessel value that year.<sup>10</sup> A 25% reduction would have removed nearly \$12 million from an already distressed fishery.

- Reducing production of the most abundant salmon species would set a precedent with ripple effects throughout the seafood industry. Reduced hatchery harvest opportunity would increase pressure on wild stocks.
- The instability created by this action may affect our ability to borrow funds from the enhancement revolving loan fund and retire our debt. Production will be uncertain from year to year, rendering an inability to confidently plan for long and short-term financial stability.
- If adopted, VFDA will be required to amend the SGH Annual Management Plan and submit a significantly revised plan to the Regional Planning Team prior to April 1, 2026.
- VFDA will be forced to adjust its operating model to fit a much lower level of production. Lower returns to SGH may reduce our ability to generate corporate escapement more reliably, especially in years of low ocean survival, and/or reduce our ability to provide for a significant public benefit.
- Operational adjustments would require staff reductions and strand capital infrastructure investments we made to produce pink salmon at current permitted levels previously approved by ADF&G.
- VFDA would likely suspend plans for a new coho rearing facility due to uncertainty regarding future Board actions, eliminating progress toward developing a Chinook sport fishery in Valdez.
- Approximately 65% of VFDA's coho sportfish operating budget is funded through pink salmon cost recovery. All existing and future hatchery infrastructure needs require funding by pink salmon cost recovery revenue.
- Additional requests to reduce hatchery pink salmon, which will certainly be forthcoming if this proposal is adopted, could jeopardize the long-term viability of the coho program.

As stated previously, this proposal is ill- advised and reckless. It is wholly arbitrary and capricious, and offers no measurable standard to determine whether production cuts would improve declining salmon stocks. It will harm VFDA and other Alaska hatchery programs in pursuit of an experiment to try to increase Western Alaska salmon abundance. VFDA respectfully requests that the Board once again **reject** Proposal 170.

**Proposal 171 - 5 AAC 40. XXX New Regulation - Amend Prince William Sound hatchery permits to reduce pink salmon egg take capacity**

VFDA considers straying an area of particular importance and actively works to minimize the loss of economic value to harvesters and decrease interactions with wild salmon. We apply best management practices to reduce opportunity for fish to stray by aggressively prosecuting fisheries on our returns to remove as many hatchery pink salmon from the environment as possible. Hatchery operators have invested nearly \$4.25 million into the Alaska Hatchery Research Project (AHRP) to better understand the effects of hatchery straying. This study is yet to determine the effects of genetic introgression, its significance, and align these findings with sustainable salmon policy.

This non-regulatory proposal calls for unspecified changes in PWS pink salmon hatchery production sufficient to reduce straying into Lower Cook Inlet streams to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan. **However, this proposal provides no specific actions for the Board to consider; therefore rendering any action by the Board as completely arbitrary!**

The author's use of the study, (*Otis et al. 2018. Observations of Pink Salmon hatchery proportions in selected Lower Cook Inlet escapements, 2016-2017*), completely misses the mark to attempt to demonstrate harm. *Otis et al.*, was a pilot study conducted to determine the presence of hatchery strays in Lower Cook Inlet (LCI) streams and nothing more. While the study successfully demonstrated presence and origin of hatchery strays, including those of PWS hatcheries, presence alone is no indication of harm. There are no pink salmon stocks of concern in LCI.

<sup>10</sup> Regional Information Report No. 5J25-02 – ADF&G

Percentages can be misleading, particularly when the overall number of samples are low. The study shows no correlation between the numbers of hatchery marks found in streams and the overall escapement in order to estimate true magnitude. As an example from *Otis et al.*, PWS hatchery marks for Humpy Creek in 2017 totaled three fish. Total escapement for Humpy Creek that season was estimated at 71,073 pink salmon. While the percentage of PWS hatchery strays was estimated to be 2.1% in that stream, three fish is hardly enough to create concerns of genetic impacts affecting fitness or run timing. Cumulative percentages from individual PWS hatcheries for the study period ranged from .03 to 10.6%, showing significant variability between hatcheries and all within comparable ranges for wild pink salmon.

AHRP research, using thousands of pink salmon samples, demonstrated an estimated reduction in RSS of 50% in first generation (F1) hybrid crosses. However, new information presented by the department this year shows that RSS improves significantly in the next generation (F2) to as much as 85% in odd year lineage<sup>11</sup>. This is a positive sign of the regenerative nature of pink salmon to reverse maladaptive traits quickly.

The proposal states that high stray rates violate criteria in the *Prince William Sound/Copper River Comprehensive Salmon Plan* specifying that the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of the wild-stock escapement over the long term. Here is what the language in the comprehensive plan states:

From the Executive Summary (emphasis added):

*The PWS/CR RPT recommends that five biological and economic criteria be employed to recognize optimum production as the hatchery program in Prince William Sound is further developed and fine tuned..... (2)the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of the wild-stock escapement over the long term;*

From the report (emphasis added):

*At the present time, the straying rate of hatchery salmon in wild-stock streams is not known. A monitoring program should be implemented to periodically estimate the rate of hatchery-salmon straying into wild-stock streams, and to better define genetic stock boundaries in PWS. If it is determined that the rate of straying is significantly greater than the acceptable threshold of 2%, the PWS/CR RPT will determine whether and to what extent the hatchery program in Prince William Sound should be modified to reduce the rate of straying. The PWS/CR RPT recognizes that the present estimate of the acceptable threshold of hatchery-salmon straying is not well supported. Further research is needed to improve our confidence in the estimate of acceptable hatchery-salmon straying rates. This work must include studies to determine the effect of interbreeding of wild and hatchery salmon on the productivity of wild salmon. Hatchery operational strategies that may minimize straying or the effect of hatchery-salmon straying should also be examined.*

As stated, the 2% stray threshold is a **recommended** biological criterion for consideration during the optimization of hatchery production in PWS, hardly a bright line that PWS hatcheries are in violation of. It is believed this metric came from studies done on coho salmon in the Pacific Northwest, which did not consider that natural pink salmon stray at greater rates (9-50%)<sup>12</sup> or in some studies lower, but certainly not below 2%. Finally, much has been done since 1994 to implement the suggestions made in the plan, such as monitoring to periodically estimate stray rates and address the effects of interbreeding. The department has conducted at least four evaluations of straying, (*Moffit, Brenner et al, 2013, Joyce TL et al, 1999, Sharp et al, 1995 and Sharr et al. 1994*) and the AHRP was established to define genetic stock boundaries and determine the effect of interbreeding of wild and hatchery salmon on the productivity of wild salmon. Much has been learned over the last 40 years and while there is much more to understand, it should be clear to all that containing pink salmon straying to 2% is impossible to achieve. Future evaluations of this phenomena, resulting from millennia of

<sup>11</sup> Second generation fitness consequences of Pink Salmon hatchery-origin strays in Prince William Sound (Shedd et al. 2026)

<sup>12</sup> Sharp et al., 1994



genetic pre disposition, will likely result in the establishment of much higher guidelines going forward. VFDA respectfully requests that you **reject** Proposal 171.

**Proposal 172- 5 AAC 40.XXX New Regulation - Board generated regulation that places a moratorium on pink and chum hatchery production**

VFDA opposes any Board generated regulation imposing a moratorium on hatchery-produced pink and chum salmon. We strongly question whether the Board has authority to condition hatchery permits or preempt the Commissioner's statutory role and that of the Regional Planning Teams as specified in 5AAC 40.340.

We have strong concerns that any moratorium will remain in perpetuity and result in a de facto cap on production, even when reasonable and justifiable considerations should be made. Given the scientific complexity surrounding hatchery-wild interactions, complete certainty may never be resolved. It remains unclear what arbitrary standard would be required to lift such a moratorium.

There remains a great deal of misunderstanding surrounding Alaska's hatchery programs. Many feel that hatchery production is on a steadily upward trajectory, when in fact it is stable with many hatchery programs at full capacity. Regions like LCI are not even meeting current production goals and may never. Little if any increase should be expected in future years. However, small program adjustments must be allowed to balance allocations between gear groups, or adjust species production for program sustainability.

The hatchery associations have honored an understanding with Commissioner Vincent-Lang referenced as RC240. We value the need to resolve existing questions regarding hatchery/wild interactions. The Commissioner should be the one to determine this matter before the board using a case-by-case basis where appropriate. If a new commissioner also decides to pause the approval of permit alterations until those questions can be answered VFDA will honor that as well. But codifying a moratorium in regulation is wrong, outside the Boards authority, and sidesteps the science and process intended by the legislature. We respectfully request that you **reject** Proposal 172.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals. **We would respectfully request the board reject Proposals 170,171, and 172.** Thank you for your consideration.

Sincerely,



Mike H. Wells  
Executive Director

**Submitted by:** Benjamin Van Alen

**Community of Residence:** Juneau, Alaska

The Board of Fisheries should deliberate and vote on Proposals 170, 171, and 172 at this March 17-20, 2026 “Statewide Finfish and Supplemental Issues” meeting. These three proposals seek to restrict hatchery egg takes. I strongly support these and any proposals that seek to constrain the adverse ecological consequences of production hatchery releases.

I encourage Board members to understand that for hatchery releases to have an economic benefit they must have an ecological benefit. I encourage Board members and all fisheries participants to read the open access article titled “Hatchery Salmon and Ecological Overshoot” (<https://doi.org/10.1002/aff.2.70103>). (attached below)

I am unable to find an ecological niche for ‘ocean ranched’ hatchery salmon and I encourage others to openly question and respond to this topic too. I strongly support having this subject deliberated in the Board of Fisheries open public process. The Commissioner of Fish and Game and Fish and Game staff will benefit and hopefully respond to questions and concerns from the Board of Fisheries.

see attached publication

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Rod Van Saun, and I am a resident of Ninilchik, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. This attempt to limit or shut down hatcheries is foolish. There is zero science to support or justify such extreme action.

These proposals would absolutely hurt my family and hurt thousands of Alaskans who depend on these fish for sport fishing, dip netting, and commercial fishing. Our area depends heavily on strong salmon returns. It would negatively affect people's ability to even live here.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Rod Van Saun  
Ninilchik, Alaska



Chairman and Members of the Board of Fisheries,

My name is Teague Vanek. I have drift fished for salmon in Cook Inlet every year except for two seasons since I was 12 years old. That's 47 years of fishing. For many years, the average escapement into the Kenai River was just over 700,000 sockeye and the average commercial harvest for Cook Inlet was 5.2 million sockeye. During that time, the drift fleet fished inlet wide two days a week with additional time when escapements allowed for it. That was considered a balanced and conservative way of allowing a good harvest and providing for passage of fish through the Central District. With that level of fishing, there was never a conservation concern for coho in the Northern District, and sport fishing in Northern streams was largely left open. Commercial harvest rates for coho were still very low and combined commercial and sport harvest stayed well below the acceptable 70% rate.

Then the restrictions on the commercial fleet started happening. Bit by bit the inlet got chopped up into ever smaller areas and "sections" which are extremely difficult to fish because of the large tides in Cook Inlet. Then, one by one the little areas have been given regulated closures until we've been nearly shut out of most of the productive fishing places. The result has been that instead of an average harvest of 5.2 million sockeye, we call 3 million harvest a big season, and escapements into the Kenai and Kasilof Rivers are regularly three or more times what is needed. Our harvest rate of cohos used to be 10%-12% at best, now it's only 1%-3% of the total run. Why is it that the drift fleet needs to be so completely shut out of the harvest?

Now, you have Proposal 186 (which is allocative and shouldn't have been taken up out of cycle) that asks for a complete closure of one of the few remaining productive fishing areas after July 15th, when the best fishing occurs. With the drift fleet's already extremely low harvest rate of 1%-3% of coho salmon, the resulting degradation of our fishery is simply not worth it.

Some people think that the sockeye not caught by closing the middle of the inlet can instead be caught in the corridors nearer to shore. It's simply not true. Just look at recent years where we've been given back-to-back, day-after-day fishing in the corridor and still have had tremendous grossly over escaped rivers of wasted sockeye.

Please reject Proposal 186. Not just because it was improperly taken up out of cycle, but also because of the needless harm it would impose on the commercial fishery and the very small gain you would get by further restricting a fishery with only a 1%-3% harvest rate on coho salmon.

Teague Vanek

**Submitted by:** Steve Vican

**Community of Residence:** Cordova

As a year round cordova resident ,area e drift gilnetter,and father of five, I ask that you please not accept props. 170,171,172. I cannot stress enough about how much our hatcheries mean to us residents of P.W.S. . Something like this would really put the screws to our fractured and dying economy. These hatcheries make up 75% of my income. Its not just that these props. not only erode our economy and lively hood, they lack in a proven factual scientific base. Thank you for your time and service , with respect, Steve Vican

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**Submitted by:** Steven Vincent

**Community of Residence:** Soldotna

163, 164, 165. I adamantly request that the BOF vote for the cessation of all Botton Trawling in State Waters. Bottom Trawling (and mid-water trawling when in contact with the sea floor)“rototills” the sea floor causing irreparable damage and releasing substantial amounts of carbon dioxide.

A vote for the cessation of bottom trawling is a positive vote for the future of our Alaskan fisheries and the people of our great state.

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**Submitted by:** Garret Vincentz

**Community of Residence:** Ketchikan, Alaska

I am asking the Board of Fish to OPPOSE proposals 170, 171, and 172. My name is Garret Vincentz and I am a commercial fisherman based in southern Southeast Alaska. I have been a resident of the state for 15 years and have been fishing in Alaska for my entire adult life after graduation from college with a bachelor’s degree in fisheries and aquaculture. I currently am a board member for Southern Southeast Regional Aquaculture Association (SSRAA) as well as Southeast Alaska Seiners (SEAS), however I will be submitting my comments solely on behalf of myself.

I have listened to and participated in many BOF meetings since becoming a limited entry permit holder and I have noticed, particularly in the last several board cycles and regardless of the meeting location, that the subject of hatchery implications upon our wild stocks and natural environment has become a hotter topic over the course of time. It has been revisited around the state, with the typical responses coming from both sides of the argument. To keep my comments concise, I will skip the immense fiscal, socioeconomic and cultural benefits that hatcheries provide to the people of the state of Alaska and citizens of the United States of America, as you have heard those positions from voices all around Alaska. With this said I was alarmed by the Board of Fish’s close decisions with regards to hatchery proposals at its most recent Southeast Alaska meeting in Ketchikan, despite overwhelming public support for hatchery production in our region.

A slow accumulation of scientific data, that quite honestly is clear as mud with respect to hatchery salmonids effect on wild stocks, has come forward as the question of hatchery effects has come more into focus. I would point out that it would appear to take many, many decades of data to account for variations in the inshore and offshore environments that have in modern times fluctuated greatly with high frequency. Simply put, it may take too long to scientifically access the answer to the hatchery impact debate accurately. While these studies have resulted in very good observations and information it would be and is impossible to quantify any of them as scientific law, regardless of where the publisher stands on the hatchery issue.

From a 10,000 ft view I ask the board to consider what the real implications to our coastal resources are, should hatchery releases be curtailed. I ask you to recognize that the state decided long ago how, where, and to what degree hatcheries would become entwined in our natural world. While we debate how much is too much, the entire food web of the north pacific has evolved to cope with what humans have implemented. That food web is reliant on hatchery produced salmon at this point in humanity, whether we like it or not. If a decision to cut hatchery production is ever implemented, it should be done with extreme caution. We all know the benefits that have come from hatchery produced salmon for many species on this planet including humans. What we don't know is what the ripple effects will be should humans take that production away. From an ecological standpoint I fear that there is a strong argument to be made that we may have come too far to go back now.

In summary I hope that your decision to OPPOSE hatchery production cuts and curtailment at the statewide level settles this redundant issue that the Board of Fish has been forced to revisit time and time again, albeit with the same decision and precedent repeatedly.

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**PC490**

**Submitted by:** Michael Walsh

**Community of Residence:** Juneau

Oppose proposition 170, 171, and 172

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**PC491**

**Submitted by:** Daniel Warta

**Community of Residence:** Palmer

I am writing in support of PROPOSAL 186 – 5 AAC 21.353.

I have lived in Alaska for my entire life (29 years) and have fished the valley rivers for as long as I have been old enough to hold a fishing pole. As a young kid, bait day on the Little Su was always a date I excitedly looked forward to. We would get up at 3AM in the morning to drive out to the Little Su, where my 7 siblings and I were all but guaranteed a limit of cohos. These fish would go directly into our freezer, not only making lifetime memories but also providing a significant source of food for our large family. Because of how abundant coho salmon were and how aggressively they attacked, fishing for them was the perfect way to introduce a young Alaskan to salmon fishing.

Today, I have nieces and nephews that are around the same age I was when I started fishing for cohos. I would love to introduce them to salmon fishing the same way I was, but it no longer seems practical. It is hard to plan on bait day because of the unreliable runs, and even if it does remain open the ethics of fishing seems questionable due to the depleted coho numbers by the time they reach the river.

I understand that the state wants to maximize harvest when sockeye salmon are in abundance, but this is coming at the cost to the rivers and the people in the Matsu valley. I have no issue with the commercial harvest of surplus sockeye, but this should not come at the cost of local residents and their ability to stock their freezers. I realize that coho in the valley is primarily considered a sport fishery, but to Matsu valley residents it is so much more.

Please consider approving Proposal 186 to give the Matsu coho run a chance. Thank you.

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**Submitted by:** Luke Warta

**Community of Residence:** Anchorage

I am writing in support of proposal 186. I have been sport fishing for coho salmon since the age of 3 or 4, and it has been instrumental in developing my love of fishing and out door recreation. I consider it one of the best entry points for younger anglers due to its aggressive strikes making it easy to hook, reasonable size making it challenging yet manageable to land, and providing excellent table fare unlike most stocked fish. Its importance has only increased with the collapse of the chinook fishery, and while I have nothing against commercial fishers benefitting from the recent exceptional sockeye runs, I consider it paramount that we protect the coho runs to the best of our ability.

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I am a lifelong Alaskan, currently living in Anchorage. I have witnessed the consistent decline of our salmon fisheries in the Susitna and Knik arm drainages, both Kings and Coho. I urge the board to uphold the state's duty to provide for **sustained** yield and to hold our resources in common for future years and generations.

I strongly support Proposal 186. 5AAC 39.220, the policy for the management of mixed stock salmon fisheries states "*In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with the sustained yield shall be accorded the highest priority*". Northern district coho have greatly declined. The last fully enumerated run to achieve the low end of the little Susitna River's escapement goal was 2021, and the last year that the Deshka river achieved its low end was 2019. Additionally, all of the last three years the Little Susitna River and Deshka River have been closed to coho salmon sport fishing prematurely.

The Alaska Department of Fish and Game has consistently argued that it is not possible to manage Cook Inlet coho in the mixed stock fishery with in-season data, citing variable run timing and lack of in-season data. This has been seen consistently throughout recent history, with northern district streams being targeted by in-season restrictions that cripple the coho fishery, while the Central District drift fleet harvests large numbers of coho. Some years the in-river fisheries have been restricted within days of the Central District drift fleet harvesting tens of thousands of northern bound Coho. Again and again, we have seen that it is not possible to manage this mixed stock fishery in season.

This bad situation was made significantly worse by the Kenai River late run King Salmon Stock of Concern Management plan, which forced the central district drift fisheries off shore and shut down the much more selective set net fishery. The Central District drift fishery harvests far more northern bound salmon than the East-Side set net fishery, especially seen in the relative harvest of Coho salmon. Bringing the Central District drift fleet closer to shore will help with this issue, while allowing for harvest of Kenai and Kasilof Sockeye and not endangering the Kenai Kings.

Ultimately, it is imperative that the board strengthen the conservation corridor, that area east of the Kenai and Kasilof extended area, to protect a fishery that the department is unable to manage in season. To allow the Central drift fleet to harvest northern stocks indiscriminately in their quest to harvest Kenai and Kasilof fish is a betrayal of our State's duty to protect both sustainability and common use. If more time in a smaller area is necessary to harvest the Kenai and Kasilof sockeye, that is an appropriate goal, but to allow the fleet to fish in an area known to contain a higher proportion of mixed stocks is irresponsible.

I strongly support proposals 179 and 180. I submitted proposal 179 to help protect our King Salmon stocks across the state. There is currently no statewide annual limit, allowing for



exploitation of a species without a harvestable surplus. King Salmon continue to dwindle across the state, and there are significant areas not covered by any annual limit.

The most common objection to my proposal has been that the fish that we kill *might* not be “ours”. This is a pathetic reason to indiscriminately harvest a species that is struggling across the Pacific Northwest. Due to difficulties in funding and research, we have limited, if any, information regarding the origin of the fish harvested in many of our marine fisheries. Proposals 179 and 180 would force the marine sport fisheries to also share the burden of conservation, and protect King Salmon stocks across Alaska, and the broader Pacific Northwest.

I submitted proposal 182 to expand the use of archery tackle for species that there are not conservation concerns for. Archery is a unique, fun, and selective method of targeting specific species. Additionally, it would allow for immediate targeting of new invasive species if they were to appear, while not significantly endangering vulnerable native species.

**Submitted by:** Mike Webber

**Community of Residence:** Cordova

My name is Mike Webber. I am of Tlingit, Eyak and Sugpiaq heritages. I am a Kalaikh Kaagkwaantaan Yedi. My Tlingit name is "Kaeiaou". This name means a new beginning. That name was given to me during a potlatch of my Tlingit grandfather with family members from Cordova and Yakutat. On my father side, he is Tlingit and Eyak. His family went from Eyak (Cordova), Katella, to the Kaliakh River to Yakutat. He was raised in village of Katella until he was 7 Years old. That village has been abandoned shortly after he left as a child.

The Kaliakh river is my traditional families river for over 1,000's of years. When I said the clans name "Kaliakh Kaagkwaantaan", that give you a destination of where I am from traditionally. It is also known as Galyax Kwaan area, the Eyak peoples name for that river.

My family still fishes that river. My son Teague Webber has been fishing that river since he was 5 years old and now is 12 years old. He knows that this is our traditional families river and looks forward to go fishing there spiritually and physically. I have been commercial set netting that river for 9 years straight. My dads brother Jim Webber commercially fished that river in the 50's and 60's. My grandmother has also fished that but is a different setting. Meaning, she as a young girl fished there traditionally for the riches and wealth from the food they caught. This tradition has been happening for ever.

Back in the day, rivers were given to different families by leaders or chiefs of the village. Village family members would go to their own river to get their traditional foods salmon, seals, bears, medicines berries and what ever else what was in the chosen area for that family. This way, they would not have to compete with other village members. When summer and fall was over, all the different families would move from there chosen rivers and haul their foods and medicine back to the main village to live together in the winters and spring times. This still happens today in my mind, I go back to the Kaliakh to fish that river to get my riches in food and to make a living in commercial setnet fishing. I fish that river because its in my blood, in my families blood. My ancestors are their, I feel their presents when I am their and I thank them for what they created for me. My ancestor guide me in the 130 mile one way trip to get to the Kaliakh river. They help guide me into the 100 foot wide ocean bar entrance when I come and go. I ask for their guidance and thank them. My ancestors are my gods, I pray to them. My ancestors are buried from Eyak (Cordova) all the way to Yakutat. I was gifted the knowledge of the "Lost Coast" and I use that knowledge for safe guidance. The Kaliakh River has been gifted to my family from the great chiefs 1,000's of years ago. Its a true gift to me.

In the last 5 years, the Tsiu river is the only River moving to the east, rest of the rivers are moving to the west on the North gulf coast. In 2025, the Tsiu river ran into the Kaliakh River very close to the mouth the river. In my mind, I do not believe the rivers will run into each for much longer, feeling the Tsiu will relocate its self to the east again like before.

For 25 years, I ran freight to 3 out of 4 sport fishing lodges. Items like fuel, building supplies, septic systems, windows and doors to build their lodges. I worked with them, we communicate with the guides to try and avoid any possible conflicts. But one lodge stood out, they alone has raised havoc with us commercial set netters from the beginning. They do not communicate with us and now they put in a proposal to tell us where to fish and not to fish. As a Alaska Native commercial fishermen from my traditional river, I strongly disagree with that lodge and in my hope to see their proposal turned down by the Board of Fish. My families will continue to fish this river as I do, its a gift from our ancestors and its up to us to protect it when it is needed.

My family and ancestors have been fishermen for thousands of years. We know where to fish, where to put our nets. We look for deep water, deep water on the Kaliakh is only 3-8 ft depending on tide. That deep water has always been the best area to fish historically.

Now the Tsiu river relocated its mouth into that deep water area of the Kaliakh. Proposal 187 wants to close 1/2 mile of the Kaliakh river effectively eliminating all commercial fishing opportunity on both rivers. As

commercial fisherman, we need to adapt daily to ever changing river conditions. But one thing stays the same the deep water is always in the same spot. Above, below and around the confluence. This is where we need to fish and the same spot that was fished by my ancestors.

The in river escapement has never been behind, even early in the Coho season. The late season escapement is always way more than need in the Tsiu river. The sports fish catch has been almost identical in the last decade. So why is that one lodge raising a stink when there is enough fish for everyone. This is what we are dealing with. Vote down that one lodges proposal. That proposal does not hold ground to anything.

Mike Webber

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**Western Interior Alaska and Eastern Interior Alaska  
Subsistence Regional Advisory Councils**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To  
OSM.R26002

January 20 2026

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

We write to you on behalf of the Western Interior Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Alaska Peninsula/Aleutian Island/Chignik and Statewide Finfish Meetings.

The Councils represent subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Interior Alaska. They were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charters establishes the Councils' authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Councils also review resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Councils. The Councils provide public forums for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within their regions.

The Councils held a joint public meeting October 17, 2025, in Fairbanks and voted to submit the following comments.

*Alaska Peninsula/Aleutian Island/Chignik Meeting*

The Councils **support proposals 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, and 148**. These proposals seek to implement Chinook and Chum salmon savings measures in commercial fisheries that intercept Arctic-Yukon-Kuskokwim bound salmon. Escapement goals for Chinook and fall Chum salmon are not being met on the Yukon River. Yukon River salmon stocks need to be protected across their entire range, not just in-river, or else we risk losing these stocks forever. Every

salmon counts in an effort to rebuild runs. Subsistence fishers have been long been bearing the burden of conservation, and the subsistence priority is not being upheld. These proposals will help distribute a small amount of that burden by reducing interception in commercial fisheries.

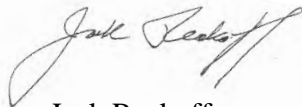
Statewide Meeting

The Councils **support proposals 163, 164, and 165**. Efforts to better regulate trawl fisheries are long overdue. These proposals will do that by helping to clarify definitions, setting standards for monitoring, reducing bottom contact and subsequent habitat destruction, and requiring the use salmon excluders as is done in other fisheries to reduce salmon bycatch.

The Councils **support proposals 170 and 172** that seek to reduce egg take and overall hatchery production. A growing body of scientific evidence shows that hatchery salmon compete with wild salmon for resources and impact the diet, growth, fecundity, productivity, and abundance of wild salmon and other species in the marine environment. The State of Alaska needs to reduce hatchery production so that our struggling wild salmon stocks have a better chance at health and survival. Not only does this need to be done domestically, but State and Federal governments must also collaborate with other nations to reduce international hatchery production throughout the north Pacific Ocean.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our respective Subsistence Council Coordinators: Brooke McDavid (Eastern Interior), at (907) 891-9181 or brooke\_mc david@ios.doi.gov or Nissa Pilcher (Western Interior), at (907) 891-9054 or nissa\_pilcher@ios.doi.gov.

Sincerely,



Jack Reakoff  
Chair, Western Interior



Robert "Charlie" Wright, Sr.  
Chair, Eastern Interior

cc: Federal Subsistence Board  
Western Interior Alaska Subsistence Regional Advisory Council  
Eastern Interior Alaska Subsistence Regional Advisory Council  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and  
Game  
Administrative Record

**Submitted by:** Chris Westphal

**Community of Residence:** Meadow Lakes

My submission is in respect to trawling. Trawling is destroying our fisheries, and the seabed ecosystem. The term "bycatch" needs to be replaced to WANTON WASTE. The amount of fish that is destroyed while targeting pollock is criminal to say the least. This type of fishing is not sustainable in any fashion and has been banned in many other parts of our country. We are not allowed to catch even one single King salmon where I live and have not been allowed for years. Trawling needs to stop in ALL Alaskan waters, state and federal. PERIOD. No mid water OR bottom trawling. It will take decades for mother nature to repair the damage that has already been done. Thank you for reading this. All I want is for my Grandchildren to have a chance to fish and their children to be able to fish. perhaps potfishing for pollock is the answer. Trawling must be banned.

**Submitted by:** Taylor White

**Community of Residence:** Sitka

I respectfully submit the following comments regarding Proposals 163, 164, and 165 addressing groundfish trawling in Alaska state waters. I support all three.

Bottom-contact trawling is a fishing method that disturbs and alters the structure of seafloor habitats. Complex seafloor habitats are essential for juvenile groundfish, forage species, and invertebrates, as they offer shelter, feeding grounds, and settlement sites for new individuals. Repeated trawling simplifies these habitats and favors disturbance-tolerant species.

When large-scale habitat complexity is reduced, ecosystem functions may be altered in ways difficult to reverse. Therefore, management considerations must extend beyond stock status alone. Even if target biomass levels remain within regulatory thresholds, habitat degradation can undermine future productivity and ecosystem resilience. The incentive structure of trawling, which maximizes bottom contact for catch efficiency, creates inherent tension between economic optimization and habitat conservation, as well as challenges for compliance and enforcement.

Testimony from the North Pacific Fishery Management Council and the trawl fleet indicates that gear labeled as pelagic trawl frequently contacts the seafloor, sometimes between 40 and 100 percent of the time. This underscores the difficulty of distinguishing between pelagic and bottom trawling impacts in the absence of clear and enforceable regulations.

It is essential to establish enforceable limits on seafloor contact and ensure transparent monitoring. Clear regulations, reliable data on gear usage, and robust monitoring systems are necessary to ensure compliance. Without these measures, the regulations may fail to provide effective environmental protection.

Salmon excluder devices should also be required and closely monitored to help protect commercial salmon species, which are vital to Alaska's economy and coastal communities.

Given that Alaska fisheries management adheres to the precautionary principle, I urge the Board to prohibit bottom-contact groundfish trawling in state waters. At a minimum, any authorized trawl activity should include enforceable seafloor contact limits, transparent monitoring, and robust bycatch reduction measures.

Thank you for considering these comments.

**Submitted by:** Clifford Williams

**Community of Residence:** Yakutat Alaska

I do subsistence fishing every year for our family and elders and for the community of Yakutat and if you take it away from us it would not be fair to the community of Yakutat because we live off our land and if you give it to the sports fishermen and let them take what they want and let them take our king salmon away from us even that is not fair

**Submitted by:** Anitra Winkler

**Community of Residence:** Kodiak

Board of fish members,

My name is Anitra Winkler. I am a lifelong Alaskan and Kodiak fisherman. I am writing to voice my support for proposal 167. I have been fishing around Kodiak since 2010 and while I've only participated in the jig fishery the past three seasons the recent issues with cheating in the fishery is very obvious. Jigging is the last open fishery and is great opportunity for young fisherman as you don't need to buy an expensive permit, gear overhead is manageable, and you can do it with minimal crew and a wide variety of boats. I believe it is critical to protect this fishery for younger/new entrants and a great start would be to have more clear regulation on what gear is allowable. The critical thing that needs to be achieved is that cod sold as jig cod is caught on a jig machine not with other gear types I.e. longlines or pots.

**Submitted by:** Philip Winrod

**Community of Residence:** Thorne Bay

I oppose proposals 170, 171, and 172.

A lot of science has gone in to where we are now. The system works and supports a lot of biodiversity. Let's work together and find a better solution before cutting production.

**Submitted by:** Robert Wolfe

**Community of Residence:** Girdwood

My name is Robert Wolfe and this will be my 46th year in the Cook Inlet Salmon Fishery. I drift gill net and am based out of Homer where I have a Direct Market. I process and sell my fresh, frozen and smoked catch to locals and tourists.

I oppose proposal 186. it is based on faulty and misleading information.

The question asks; What is the issue you would like the Board to address and why?

Response:" Since the federal EEZ drift gill net fishery has started, allowing 200 fathoms(1,200') of gill net per drift permit holder...

I must stop here and correct for the record that: The law allows 150 fathoms(900') of gill net per Upper Cook Inlet Drift CFEC permit not 200 fathoms.

For over a decade regulations passed by the BOF for conservation and economic efficiency have allowed the Stacking of permits, two permits are allowed on one vessel. The regulation only allows 50 fathoms(300') of extra

gill net on that vessel for a total of 200 fathoms. Any 200 fathom drift net fishing in Cook Inlet is a reduction of 600' of gill net from the fishery. It's nothing new and is an actual conservation mechanism for the fishery.

In response to ACR 5 Staff finds there is no fishery conservation or reason for this out of cycle proposal. Staff does not find error in regulations and Staff finds no unforeseen effects from when the Stacking permits was adopted. The use of 200 fathom nets has been in practice for over a decade, even in "EEZ" and is not proven to be the recent cause of any low escapement numbers of Northern bound Coho.

Staff : "Both the Dëshka and Little Susitna river Coho salmon weirs have experienced flooding or early ending of the project due to funding. Because of that, these counts are considered minimum or incomplete estimate of Coho salmon in river abundance. Dëshka River Coho salmon weir counts have been incomplete each year since 2020. Little Susitna River Coho salmon weir counts have been incomplete since 2022. Fall weather and high water make consistent operations these weirs difficult. Despite incomplete counts the most recent seasons have been generally categorized as low abundance for Coho in the Dëshka and Little Susitna rivers." I will point out the 2024 Coho numbers were well below normal STATEWIDE. Not very good science to use implementing a permanent restrictive measure in a fishery that experienced historic over escapements last season.

This proposal attempts to implement several new restrictive regulations out of cycle based on a faulty understanding of stacking permits and uses the "new" EEZ fishery management as an excuse to close more area without any science to back it up.

The author highlights the management shift of more harvest to State waters is suspect for the decline. The statement "harvest in State waters offshore" is miss-leading. Harvest happens in select areas most of which are inshore close to the rivers in the northeastern area.(expanded Kenai and Kasilof corridors and Area 1) Today the fleet is congested into these smaller areas closer to the Mat-Su. When the mixed stock are harvested in a smaller areas up north the likelihood of excessive harvest of north bound Coho might increase but there is a lack of scientific data.

To us Cook Inlet Drift fishers, offshore is the Middle rip. This Geo-physical feature stretches from the Anchor Point line to north of Nikiski. This tidal feature is the main migration route for the Cook Inlet Salmon run and our most productive water. Years ago with Inlet wide openings the fleet would be stretched for 50 miles along this thin strip of tide rips from Kenai to Anchor Point spreading out the harvest area of this mixed stock run. This spreading out of the fleet helped keep the fleet from targeting any one specific area/stock on any given day. Putting the fleet in a concentrated area in the norther inlet for the majority of the seasons harvest has effectively put more pressure on north bound Coho.

Mixed stocks swim together and do not magically separate at a specific spot. Salmon do not recognize boundary lines drawn on a map. Tides and wind have the greatest impact on fish movement and patterns. North bound Cohos will be harvested alongside Sockeyes no matter what area is fished. More will be harvested the closer the fleet comes to the parent river.

In all reality we need more time in the very area proposed to be closed in able to harvest the surplus available in most runs. This is especially true for the EEZ waters farther from the Northern District, Kasilof and Kenai rivers.

This Board of Fish should not restrict more time in Area 1. Present management resulted in a waste of \$ 50 million last year alone by causing twice the escapement as the Exxon Valdez Disaster.

This Board needs to allow for more time in Area 1 to avoid another blowout over escapement year and massive waste of the surplus resource. With another excellent forecast let's put the money from millions of surplus fish into the bank accounts and communities of Cook Inlet instead of letting 5 million fish rot in river.

I oppose proposal 186 and encourage you to educate yourselves on the enormous failure that is present Cook Inlet Salmon Management and reflect on how badly it has damaged people and our communities. You are the stewards of the resource and with all due respect this fishery is not being managed well.

Thank You for your time.

Bob Wolfe



March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Kyle Woolever, and I live in Kodiak, Alaska. I am a community member who works in conjunction with local hatcheries and an avid fisherman. I am commenting on behalf of myself and the Kodiak fishing community I am part of.

If Proposals 170–172 are enacted, they will directly affect my family’s ability to maintain a stable household income. Our livelihood depends on the direct employment supported by current production costs. A 25% increase in the cost per unit would significantly reduce the funds available to support my position as well as those of my coworkers in essential support roles. If these proposals pass, the resulting financial strain may eliminate the primary income our family relies on. Unfortunately, this would likely force us to leave our newly established residency in Kodiak, as we would no longer be able to sustain living here without that primary source of employment.

Coming to Kodiak, I quickly came to understand how essential hatcheries are to the livelihood of the local fishing community and to Alaska as a whole. Hatcheries play a critical role in maintaining the economic stability of what is effectively Alaska’s second-largest export. Their operation supports not only fishermen, but also processors, suppliers, service industries, and the many families whose income depends on this broader economic ecosystem. When discussions arise about reducing, restricting, or effectively “hog-tying” hatchery operations—as these proposals would do—it is important to recognize what that truly means. These measures set the stage for the long-term dismantling of Alaska’s hatchery system, despite little to no scientific evidence justifying such drastic action, and often relying on selective or misinterpreted data. Hatcheries were originally established to prevent the complete collapse of fisheries, and they succeeded. They continue to provide stability during years of low wild returns, helping protect both the fishing resource and the communities that rely on it. Undermining hatcheries now jeopardizes decades of progress, and threatens both economic and ecological stability across the region.

By passing any of these proposals, you cast doubt upon more than 70 years of adaptive management strategies employed by ADF&G and the scientific foundations that support Alaska’s fisheries decisions. Alaska’s fisheries have long been recognized globally as some of the best-managed fisheries in the world, a reputation built on rigorous science, continuous monitoring, and evidence-based decision-making. Implementing arbitrary reductions such as those outlined in these proposals would represent a troubling shift away from science-driven management toward emotion-based policy. This not only undermines the integrity of the

management system but also risks destabilizing a framework that has proven effective for decades in sustaining fish populations, supporting commercial and subsistence harvesters, and protecting Alaska's broader economic and ecological interests.

By preemptively passing these proposals, there would be a clear disregard for the scientific method and for the ongoing data collection that is essential to responsible fisheries management. Instead, such action would signal a willingness to rely on a shortcut driven by oversimplified assumptions and pressure rather than evidence-based analysis. Our leadership should inspire public confidence by demonstrating that their decisions are grounded in sound, verifiable facts, not spur-of-the-moment reactions. Anything less shifts the burden onto regional planning teams, who would be left to clean up the consequences of decisions made without due diligence.

Recent fluctuations and declines in wild salmon returns across the state are not the result of Alaska's hatchery programs, which have operated at stable production levels for roughly 50 years. If these proposals rely on the logic of correlation without causation, then one could just as easily argue—incorrectly—that the strong rebound in many wild stocks shortly after hatcheries were first established must mean hatcheries caused those increases. That, of course, would be an equally flawed conclusion. When attempting to understand why something is occurring, the responsible approach is to examine what has actually changed, not to impose causation based on the loudest voice or the most politically charged narrative. Ocean conditions, climate variability, predation shifts, and large-scale environmental changes have all been widely recognized as major drivers of salmon survival, far more than long-established hatchery outputs. To blame hatcheries—without credible scientific evidence and despite decades of stable production levels—misdirects attention away from the true variables affecting wild returns.

By entertaining the hypotheses promoted by anti-hatchery advocates, we risk making a far greater ecological gamble than many realize. Alaska's non-profit hatcheries may soon be one of the only tools capable of restoring declining wild stocks across the state. As environmental pressures intensify—changing ocean conditions, shifting predator dynamics, and climate-driven variability—the importance of maintaining the technical expertise, infrastructure, and capacity that hatcheries provide becomes even more critical. If hatchery production is reduced or effectively “hog-tied,” we risk losing the very knowledge base and operational capability that will be essential when the current anti-hatchery hypothesis is ultimately proven wrong. Once that institutional and biological expertise is lost, it cannot simply be recreated overnight. Dismantling or weakening hatchery programs now would leave Alaska without one of its last remaining safety nets—a proven tool that has supported the stability of fisheries for decades and may be indispensable for rebuilding future wild stocks.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G).

Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Kyle Woolever  
Kodiak, Alaska



**Submitted by:** Max Worhatch

**Community of Residence:** Petersburg, AK

I am opposed to Proposals 170, 171,172. These proposals are beyond the scope and responsibility of the Board of Fisheries, as there is currently a public process in place for this very purpose. Enhanced salmon are vital to coastal communities, as they provide economic benefits to both the commercial and sport sectors, as well as subsistence opportunity.

Proposal 170 would have a direct detrimental impact on my business. A 25% reduction in chum production would impact hundreds of commercial fishing families, regional and PNP employee families, and processing employee families. These families are the foundation of our communities. They put kids in our schools, volunteer for service to these communities, sit on our borough assemblies, and sit on our local Advisory Committees.

Proposal 171 while I cannot say that this proposal would impact my operations or the community I live in, this proposal would impact others within the region of the proposed actions. For that reason alone, I would oppose, but if adopted, this would give what I consider an unqualified and politically driven board the ability to arbitrarily change permitted releases. The precedent would cause instability to communities and industry, as a slew of proposed changes would likely be brought forth to subsequent meetings.

Proposal 172 This proposal would not necessarily directly impact my livelihood, adoption, again, would set a precedent of hatchery production being permitted in a highly political venue rather than one that is driven by science, knowledge of the subject, and reason.

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Wrangell-St. Elias National Park  
Subsistence Resource Commission

  
Copper Center, AK 99573

February 28, 2026

Chair Märit Carlson-Van Dort  
Board of Fisheries  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Subject: Wrangell-St. Elias Subsistence Resource Commission comments on Board of Fisheries proposals

Dear Chair Carlson-Van Dort:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. It is comprised of local residents who make their living from the land. We appreciate the opportunity to comment on the Statewide Finfish and Supplemental Issues proposals.

**Proposal 162: Support.** There are concerns with paying for commercial services in a subsistence fishery. Subsistence users do not pay someone to take them out to fish because they know how to get out to their fishing areas. Transporters in the subsistence fishery are not regulated and there are concerns about proper enforcement. While the SRC overall supports this proposal, there are concerns that this is a statewide proposal and not targeted at local concerns on the Copper River.

**Proposals 163-165: Support.** These proposals all change the gear to support less destructive trawling. There is concern about scraping the sea bottom and the consequential bycatch. Species get decimated because trawlers are catching them small and young. The trawl fishery needs to be managed and regulated. These proposals are a step in the right direction.

**Proposal 175: Support with modification.** The SRC modified the original proposal to “bag may be constructed of webbing that doesn’t exceed a stretched measurement of 3.5 inches for harvesting salmon.” The SRC appreciates the proposal for supporting Chinook salmon. By returning more Chinook into the rivers by reducing mortality via dipnet, situations like what

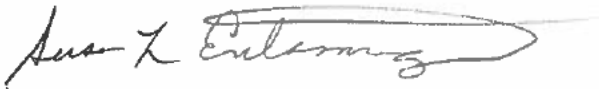
Chair: Susan L. Entsminger; Members: Bruce Ervin, Mercedes Starr Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens. Alternate: Edward GreyBear

happened on the Yukon can be avoided in rivers that still have harvestable Chinook runs, like the Copper River. However, making 3.5 inches for all fish species will impede harvest of other non-salmon species, such as whitefish. If applicable, this proposal should be species specific.

**Proposal 181: Oppose.** The SRC felt this proposal was very ambiguous. If the goal of the Department of Fish and Game is to not allow remote-controlled gear, the proposal should be rewritten to clearly state that prohibition. As it is written now, it is unclear whether fishing methods such as tip-ups would be allowable if this regulation went into effect. Those fishing methods should not be restricted. The SRC encourages the Department of Fish and Game to send in a rewritten proposal aimed at prohibiting remote-controlled gear.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan L. Entsminger". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Susan L. Entsminger  
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Charles Y, and I am a Southeast Alaska salmon harvester. I operate the F/V Cape Caution.

I am writing to urge the Board to reject Proposals 170, 171, and 172. On years when natural runs are not strong, hatcheries provide opportunity to harvesters and processors. They are an important economic buffer for the salmon industry.

These proposals would bring more economic instability for everyone involved in the salmon industry in Southeast Alaska. The reduction or elimination of hatcheries does not only affect the fishers and processors and sport fishermen, but all the allied businesses that support the fleet.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Charles Y  
Southeast Alaska

March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Sergey Yakunin, and I am a commercial fisherman in Prince William Sound, Alaska. Fishing is my one and only source of income. I operate the F/V Silver Storm.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would be devastating. Four out of five hatcheries have not been profitable in the last six years. Any reduction will kill the main season in Prince William Sound.

I am not sure we will survive. With how expensive it is to operate a seiner, we will definitely be in trouble finding crews if production is cut further.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Sergey Yakunin  
Prince William Sound, Alaska







**February 9, 2026**

Ms. Märit Carlson-Van Dort  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: Opposition to Proposal 187**

Dear Chair Carlson-Van Dort and Members of the Board,

I write in strong opposition to Proposal 187.

Yakutat Seafoods purchased gillnet-caught coho salmon harvested from the Tsiu River from 2005 through 2014, averaging more than 40,000 fish annually. During that period, the Tsiu River fishery accounted for over 60 percent of the total salmon volume landed at our plant each year. Despite this level of commercial harvest, the Tsiu River consistently met its established sustainable escapement goal during those years.

According to the Alaska Department of Fish and Game, escapement goals in the Tsiu/Tsivat system have continued to be met through 2025. There has been no demonstrated conservation or biological emergency. Reduced commercial harvest in recent years reflects reduced fishing effort and logistical limitations — not diminished stock productivity or escapement failure.

In 2015, a significant channel shift in the Tsiu River flooded the landing strip used to land DC-3 aircraft for fish transport. As the Board is aware, the Tsiu, Tsivat, and Kaliakh river systems are highly dynamic and have historically shifted channels and altered access conditions. The

cessation of Yakutat Seafoods' purchases from the Tsiu was driven by access constraints, not conservation concerns.

If river conditions shift again and access is restored, we would evaluate resuming purchases and air tendering fish to Yakutat, as was successfully done for many years.

Proposal 187 does not identify:

1. An immediate conservation or biological emergency;
2. A regulatory error or omission; or
3. An unforeseen effect of existing regulation.

The department has successfully managed this terminal system for decades using existing emergency order authority. The commercial set gillnet fishery has functioned as an important inseason management tool, allowing managers to regulate escapement and respond to changing conditions. Eliminating this fishery removes that management tool without proposing any alternative escapement control mechanism.

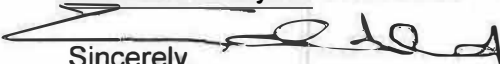
Department reporting indicates that while commercial participation has declined, sport fishing effort in the system has increased. Proposal 187 proposes no corresponding conservation measures or effort adjustments for other user groups. Closing only the commercial fishery assigns the full allocative burden to the resident commercial fleet without addressing total removals across all sectors.

This proposal is allocative in nature. It permanently eliminates a historically sustainable commercial opportunity in a system that has met escapement objectives for decades.

The Tsiu River fishery has long supported resident permit holders from Yakutat and Cordova, including Alaska Native fishermen, and has provided meaningful late-season income stability for small-boat operators. In strong years, Tsiu harvests have represented a substantial portion of the Yakutat Area set gillnet coho portfolio. Removing that opportunity undermines fleet stability and processor viability without conservation justification.

As a 38-year resident of Yakutat with extensive knowledge of this area and its harvest history, I respectfully urge the Board to reject Proposal 187.

Thank you for your consideration.

  
Sincerely,

Greg Inderland

Manager, Yakutat Seafoods

**Yukon-Kuskokwim Delta Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To  
OSM.R26022

February 25 2026

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

I write on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Statewide Finfish Meeting.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their region that may impact subsistence resources critical to communities it serves.

The Council held a meeting January 20-22, 2026, in Bethel and voted to submit the following comments.

**The Council supports Proposals 163, 164, and 165.** Our Council agrees with the other Yukon River Councils that efforts to better regulate trawl fisheries are long overdue. It is important to protect salmon at all their life stages, as well as their marine habitat. These proposals will help clarify definitions, establish monitoring standards, reduce bottom contact and subsequent habitat destruction, and require the use of salmon excluders, an approach already used in other fisheries to reduce salmon bycatch.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Brooke McDavid at

██████████ or ██████████

Sincerely,

A handwritten signature in black ink, appearing to read 'Jacqueline Cleveland', is positioned above the typed name.

Jacqueline Cleveland  
Chair

cc: Federal Subsistence Board  
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game  
Administrative Record

**Submitted by:** Dennis Zadra

**Community of Residence:** Cordova

I would like to show my support for Proposal 162, 163, 164, 165 and 169 as these are common sense. I am adamantly opposed to Proposals 170, 171 and 172 because of the broad consequences these would have across the State and the lack of scientific justification to support them. I am also adamantly opposed to Proposals 186 and 187 because of the extremely allocative issues they bring forward.

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March 2, 2026

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries:

My name is Brian Zwick, and I am a commercial fisherman, local business owner, subsistence user, sport fisherman, and community member in Southeast Alaska. I operate the F/V Kiro under View Alaska LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Our salmon numbers are declining every year due to the impact of extreme overfishing in the trawl fisheries. As small-impact fishermen, we are suffering more every year, and over the last few years, if it were not for the hatcheries and their production of stocks, we would be bankrupt and unable to sustain our way of life and support our families.

These proposals would put an end to commercial salmon fisheries sustainability for all salmon groups. Reducing egg takes will result in fewer stocks, and it will not be sustainable for hatcheries to operate or for fisheries to remain viable.

This will end up shutting down the hatcheries due to lack of funding, and once they shut down, the cost to reopen them is unobtainable. I am deeply concerned about making permanent reductions before the completion of ongoing Alaska hatchery research.

There are sea lion rookeries at hatchery locations that did not exist prior to the hatcheries. If you reduce production or close them down, the impact on wild stocks will be devastating and irreversible.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address.

Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,

Brian Zwick  
Southeast Alaska

