



March 2nd, 2026

Alaska Board of Fisheries
1255 W. 8th 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. 8th 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. 8th 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.

**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 2nd **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.

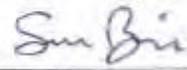
PASSED AND APPROVED THIS 18th DAY OF FEBRUARY 2026





Kristin Smith, Mayor

ATTEST:



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

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.¹ 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.**² Of which, 86% came from the Valdez Fisheries Development Association (VFDA) and the Prince William Sound Aquaculture Corporation (PWSAC) in 2025.³

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.⁴ This salmon further benefits local commerce through the sale of sporting goods, boat rentals, custom processing

¹ Valdez Alaska by the Numbers 2025 – Rain Coast Data

² Valdez Alaska by the Numbers 2025 – Rain Coast Data

³ 2025 Prince William Sound Salmon Season Summary – ADFG

⁴ 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.⁵

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 that reads "Dennis Fleming".

Dennis Fleming
Mayor
City of Valdez

⁵ 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 6th 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

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.

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.

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,

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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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.

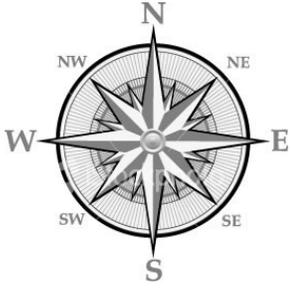
Proposal 187 - OPPOSE

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



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.¹

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.*

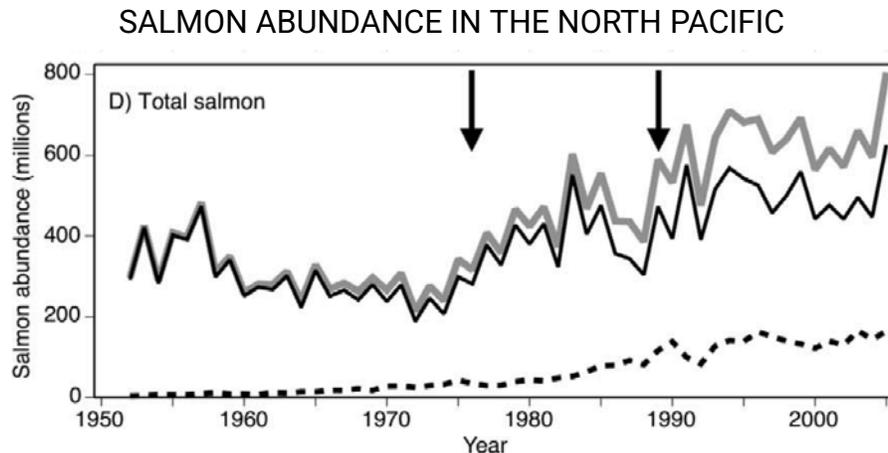


Figure 1. Annual adult abundance (catch plus number of spawners) of wild (solid lines) and hatchery (dashed lines) in the North Pacific. Bold gray line represents total wild + hatchery abundance. Arrows indicate 1976–1977 and 1989 ocean regime shifts.

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.

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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,

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.

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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,

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

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.

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.

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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,

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.

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

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.

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

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

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.

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.

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.

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.

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.

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

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.

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

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 cited 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.

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

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

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.*

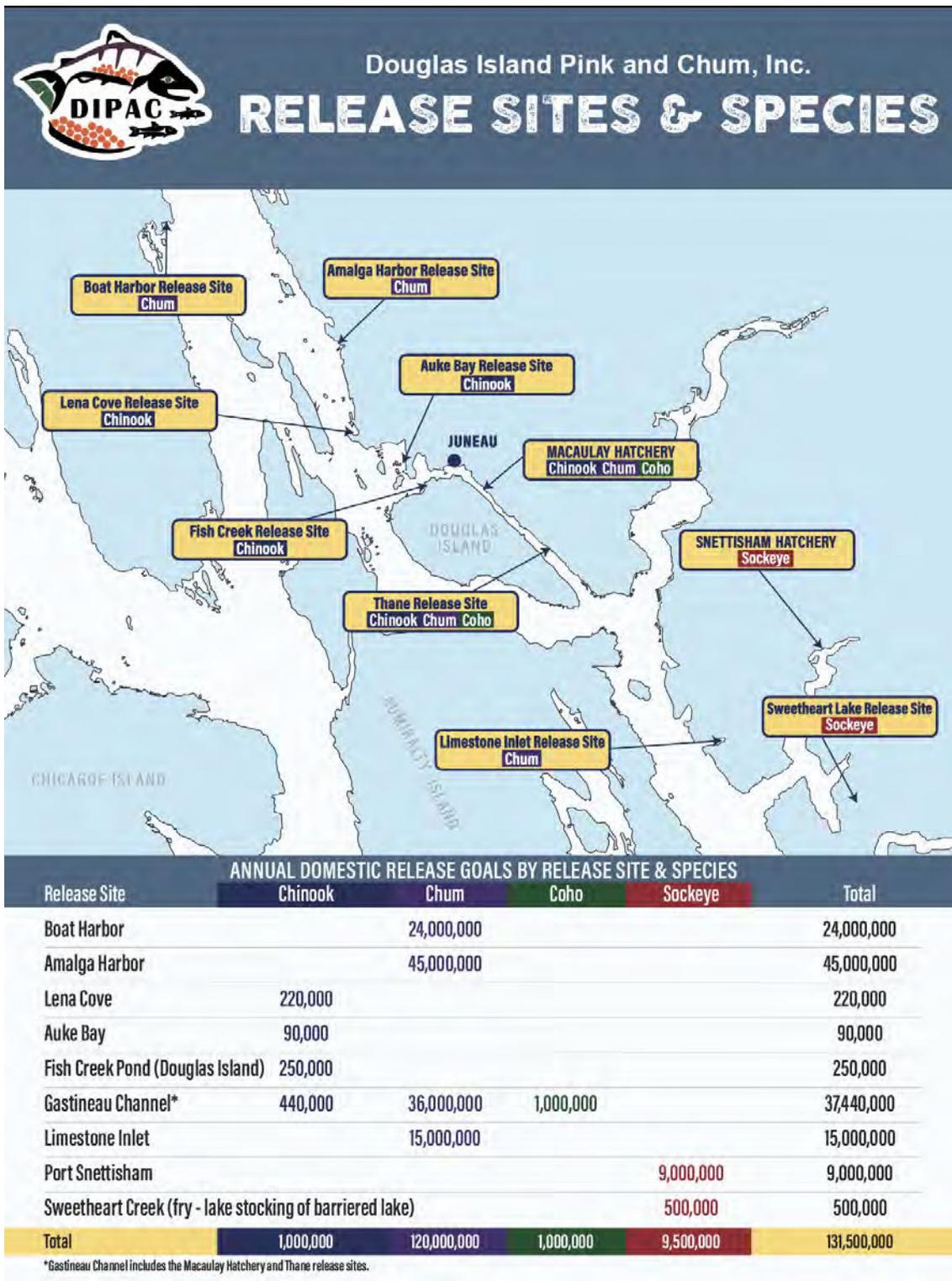


Figure provided by DIPAC: Numbers shown are current release goals for each location. The Macaulay Salmon Hatchery and Snettisham Hatchery Annual Management Plans on the ADF&G website show actual yearly releases by species, by locations.

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

Matt Doumit
11814 96th Ave. SW
Lakewood, WA 98498

Alaska Board of Fisheries
1255 W. 8th 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.

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

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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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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.

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.

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.

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.

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

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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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.

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.

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.

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



Submitted by: Brian Gierard

Community of Residence: Ketchikan

171 opposition

172opposition

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.

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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,

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.

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

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.

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,

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

PC191

Submitted by: Carrie Grove

Community of Residence: Palmer

No trawling within 3 miles of Alaska shoreline.

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.

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

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.

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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,
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.

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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,
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

